

FOOD SAFETY INSIGHT



Everybody eats... Everybody cares about food safety!



A Publication of Perry Johnson Registrars Food Safety, Inc.



GLOBALG.A.P. Updates

The interim final v6 of IFA (Integrated Farm Assurance) will be launched in April 2022 for fruits and vegetables, flowers and ornamentals, hops, and aquaculture. The IFA v6 final will be published in September 2022, and will not become obligatory until April 2023. Combinable crops, plant propagation material, tea, and livestock will be published at a later date.

As first communicated on September 24, 2021, GFSI has announced that the interpretation for unannounced inspections/audits will be changed for GFSI version 2020 Benchmarking Requirements. Under the new interpretation, which took effect October 1, 2021, unannounced inspections or audits must be fully unannounced without any prior notification to the producer or group.

GLOBALG.A.P. has issued a clarification for IFA v5.3-GFS, IFA v5.4-GFS CP FV 5.7.1, which reads "Is the source of water used for final product washing potable or declared suitable by the competent authorities?" The wording of this point led to confusion during audits, resulting in this clarification:

"Water applied directly to product during post-harvest processes shall have a water analysis at the point of application – or as near to the point of application as possible – that proves compliance with the required standard."

Likewise, IFA v5.4-GFS, CPCC FV 5.9 has also received clarification:

"The requirement to include environmental monitoring in a producer's risk assessment, where the producer determines whether to perform environmental monitoring, is applicable to the harvest and post-harvest production, including harvest activities and equipment, packing in-field, storage, and the product handling unit (PHU). Water testing, given as an example in the compliance criteria, could refer to water used at or post-harvest and is a suggestion of how to apply the criteria."

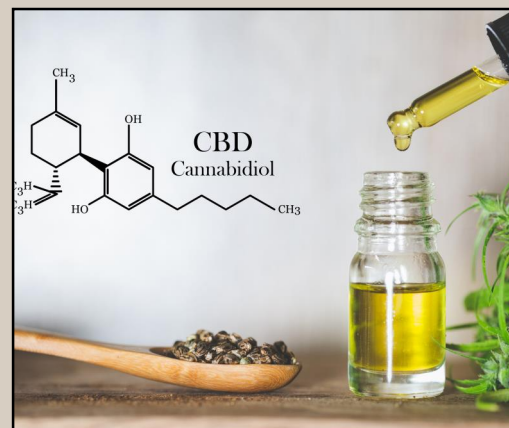
It is important to note that environmental monitoring is still not required on-farm, but all producers must address whether and how environmental monitoring fits into their food safety verification procedures.

If you have questions about these updates and clarifications, or about GLOBALG.A.P. in general, reach out to PJRFSI at pjrfsi@pjrfsi.com. ♦

CBD Looking Toward The Future

The cannabis and hemp markets are among the most quick-changing and diverse in the world today. These industries have been inhibited by regulatory restrictions for most of recent history, but as governments and municipalities have begun moving toward legalization, the markets have expanded almost explosively. But with this atmosphere of consistent change and lingering uncertainty, what does the future look like? This article takes a look at several pertinent questions regarding the CBD aspect of the cannabis and hemp industry.

Why isn't CBD treated like other botanical extracts?



From essential oils to vitamin concentrates, there are a huge number of botanical extracts and derivatives on the market. CBD, however, has long carried a shadow of wariness – almost suspicion. But why?

(CBD CONT. ON PG 2)

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Despite having an over 2,500-year history of use, cannabis carries with it a number of social stigmas in modern society that can be tied to racism in the early 1900s, when it was outlawed for the first time in California. Given further power in the later 20th century by the so-called “War on Drugs,” these stigmas have helped to perpetuate misinformation, fear, and a lack of understanding around the differences between the various types of cannabis and hemp products and their derivatives, such as THC vs. CBD.

Additional mistrust may have to do with the phytoaccumulator status of hemp and cannabis. Phytoaccumulators very readily absorb inputs from the environment, both good and bad – including contaminants, heavy metals, solvents, etc. While this capacity can be used for positive purposes such as cleaning up contaminated soil or places where there have been hazardous spills, their ready uptake of potentially harmful substances can put those consuming or using the plant at risk if the substances used in producing the plant are not carefully controlled and monitored. This is especially true in derivative substances or concentrates such as CBD products or other oils; the process of extracting and producing these usable goods can increase the level of chemicals or heavy metals to an unsafe level.

Best practices for CBD and hemp labeling?

Labeling has been a huge issue – every state has its own regulations. One of the safest options for producers is to study and closely follow the FDA guidelines for dietary supplements (for consumable products). Once the FDA-required information is clearly displayed, the requirements of each state that a producer intends to sell their products in should likewise be taken into account. Retail products – those physically placed onto a shelf for consumers to purchase – have thus far been under far greater scrutiny than those sold via e-commerce.



Medical and other benefit claims on labels are another area where producers may find themselves getting into trouble. This may also include the use of descriptors such as “health” or “wellness” on packaging – anything that might be construed as a promise or other guarantee of healing or medical benefits must be avoided.

Specific to hemp products, the clear marking of the product's <0.3% THC content (thus rendering it a hemp-derived item rather than cannabis) should be made readily apparent. However, claims of “0% THC” should be avoided – especially as testing methods change and improve, having such a claim found to be false due to a minutely detectable level of THC (even 0.01%!) could spell trouble.

How is the market emerging and where are hemp/CBD sales headed?

One of the largest drivers behind the CBD market continues to be word-of-mouth. While some companies have developed a foothold in retail settings with CBD products (such as calming gummies and other supplements or topicals), there remains a steady

Client Spotlight: Full Metal Canning

Founded in 2017 in Longmont, Colorado, Full Metal Canning has stood by its commitment to quality, execution, and service from the start. From craft sodas, premixed cocktails, CBD- and hemp-infused beverages to nitro coffees, their customized solutions for blending and packing have helped open the door to the industry for small- and medium-sized companies. Full Metal's ability to run batches as small as 100 gallons makes them a perfect option for start-up brands or local small businesses. With a goal of offering cost-effective problem solving to all clients, Full Metal Canning achieved SQF for Manufacturing certification with PJRFSI over the summer.

Given the company's focus on serving a diverse market with the highest quality and service, certification was a no-brainer. "This competitive advantage allows Full Metal Canning, though only a few years old, to satisfy [the needs of] big brand names," stated Abigail Blagburn, QA Manager. "In today's market, consumers expect food safety practices, and certification is the best way to stay accountable."

With plans in the near future of expanding their warehouse and production areas, Full Metal Canning's intentions to be able to run multiple beverages at a time to increase output meant that having a solid food safety system in place was crucial. By partnering with PJRFSI, Full Metal laid the groundwork for a successful expansion into 2022 and beyond. "Though certification feels like a big undertaking," said Blagburn, "we felt confident after speaking to a PJRFSI employee."

To learn more about Full Metal Canning and watch their upcoming projects, visit their website at FullMetalCanning.com. If your company is interested in the competitive advantages that SQF certification can offer, reach out to PJRFSI to learn more – call (248) 519-2523. ♦

FULL METAL
C A N N I N G



Join The PJRFSI Team

Food Safety Auditor

Perry Johnson Registrars Food Safety, Inc (PJRFSI) is a Global Assurance Certification Body who provides audit, training and risk management services to virtually every industry. Minimum two years/160 hours previous auditing experience required, preference given to lead auditor certification in food-related standards and/or undergraduate degree with coursework in agriculture, biology, or food science.

BRCGS Auditors

Seeking hardworking and articulate individuals for BRCGS subcontract auditing. Minimum of 5 years work experience demonstrating quality assurance and/or food safety functions with relation to food industry manufacturing, retailing, inspection, or enforcement. All candidates must possess a degree in a food or bioscience-related discipline in relation to the Food Sector Category they are qualified in. Qualified candidates must also be a BRC Certified Lead Auditor.

SQF Auditors

Seeking hard working and articulate individuals for subcontract SQF auditing. Minimum of 5 years work experience demonstrating operational experience in the food related industry, two of which must be in a technical, professional or supervisory position. All candidates must possess a university degree or higher education considered as equivalent in relation to the Food Sector Category they are qualified. Qualified candidates must also be a SQF Certified Lead Auditor as well as knowledgeable in Reliance Database.

BRCGS Packaging Auditor

Degree required in food science including a packaging course or a degree in packaging. Candidates must have a minimum of three years' work experience in the food manufacturing and/or packaging industries.

Contract Organic Inspector

PJRFSI is an International company headquartered in Troy, Michigan and provides organic certification to food manufacturers and farms throughout the United States and internationally. PJRFSI is seeking the right hardworking, articulate individual with strong interpersonal skills for a contract position in the field of organic inspection. The right candidate would perform onsite, virtual and hybrid inspections for our clients in North America. Inspection duties include recording observations, conducting interviews, reviewing records, taking samples and writing detailed reports with ample objective evidence. This is a contract position and requires travel. May work from home anywhere in the USA.

Required Skills & Qualifications:

- IOIA organic inspector training certificate for crops and/or processing
- Two years work experience in related field such as farm, food manufacture or personal care product manufacture
- Excellent communication and writing skills
- Competency in PC or Mac operating systems

Contract Agriculture Food Safety Auditor

(Most needed for the San Jose/Central Valley area of California.)

PJRFSI is an International company headquartered in Troy, Michigan and provides 3rd party certification to food manufacturers, produce packhouses, and farms throughout the United States and internationally. PJRFSI is seeking the right hardworking, articulate individual with strong interpersonal skills for a contract position in the field of agriculture food safety auditing. The right candidate would perform 3rd party audits to GFSI schemes such as GLOBALG.A.P for our clients in North America. This is a contract position and requires travel.

Call or email resume to: lmaloney@pjrfsi.com. ♦



flow of interest on a grassroots level; one person hearing about the benefits of CBD from a trusted friend and deciding to try it themselves. Continuing to harness this level of trust and familiarity with safe, effective products will continue to play a role in directing the future of the CBD market.

What are some strategies to reduce the risk of regulatory actions against CBD producers?

Stay away from medical claims, not only on labels but ANYTHING associated with the company – website, social media, reviews, blogs, etc. Even if customers are making statements in reviews, if you publish them then they are viewed as your own claims. Medical claims are the number one cause of the FDA and state regulators going after producers.

In the absence of federal regulations, do not assume it's a free-for-all – follow GMPs. Regardless of state regulations or other municipal requirements, seeking certification in the GMP areas best suited for your type of product may help insulate you from scrutiny.

What challenges are CBD products facing in retail settings?

Big retailers and familiar chains have, historically, avoided adding CBD products to their shelves due to the often-tedious differences in regulations and requirements from state to state. However, some chains such as The Vitamin Shop and Walgreens have begun to sell CBD products in select states, with great care taken with regards to specific regulations. The strategies of these chains are likely to remain selective – particularly leaning toward trusted CBD brands – and may seek out those producers who have gone above and beyond the bare minimum to prove their trustworthiness and quality through certification.

As more unified policies are introduced and pass on a national level, the presence of CBD products on store shelves should, in theory, become more and more commonplace.



In conclusion

It goes without saying that the hemp and cannabis industries – as well as their derivatives – will remain some of the most dynamic markets in the national retail and manufacturing scene for some time. As states continue to determine the legality of these substances and under what regulations they will be made available, PJRFSI is here to help you each step of the way. Whether through GMP or GAP certification, supplier audits, or other certification services, let us put our experienced team of auditors to work for you. Call (248) 519-2523 to learn about what options are available, or visit our website at www.pjrfsi.com. ♦

A banner for PJRFSI Podcasts. It features a woman in a yellow cap and headset smiling, with a blurred background of a retail or manufacturing setting. The PJRFSI logo is on the left, and the text 'The Perry Johnson Registrars Food Safety, Inc. Podcast' is on the right.

PJRFSI Podcasts

The Perry Johnson Registrars Food Safety, Inc. Podcast

Have you caught up with the latest PJRFSI Podcast episodes? With segments on topics from Enterprise Risk Management and SQFI to Environmental Monitoring Programs and Supplier Quality, there's sure

to be an episode to interest everyone! Best of all, each episode of the podcast is free to listen to through PodBean! Click the link to see the full list of episodes and start listening today! <https://www.pjrfsi.com/podcast> ♦

PJRFSI Back At Tradeshows

The entire team at PJRFSI is excited to be back to attending a select number of tradeshows in-person! We attended NASCES and NAFS 21 in Chicago as well as MJBizCon in Las Vegas recently – a huge thank-you to those responsible for putting on these events as they were well-run and enjoyable! ♦



Perry Johnson Registrars Food Safety, Inc.

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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.

In the event you cannot attend a webinar at its scheduled time, we have the recordings available to view and/or download from our website at

www.pjrfsi.com/webinars/past-webinars. We currently have the following webinars available for download:

- 12/9/2021
Brand Protection, Going Beyond Food Safety in 2022

Keep checking back to our website for newly added webinar dates. ♦