

FOOD SAFETY INSIGHT



Everybody eats... Everybody cares about food safety!



A Publication of Perry Johnson Registrars Food Safety, Inc.



FSMA: What is it and How does it Affect Your Organization?

The Food Safety Modernization Act (FSMA) was created in response to several high profile incidents of contamination of imported foods and domestic food products. The FSMA was signed into law by President Obama on January 4, 2011, and includes sweeping reforms of US food safety laws amending the archaic Food, Drug and Cosmetic Act (FD&CA) of 1938.

The FSMA is divided into four titles: prevention of food safety hazards, detection of and response to food safety problems, improving the safety of imported foods, and miscellaneous provisions.

The key provisions are:

1. There is a requirement for food facilities to register with FDA every two years. Food products from an unregistered facility will not be allowed to be imported into the United States or introduced into interstate or intrastate commerce.
2. Registered food facilities must conduct hazard analyses and to develop and implement written preventive controls plans.
3. Registered food facilities must maintain additional records, including copies of their hazard analyses and preventive controls plans, related records, and additional records to assist FDA in tracking and tracing high-risk foods.
4. Food importers are required to implement foreign supplier verification programs and to take steps to verify that the food they import is safe.



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BRC for Food Packaging and Packaging Materials: Issue 5 Changes

The newest issue of the British Retail Consortium, or the BRC, was released in July 2015. The changes it presents will go into effect on January 1st, 2016. That means the auditing process will change, and organizations need to prepare.

In Issue 5, the “low-hygiene risk” category is now known as the “basic hygiene” category. Additionally, two sections in the Senior management commitment and continuous improvement chapter have been merged and some requirements have been reorganized to create a more streamlined, logical flow.

Risk of migration is now included as a potential hazard in the manufacture and storage of packaging materials, as well as the potential for malicious intervention. Management of incidents, recalls, and withdraws are fully readdressed. There will also be more requirements on pest control.

Two new clauses have been added on graphic design and artwork control, as

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What is Halal Certification?

In Arabic 'Halal' means lawful or permitted. Halal is a part of Sharia law that guides the actions and behavior of Muslims similar to Kosher that contains the guiding principles of Jews. In the context of food, Halal is the dietary standard prescribed by Koran and practiced by Muslims all over the world. It is the religious duty of every Muslims to ensure that all foods, as well as non-food items like cosmetics and pharmaceuticals, are halal. Frequently, these products contain animal by-products or other ingredients that are not permissible for Muslims to eat or use on their bodies.

The market size of Halal industry is about US\$1.2 trillion (Global Halal Congress, 2010). Halal certification is not mandatory, but companies certified to Halal standard have a competitive advantage, particularly when the population of Muslims is on the rise globally (1.6 globally). Halal certification imposes stringent sanitation requirements complimentary to the HACCP program.

In general:

- Halal foods do not contain components that are not permitted by Sharia law.
- Produced using equipment or machinery that have been cleaned according to Islamic law.

All foods are considered Halal except the following:

- Alcoholic drinks and intoxicants
- Enzymes (microbial enzymes are permissible)
- Gelatin from non-Halal source (fish gelatin is Halal)
- Lard and tallow
- Non-Halal animal shortening
- Pork products
- Carnivorous animals, birds of prey and certain other animals
- Non-Halal animal fat



Halal certification is a process by which a recognized organization certifies products and or services offered by a company meet the specified halal standard. In the case of halal food certification, it follows the "farm to table" approach. This provides consumer confidence and prevents any confusion about the halal status of a product. Halal certificates are given to companies that meet the defined criteria.

Halal product certification system also involves testing and inspection activities. It is important to ensure the body offering the service (certification, testing, and consultancy) is competent and complies with stipulated requirements.

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Client Spotlight: Hoekstra Potato Farms

PJRFSI is proud to present Hoekstra Potato Farms as this editions' client spotlight.

Hoekstra Potato Farms began in 1967 with William Hoekstra and his two sons, Bob and Jerry. Today the company is run by Bob and his two sons, Tom and Steve.

Located in Saint Anne, IL, Hoekstra Potato farms provide companies with their potatoes to be turned into chips. Their focus is to grow the highest quality potatoes and to deliver them in an environmentally responsible manner. They even cook potato chip samples in their lab to ensure their potatoes are of the best quality.

Since most of their customers are requiring a GFSI approved certification, becoming GLOBALG.A.P. certified will bring more awareness to their standard operating procedures. Their certification is anticipated to be in place by the end of October 2015. By being certified they anticipate serving new customers in addition to pleasing their current customers.

PJRFSI wishes Hoekstra Potato Farm success on their path to certification! ◆



What is HARPC?

Hazard Analysis and Risk-Based Prevention Controls, or HARPC is a set of requirements similar to the Hazard Analysis and Critical Control Point, or HACCP. HACCP requirements apply to low-acid canned food, seafood, and juice processors. In comparison, HARPC applies to nearly all food facilities.

Under the Food Safety Modernization Act (FSMA), the FDA requires the food industry to implement comprehensive, preventative controls across the food supply chain. Thus, all food facilities that fall under the FSMA Act must conduct HARPC, and establish science-based preventative controls to reduce the risk of contamination. This means the food industry must understand how the risk-based rules of HARPC compare to the rules of HACCP. They must also have a process in place to achieve and maintain compliance with the FSMA law for preventing risk of contamination.



HARPC enforces preventative controls to find potential risks or threats to the food supply chain. It also requires suppliers to have a corrective actions plan in place proactively to prevent contamination.

Any facility that manufactures, processes, packs, distributes, receives, holds, or imports food can benefit from HARPC. For more information on HARPC compliance or to receive a free quote, contact us at: 1-877-663-1160 for a Project Manager in your area! ◆

GLOBALG.A.P. CoC Version 5

Version 5 of the GLOBALG.A.P. CoC was published in December 2014, and enforced in June 2015. The new version aims to ensure that GLOBALG.A.P. certified products are not mixed with non-certified products, and to verify that certified products are, indeed, certified. The CoC covers traceability and mass balance points, rather than food safety, which is audited under a separate BRC audit.



There are three basic CoC requirements organizations must follow:

1. The CoC certified company checks GLOBALG.A.P. status on all incoming products.
2. The company must uphold segregation, traceability, and mass balance of products.
3. Products must be labeled with the CoC Number of the company, and certified products must be identified on the transaction documents.

This new version broadens the scope and applicability. It covers all crops, livestock, and aquaculture for producers, packers, wholesalers, distributors, processors (livestock and agriculture only), brokers, and retail distribution centers.

The new update will result in two separate certificates; a BRC auditor will audit the GLOBALG.A.P. CoC as an add on to the BRC Food audit.

For more information about GLOBALG.A.P., please contact PJRFSI by calling us at 1-877-663-1160. ♦

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5. Food facilities and food importers are subject to new fees, including a fee to be paid by each domestic food facility or importer that undergoes a re-inspection because of a material non-compliance identified during an initial inspection;
6. Laboratory tests to be used for regulatory purposes must be performed by either a Federal laboratory or an accredited non-Federal laboratory, and lab test results must be sent directly to FDA;
7. Food facilities will be inspected with greater frequency and not less often than once every 5 years.

It is important for the food industry to understand the meaning and significance of “preventive control”. The term “preventive control” means “those risk-based reasonably appropriate procedures, practices, and processes that a person knowledgeable about the safe manufacturing, processing, packing, or holding of food would employ to significantly minimize or prevent the hazards identified under the hazard analysis... and that are consistent with the current scientific understanding of safe food manufacturing, processing, packing, or holding at the time of the analysis.”

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PJRFSI Advantages

Perry Johnson Registrars Food Safety, Inc. is proud to support and promote their clients on social media and through quarterly newsletters. Does your organization do something unique? Do you have best practices you would like to share with the food safety community? PJRFSI will provide the platform for you to promote your company! Contact Amanda Wilczak if your organization wishes to be featured or find out more about our Client Spotlight program! Amanda can be reached at **1-800-800-7910** ext. 4735 or via email at awilczak@pjr.com.

GLOBALG.A.P. Version 5

GLOBALG.A.P. is the world's leading farm assurance program, with over 100 countries following the requirements of Good Agriculture Practices (G.A.P.). It focuses on globally accepted criteria for food safety, sustainable production methods, worker and animal welfare, and the responsible use of resources.



The GLOBALG.A.P. board has just announced an update to its Integrated Farm Assurance (IFA) standard. IFA is the full GLOBALG.A.P. certification program. It covers agriculture, aquaculture, livestock, and horticulture production. It also examines other aspects of food production and the supply chain, such as chain of custody and compound feed manufacturing. IFA is revised every four years. This new update will be the fifth version of the standard, and will directly effect all 150,000 GLOBAL G.A.P. certified producers around the world.

Version 5 is the biggest revision in the history of GLOBALG.A.P., and incorporates the latest research and government requirements. This includes compliance with FDA's proposed rules, and European Safety Law, and recognition of microbial risks. Over 2,000 comments from all over the world were taken into account when assembling this new version. This decision emphasizes the fact that GLOBALG.A.P. strives to incorporate public and governmental guidelines, despite the fact that it is a private standard, to keep up with new trends and threats in the industry.

To learn more about Version 5, and how it may effect your business, please contact PJRFSI at www.pjrfsi.com, or **1-877-663-1160**. We are fully prepared to guide you through this transition process efficiently. ◆

(HALAL CONT. FROM PG 2)

Perry Johnson Registrar Food safety Inc., offers three types of Halal certifications:

- Products certification: Individual products can be certified; this includes the production process and ingredients used in the manufacturing of that particular product.
- Facility certification: Facilities producing products according to the Halal certification standards can also be certified.
- Retail premises such as restaurants can also be certified to assure food prepared and sold from the retail business is halal.

Halal certification by PJRFSI is recognized and approved by the International Halal Integrity Alliance (IHI Alliance), a global organization widely respected for its strict adherence to Sharia law and principles.



The International Halal Integrity Alliance is an international non-profit organization (located in Malaysia) created to uphold the integrity of the halal market concept in global trade through recognition, collaboration and membership. It is a non-government organization (NGO) that can also provide accreditation to certification bodies in addition to other national accreditation bodies.



Advantages of Halal Certification

1. Provides assurance that products and/or facilities comply with Halal requirements.
2. Enhanced marketability of products.
3. Guaranteed acceptance of products by the Muslim community globally. ◆

PJRFSI

Career Opportunities



Due to our enormous growth, we are seeking auditors in both The United States and Canada for the following standards that meet minimum qualification requirements.

BRC Auditors (Food) – Degree required in food science/chemistry or a similar degree, a minimum of 5 years work experience in food processing and must have completed and passed BRC 3rd party auditor course.

BRC Auditors (Packaging) – Degree required in food science including a packaging course, or a degree in packaging. Minimum of 3 years work experience and must have completed and passed BRC 3rd party auditor course.

SQF - Requires a degree in food science or similar degree, a minimum of 5 years work experience in food processing, and must have passed SQF Lead Auditor Course and be a registered SQF auditor. Seeking SQF auditors specifically in the Pacific Northwest.

GLOBALG.A.P. Inspector/Auditors (Fruit and Vegetable) – Requires degree in agriculture or a food related degree, and 4 years work experience in an agricultural field (fruit and vegetables), must have completed and passed the QMS GLOBAL G.A.P. auditor course.

Prior auditing experience desired but not mandatory. For immediate consideration submit your resume in confidence to lmaloney@pjrfsi.com. ♦

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well as incoming goods. Requirements for in-line testing were moved, and are now a part of product inspection.

Changes in protocol make up the bulk of the difference. Sites achieving five or less non-conformities will get an AA grade. There will be 8 fields of audit, as opposed to 5 in Issue 4. A Global Markets program will be in place for Packaging. Vertical audits will become a requirement. An optional unannounced audit program will be introduced in Version 5, as well as optional modules, like traded goods and environmental awareness modules.

To ensure your organization is prepared for these changes, don't hesitate to contact Ramakrishnan Narasimhan at PJRFSI at rnarasimhan@pjrfsi.com, or calling at 1-877-663-1160. ♦

Tradeshows & Events:

A trade show booth for PJRFSI. The booth features several displays: a large photo of a young child eating a slice of watermelon, a sign that says "AUDITORS WANTED" with a list of standards (BRC, SQF, FSSC, etc.), and various brochures and informational materials. The PJRFSI logo is prominently displayed on the booth's backdrop.

Come and Join Us at:
SQF 2015 International Conf.
November 3-5, 2015
JW Marriott, Indianapolis, IN

Preventive controls may include the following:

- Sanitation procedures for food contact surfaces and utensils;
- An environmental monitoring program to verify the effectiveness of pathogen controls in processes where food is exposed to a potential contaminant in the environment;
- A food allergen control program;
- Supplier verification activities related to food safety.



Another important requirement of the FSMA is the implementation of HARPC (Hazard Analysis Risk Based Preventive Control System) to proactively control food safety hazards. This is conceptually different from the conventional HACCP system.

The HARPC system consists of:

Hazard Analysis: Similar to hazard analysis of HACCP model, but it includes the identification and evaluation of known biological, chemical, physical, radiological and hazards that may be intentionally introduced for purposes of economic gain. The identified hazards must be assessed for risks and justification to be included in the preventive control program with appropriate justification.

Preventive Controls: Include three types of controls: *process control*, *environmental control* and *allergen control*. FDA believes that not all preventive controls are process controls. Supplier control by companies requires facilities to undertake either testing of suppliers' products or assessment of suppliers' Preventive Controls Programs. In the future, acceptance of suppliers' Certificate of Analysis (COA) or copies of second or third-party audit may or may not be adequate to meet the FDA requirement.

FDA now has awesome powers for inspections, both domestic and international parameters. A minimum inspection frequency of once every 5 years for domestic food facilities has been established under the FSMA, and domestic high-risk facilities will be inspected at least once during the 5-year period of the date of enactment once every 3 years thereafter. Domestic facilities that are not high-risk facilities will be inspected at least once during the 7-year period from the date of enactment, and at least once every 5 years thereafter. FDA is required to inspect at least 600 foreign facilities during the first 1-year period following the date of enactment, and to inspect at least twice the number inspected during the previous year in each of the next 5 years.

In order to control the safety of food imported into the country, the FSMA has introduced a new program called Foreign Supplier Verification Program (FSVP). FDA mandates that each importer performs foreign supplier verification activities, which may include monitoring records of shipments, lot-by-lot certification, annual on-site inspections of foreign suppliers, checking the hazard analysis and prevent controls plans of foreign suppliers, and periodic sampling and testing of shipments.



To learn more about how the FSMA can affect and benefit your business, please contact Dr. Ramakrishnan Nara, Technical Director at Perry Johnson Registrars Food Safety, Inc. at: rnarasimhan@pjrfsi.com or call us at: 1-877-663-1160. ◆

Check us out on 



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Upcoming FREE Webinars from PJRFSI

PJRFSI is hosting a series of free, educational webinars in the coming weeks and months. Check out what's coming up below! Go to our website www.pjrfsi.com now to register.

October 30th, 2015 – 11:00am-12:00 noon EDT

FSMA and Food Storage Requirements:
How is the food supply chain gearing up for the new requirements?



November 16th, 2015 – 11:00am-12:00 noon EDT
FSMA and HARPC: All you wanted to know about

December 15th, 2015 – 11:00am-12:00 noon EDT
Root Cause Analysis

In the event you cannot attend a webinar at its scheduled time, we have the recordings available to download from our website at www.pjrfsi.com/webinars/past-webinars. We currently have the following webinars available for download:

- **9/24/15** – How do we manage Corrective and Preventive Actions in the Implementation of GFSI standards?
- **7/27/15** – HACCP, VACCP and TACCP - Where is the food industry going with all these control systems