

# FOOD SAFETY INSIGHT



Everybody eats... Everybody cares about food safety!



A Publication of Perry Johnson Registrars Food Safety, Inc.



## Unannounced SQF Audits (Nothing to be afraid of!)

The growing concern for food safety and quality is bringing big changes to the world of food production. Now more than ever, consumers are aware of the threat of recalls and the dangers they pose. Certifications, like Safe Quality Food (SQF), ensure that products have been produced, processed, and handled to the highest possible quality standards, domestically and internationally.



This year, SQF added mandatory unannounced audits to their certification process. An unannounced audit seems intimidating, as organizations generally have time to prepare. Organizations will undergo an unscheduled audit every three certification cycles, so there could be four or five years in between each audit. This gives organizations more time to prepare. Organizations will also have a 60 day window of when this audit will occur, meaning that there is some idea of when the audit will occur. The company can also submit blackout dates, to ensure production is running when the unannounced audit occurs.

Unannounced audits have their benefits. If the audit was unannounced, it will be stated on the certificate, showing clients that the products your organization produces are audit ready at all times. So far, almost 100 unannounced SQF audits have taken place, and SQF hasn't found a substantial difference in audit scores and nonconformities between unannounced and regularly scheduled audits.

For any additional questions about unannounced audits, please contact Lauren Maloney, our PJRFSI Food Safety Administrative Manager, at [lmaloney@pjrfsi.com](mailto:lmaloney@pjrfsi.com) or 1-877-663-1160. ♦

## Halal Certification

With all the diet restrictions out there, the supermarket can be a scary place for some consumers. People with conditions that prevent them from eating certain ingredients understand what it's like to have to avoid more than half of the items in the store. Their lives are simplified, however, by certifications. A gluten free certification, for example, allows food manufacturers to put a 'gluten free' stamp right on the front of their products. This makes it simple for consumers to identify safe foods.

In addition to medical conditions, religious beliefs also play a role in food selection. Kosher is a very common religious dietary regulation that conforms to Jewish dietary laws. Another one that is becoming increasingly common is Halal, which relates to food products that conform to Islamic Shari'ah, or Islamic law.

Halal has some strict requirements, and it is very important to Muslim consumers that these requirements are met to ensure that they are abiding to their beliefs. In other words, Halal products cannot contain anything that is "Haram" – which is one of the five Islamic commandments that outlines acts or things forbidden by the Allah.

Beyond simply avoiding Haram ingredients, Halal also has a few other general requirements:

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# Comparing HACCP and HARPC

## What is the difference between the HACCP and HARPC?

The United States Congress signed the Food Safety Modernization Act (FSMA) in 2011 and the Food and Drug Administration (FDA) is mandated to implement the FSMA's new food safety regulations.

FSMA's proposed rules are preventative. With the globalization of the food supply chain and constantly emerging new food safety risks, the food industry is forced to take proactive steps to minimize and/or prevent potential for contamination of food and thus reduce food recalls across the food supply chain.

Under the FSMA Act, the FDA requires the food industry to implement comprehensive, science-based preventive controls across the food supply chain. This means that all food facilities that fall under the FSMA Act must conduct **Hazard Analysis and Risk-Based Preventive Controls (HARPC)** and establish science-based preventive control measures to reduce the risk of food contamination.

Therefore, the food industry should:

- Understand how the risk-based preventive control rules compare to HACCP principles, and,
- Establish process controls in order to achieve and maintain compliance with the new FSMA law for preventing risk of food contamination.



The Hazard Analysis and Critical Control Point (HACCP) system and the current Good Manufacturing Practices (cGMP) are primarily designed to ensure that food is manufactured, processed, packaged and stored in sanitary conditions to prevent post-process contamination in order to ensure that the food is safe, wholesome, and without visible quality deterioration.

The HARPC plan under FSMA has a similar concept, but the approach is somewhat different from cGMP and HACCP, as HARPC will enforce preventive controls to identify potential risks or threats to the food supply and to implement appropriate corrective actions proactively to prevent contamination. The FDA prescribes science-based standards for conducting hazard analyses, and implementing and documenting preventive controls.

FSMA proposes a “qualified individual” or a “team of qualified individuals” from a facility to understand the significant food safety hazards and put in place preventive controls to minimize the risk of hazards. The HARPC system requires food manufacturing facilities to identify and implement science or risk-based

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## Client Spotlight: Better Made Snack Foods

**B**etter Made has been producing high quality food products since 1930. Made in Detroit for over 80 years, Better Made utilizes the Safe Quality Food (SQF) certification in their business to ensure that what they produce is not only great quality, but completely safe as well. We had the pleasure of speaking with Matt Ciechanowski, the SQF Practitioner at Better Made, to learn more about how the certification has helped to improve their business.

**PJRFSI:** What do you think sets Better Made apart from the competition?

**Matt:** We're a family owned business celebrating our 85<sup>th</sup> anniversary in Detroit. We consider our products to be a household staple, and use only the best quality ingredients for our customers.

**PJRFSI:** Do you have any tips or advice for people embarking on the journey to obtain a SQF Certification?

**Matt:** You need support from the all levels of the company. Everyone should be involved, you need all hands on deck. It's a lot of hard work, but it's improved our documentation and the overall safety & quality of our products.

**PJRFSI:** What are the benefits to SQF certification that Better Made has experienced firsthand?

**Matt:** A big one is that it has given our customers and business partners an assurance that the products we produce for them are high quality, and they don't have to worry about them harming anyone. It has also allowed us to grow, and given us more business opportunities.

**PJRFSI:** What are Better Made's plans for the future?

**Matt:** We hope to continue investing in personnel & equipment to expand our brand locally and nationally.

**PJRFSI:** What is the company philosophy at Better Made?

**Matt:** We promise to make good, high quality products that keep people coming back for more.

With a commitment to quality and safety, Better Made is truly a staple in the food industry. To find out more about Better Made, visit their website at [www.bettermadesnackfoods.com](http://www.bettermadesnackfoods.com), and to learn more about SQF certification, visit [www.pjrfsi.com/standards/sqf](http://www.pjrfsi.com/standards/sqf). ♦



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preventive controls, rather than critical control points (CCPs) as required by the conventional HACCP system. Therefore, the establishment of critical limits may not be required under the HARPC. The validity of preventive controls for minimizing the significant food risks should be backed up by scientific data or authentic scientific literature. A HACCP plan is not mandatory but the FSMA HARPC is mandated by law under the FSMA Act.

#### What hazards should be identified for HARPC?

- Biological, chemical, physical and radiological hazards.
- Natural toxins, pesticides, drug residues, decomposition, parasites, allergens, and unapproved food and color additives.
- Naturally occurring hazards or unintentionally introduced hazards.
- Intentionally introduced hazards (including acts of terrorism).

#### What examples of types of preventive Controls are listed in FSMA for the HARPC provision?

- Sanitation procedures at food surface contact points.
- Sanitation of utensils and equipment.
- Environmental monitoring program (for pathogen controls).
- Staff hygiene training.
- Food allergen control program.
- Recall plan.
- Current Good Manufacturing Practices (cGMPs).
- Supplier verification activities.



#### Who is exempt from HARPC?

The following categories are exempted from the HARPC plan requirement:

- Facilities under USDA jurisdiction handling, processing, and shipping meat, poultry, eggs, etc.

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## **PJRFSI** **Advantages**

Perry Johnson Registrars Food Safety, Inc. is dedicated to quality certifications and excellent customer service. We operate with your best interest in mind. Choosing PJRFSI as your accreditation body will set you apart from the competition. Here are just a few of the advantages of working with PJRFSI:

- We hold accreditations with ANSI and UKAS.
- We offer client-based free webinars, informational newsletters, seminars, and in-person training to ensure your success.
- Communication is made simple with a dedicated single point of contact for scheduling and customer service concerns throughout the certification process.
- FREE customized certification service plan and pricing.
- Highly qualified and trained staff with a loyalty and passion for the industry and helping you succeed.

Please give us a call at **1-877-663-1160** if you have any questions or concerns, we look forward to working with you.

**Visit our Website:**

**WWW.PJRFSI.COM**

(COMPARING CONT. FROM PG 4)

- Operations under the FDA's Seafood and Juice HACCP regulations.
- Facilities subject to the FDA's new standards for Produce Safety Authorities. This exemption applies to farms, cooperatives, growers, harvesters and other companies handling raw fresh fruits and vegetables.
- Low acid and acidified canned food processors.
- Facilities defined as “small” or “very small” businesses.
- Facilities with a previous 3-year average product value or revenue of less than \$500,000.
- Facilities that mainly produce food for animals, store raw agricultural commodities other than fruits and vegetables intended for further processing, or facilities that store packaged food not exposed to the environment for potential cross-contamination.
- Facilities that are mainly engaged in manufacturing, processing, packing or holding that are considered to be low risk operations, such as shelling and hulling of almonds.
- Retail food establishments, restaurants, and farms.



### Who needs HARPC plan?

Any facility that manufactures, processes, packs, distributes, receives, holds or imports food must develop a HARPC plan for compliance with the FSMA HARPC compliance.

Except as exempted above, all facilities subjected to the FDA's Bioterrorism Facility Establishment registration, both in the United States and abroad, that are producing food products for distribution in the United States must develop and implement a HARPC plan that identifies risks “known or reasonably foreseeable” for each type of food subject to the regulation. The preventive controls should be adequate to “significantly minimize or prevent” identified hazards so that the food is safe. The facility must provide a HARPC plan to the FDA upon receiving an oral or written request.

### When was the HARPC plan implemented?

FSMA HARPC was made into law on July 4, 2012. However, the FDA issued a proposed rule implementing the hazard analysis and risk-based preventive control provisions of the FSMA act on January 2013.

### How frequently does the HARPC need to be updated and submitted to the FDA?

The FDA requires that a facility updates its HARPC plan every 3 years or whenever there is a significant change in the processing facility that may increase a potential hazard or introduce a new hazard. Additionally, the FDA under the FSMA statute may require an updated plan based on unintentional or new hazards associated with biological, chemical, radiological or terrorist threats that may occur at a food facility that manufactures, processes, packs or holds food intended for human consumption.

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# 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 3<sup>rd</sup> 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 3<sup>rd</sup> 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.



## Tradeshows & Events:

A collage of images related to food safety. It includes a child eating watermelon, a truck, a sign for auditors wanted, and various food safety logos and text. The collage is part of a trade show booth display.

### Come and Join Us at:

**Pack Expo** September 28-30, 2015  
Las Vegas Convention Center  
Visit us at Booth # 8209

**SQF 2015 International Conf.**  
November 3-5, 2015  
JW Marriott, Indianapolis, IN

**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](mailto:lmaloney@pjrfsi.com). ♦

## Industry Update!

**GLOBALG.A.P.** – Version 5 has now been released and we can certify clients to this updated version. From now until July 2016 this version of the standard is optional but after July 2016 it becomes mandatory.

[http://www.globalgap.org/uk\\_en/what-we-do/globalg.a.p.-certification/ifa-revision-process-for-version-5-00001/](http://www.globalgap.org/uk_en/what-we-do/globalg.a.p.-certification/ifa-revision-process-for-version-5-00001/)

(HALAL CONT. FROM PG 1)

- A halal product cannot be prepared, processed, stored or transported using facilities, equipment, utensils or processes considered as Haram.
- A halal product cannot come into direct contact or contamination with any item considered as Haram during the course of preparation, processing, transportation, or storage.

Like many other quality management systems, a Halal certification requires support and commitment from top management. Management must ensure that employees of all levels understand the importance of meeting Halal integrity, product safety, quality, social and environmental responsibility, and customer requirements.

A Halal certification ensures your clients and customers that you care about the strict requirements of the standard. They can be assured that their religious beliefs will not be at risk, because all possible steps to safety and quality have been met. To learn more about Halal certification, or for more information on our Food Safety programs contact us at [1-877-663-1160](tel:1-877-663-1160) for a Project Manager in your area or email us at [pjrfsi@pjrfsi.com](mailto:pjrfsi@pjrfsi.com). ♦

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### **What consequences can the FDA impose if no HARPC plan is in place or the plan is inadequate?**

If a facility mandated to develop a HARPC plan does not create a plan or if the FDA inspector determines that a HARPC plan is inadequate to address threats, the FDA can:

- Issue a public warning letter and/or an import alert for a foreign supplier, effectively banning imports from such a foreign supplier. Food products from a foreign facility or supplier that is placed on the import alert would be detained at US ports on arrival, thereby effectively barring it from entering into US commerce until the FDA reviews and approves an updated HARPC plan.
- Criminally charge a corporation or the person in charge of a facility for failing to meet HARPC compliance.
- Suspend the facility's food facility registration, thus preventing the facility from distributing food in the US until the FDA approves the updated plan and corrective actions. This would take place if food from a non-compliant facility is found to pose a significant food safety risk.

### **What type of scientific evidence is required under FSMA to validate process control?**

The FDA may accept established and proven process controls such as a pH level of less than 4.6 or a water activity of less than 0.85 or a cooking temperature of 165 deg. to validate the elimination of certain pathogens.

New studies would be required for new or novel processes and there is no scientific data or literature available to validate the effectiveness of process controls at mitigating hazards.



For more information on HARPC and HACCP contact us at [1-877-663-1160](tel:1-877-663-1160) for a project manager in your area or send a request for additional information at [www.pjrfsi.com](http://www.pjrfsi.com). ♦



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## *Upcoming FREE Webinars From PJRFSI*

**P**JRFSI 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](http://www.pjrfsi.com) now to register.

### **August 21, 2015 – 11:00am-12:00 noon EDT**

How do we manage Corrective and Preventive Actions in the Implementation of GFSI standards?



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

- **7/27/15** – HACCP, VACCP and TACCP - Where is the food industry going with all these control systems
- **6/19/15** – Chemical Contaminants in Food - Does the Food Industry Pay Adequate Attention
- **3/25/15** – A Comparison of GFSI Standards
- **2/25/15** – BRC Global Standard for Food Safety Issue 7

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