

FOOD SAFETY INSIGHT



Everybody eats... Everybody cares about food safety!



A Publication of Perry Johnson Registrars Food Safety, Inc.



Foreign Supplier Verification Program

The newest Food Safety Standard released by the FDA is the Foreign Supplier Verification Program (FSVP). The FSVP rule requires importers to conduct a range of activities to ensure that food from foreign suppliers are produced in compliance with applicable food safety provisions. The final rule became effective January 26, 2016, but companies have until May of 2017 to become compliant.

This final rule reflects the statutory requirements set forth in the Food Safety Modernization Act (FSMA) and is intended to provide a flexible, risk-based approach to foreign supplier verification. The requirements aligns with the hazard analysis and risk-based



preventive controls requirements for USA food facilities that were established in FDA's preventive control final rules for human food and animal food released earlier this year. The FDA also clarified that it will not be necessary for an importer that is also a registered food facility and is controlling hazards under the preventive controls regulations to

comply with the majority of the provisions of this rule. These include Juice, Seafood, Research use only, Personal Consumption, Alcoholic Beverages, Low Acid Canned Foods, Dietary Supplements, FDA approved countries and Small Supplier/Importers (less than \$500K in food sales).

When looking at the FSMA framework for any rule, it basically has a two-tiered system. What FSMA is essentially doing with each of these rules is setting new safety standards (in two categories: produce safety and hazard analysis/preventive controls), and relying on industry verification of compliance. Manufacturers will not be relying on the FDA to be the primary body to enforce these new standards. For FSVP specifically, the FDA is saying that **the importer** (or party within the supply chain) has to verify that either up or downstream suppliers are meeting the new safety standards.

(VERIFICATION CONT. ON PG 7)

FSMA & GFSI Breakdown

In early September of this year, the Food Safety Modernization Act (FSMA) will go into effect and will likely impact food safety programs for the next few years. There are several ways that the BRC and SQF schemes compare to the 7 Rules which are most relevant to the food manufacturing industry. Below is a brief breakdown of these Rules under FSMA:

1. 3rd Party Accreditation/Certification
 - a. Foreign Supplier Verification Programs will likely use many of the accreditation bodies to assist in the enforcement of this Rule.
2. Preventive Controls for Human Food
 - a. Focuses on risk-based assessment and preventive controls- very similar to the HACCP program.

(BREAKDOWN CONT. ON PG 5)



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Perry Johnson Registrars Food Safety, Inc.

Headquarters

755 W. Big Beaver, Suite 1390
Troy, Michigan 48084

Phone:

1-877-663-1160

Email:

pjrfsi@pjrfsi.com

Website:

www.pjrfsi.com

Publisher:

Terry Boboige

Editor:

Tami Carr • Pam Linick
Lauren Maloney

Writers:

Tami Carr • Natalie Cloutier
Heather Sigler

Layout & Design:

Jason Millbrand

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FSPCA Training/Preventive Controls Qualified Individuals (PCQI)

Foodborne diseases present a sizeable burden on public health, which in turn contributes greatly to the overall cost of health care. Each year millions of people become sick – approximately 48 million in the United States alone. There are many ways that foodborne diseases can be contracted in the farm to table process, which is why the FDA is taking further action to prevent food contamination.

The Preventive Controls for Human Food regulation was published on September 17, 2015. The Food Safety Preventive Controls Alliance (FSPCA) developed a training course designed to train people as Preventive Controls Qualified Individuals (PCQI) which is a requirement of the regulation. The course is recognized by the FDA and is intended to ensure safe manufacturing, processing, packing and holding of food products for human consumption in the United States.



When considering the impact this regulation can have on the prevention of foodborne diseases, through the development of food safety plans that assess food safety hazards and identify the preventive measures to protect against those hazards, proper training is key.

Who should take the course?

- Potential Preventive Control “Qualified Individual”
- Facilities that manufacture, process, pack or hold human food (21 CFR Part 117)
- Facilities required to register with FDA under sec. 415 of the Food Drug and Cosmetics Act
- Personnel responsible for the implementation of FSMA/ HARPC
- Consultants
- Third party auditors

Course Contents:

Day 1

- Introduction to course and Preventive Controls
- Food Safety Plan Overview
- Good Manufacturing Practices and Other Pre-requisite Programs
- Biological Food Safety Hazards
- Chemical, Physical and Economically Motivated Food Safety Hazards
- Preliminary Steps in Developing a Food Safety Plan
- Resources for Food Safety Plans

Day 2

- Hazard Analysis and Preventive Controls Determination
- Process Preventive Controls
- Food Allergen Preventive Controls
- Sanitation Preventive Controls
- Supply Chain Preventive Controls



Day 3

- Verification and Validation Procedures
- Record Keeping Procedures
- Recall Plan
- Regulation overview GMP and HARPC



Registration:

October 10-12, 2016, Troy, MI

- Single Registration Rate: \$795
- Multiple Registration Rate: \$725 (3 or more per organization)
Call us at 1-877-663-1160 to receive a Discount Code to Apply during checkout.
- *Course rate includes: \$50 test and certification fee and cost of materials
- *Complimentary continental breakfast, lunch and drinks provided

Training Deliverables:

- A certificate of completion issued by the International Food Protection Training Institute (IFPTI) of FSPCA
- A written test will be administered at the end of the training

About the Instructor:



Dr. Ramakrishnan Narasimhan
V.P. Product Safety & Research

Dr. Ramakrishnan Narasimhan, V.P. Product Safety & Research

A versatile food safety professional with in-depth technical knowledge and senior management experience in the manufacturing and regulatory areas of food, drug, natural and other consumer product sectors as well as 25 years of international food industry experience, including blue chip companies such as Nestle and Dannon. Certified to perform SQF Code, FSSC 22000, BRC Food Safety, BRC Packaging, and BRC Storage and Distribution, IFS Food and Logistics, Gluten Free certification audits, Dr. Narasimhan, is also an approved trainer for BRC Food Safety, BRC Storage and Distribution, BRC Packaging, IFS Food and Logistics and SQF Code implementation courses.

If you are interested in registering to attend or wish to receive more information on these classes please contact us at pjrfsi@pjrfsi.com or call 1-877-663-1160 for a project manager in your area. ◆

FDA Releases Updated Nutrition Labeling Regulations

After years of debate, the FDA has finally issued new regulations regarding the nutrition facts labels on packaged foods, as well as updating the serving size requirements. The new regulations were issued on May 20, 2016, and companies with annual sales of less than \$10 million will have until July 29, 2019 to comply. The key changes include an increased type size for the “Calories,” “Servings per Container,” and the “Serving size.” The calories and serving size numbers must now be **bold**, and manufacturers must declare the actual amount. A breakdown of the changes to the nutrition label includes:

- Listing the % Daily Value of Vitamin D, iron, calcium and potassium is required.
- Added sugars are required to be listed. These include any sugars added during the processing from sources like cane and beet sugar, syrups, fruit juice concentrates, honey and maple syrup.
- “Calories from Fat” is to be removed.
- Serving Sizes adjusted -
 - Ice cream = 2/3 cup instead of ½ cup
 - Soda = 12oz instead of 8oz
- Dual column labels will list nutritional information for “per serving” as well as “per package/unit” on products that are larger than 1 serving.

Please visit www.usfoodimports.com for more detailed information. ◆



PACK EXPO
November 6-9, 2016
Chicago, IL

*PJRFSI would like to welcome you to join us
at the PACK EXPO 2016 for free!*

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www.packexpointernational.com

WWW.PJRFSI.COM

- i. All risk based CCP's (Critical Control Points) are monitored, verified and validated.



3. Foreign Supplier Verification Programs

- a. Focuses on ensuring the safety of food originating outside the U.S.
 - i. Under these new guidelines, U.S. based companies that import foreign foods, ingredients, and raw materials are now required to have procedures in place to guarantee that all imported goods are safe and free from adulteration.

4. Mitigation Strategies to protect food against Adulteration

- a. In addition to focusing on the safety of imported foods, this rule places the responsibility on U.S. Importers to assess any food safety risks and to ensure that their suppliers or processors have implemented the appropriate preventive controls for the safety of food and to conduct periodic testing to establish the standard of identity.

5. Sanitary Transport

- a. Focuses on diminishing the risk of contamination to imported goods during transportation.
 - i. Transport vehicles are required to not only be temperature controlled, but to be maintained and monitored throughout the transportation process.
 - ii. Vehicle maintenance must be done regularly to prevent contamination and all carrier personnel must be trained in sanitary transport practices.

This last requirement is probably the biggest difference in comparison between FSMA and GFSI. While both the BRC and SQF schemes require verification that that all imported inbound ingredients, raw materials, food and packaging materials are inspected, GFSI does not require the third party carrier personnel to be trained in sanitary transport.

For more information on FSMA or GFSI please contact us by email at customerservice@pjrfsi.com or by calling us at 1-877-663-1160. ◆

China Food Safety Initiative (CFSI) Enjoys Record Public and Private Support

BEIJING, 12 JULY 2016 – Never before has the annual GFSI China Focus Day, now in its fifth edition, enjoyed such extensive support from national government in addition to the broad engagement from the private sector. This year marks the first-ever joint event with the newly-established China Food Safety Initiative (CFSI), which has benefited from the engagement of top local and global brands, as well as China national agencies including the China Food and Drug Administration (CFDA), the Certification and Accreditation Administration of China (CNCA) and the China Nutrition and Health Food Association (CNHFA) - onboard with CFSI to drive food safety forward collaboratively.

Significant breakthroughs, notably thanks to recent partnerships launched with the CNCA, CNHFA and UNIDO in China have set the stage for GFSI to accelerate growth via its CFSI branch, making it the place to address food safety challenges on the ground in the China context. This one and a half day event, gathering 390 top food safety executives from China and the rest of the world, has mirrored the dynamism and priorities of GFSI for this key region. ◆



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 for Packaging – Degree required in food science including a packaging course, or a degree in packaging. Candidates must have a minimum of three years work experience and have completed and passed the BRC 3rd party auditor course.

FSSC 22000 Auditors – Degree required in in food science including microbiology and general chemistry. Candidates must have a minimum of five years full time work experience in a food chain related industry, including at least two years of work in quality assurance or food safety within food production, manufacturing, retailing, inspection or enforcement and have HACCP training.

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



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 Natalie Cloutier if your organization wishes to be featured or find out more about our Client Spotlight program! Natalie can be reached at 1-800-800-7910 ext. 4761 or via email at ncloutier@pjr.com.

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Tradeshows & Events:

Come and Join Us at:

SQF International Conference October 25-27, 2016 Loews Royal Pacific, Orlando, FL Table #12	PACK EXPO Intl. 2016 November 6-9, 2016 McCormick Place, Chicago, IL Booth #720
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(VERIFICATION CONT. FROM PG 1)

An importer's FSVP must be a written plan which provides for three separate processes: 1) an evaluation of the potential hazards of the imported food; 2) an evaluation of the performance of the particular foreign supplier; and 3) a plan for the performance of periodic and appropriate supplier verification activities. Potential hazards may include any biological, chemical or physical hazards related to the food which are reasonably likely to cause illness or injury. If any potential hazards are found, the following is required:

- If potential hazards are identified, the foreign supplier's performance in controlling hazards must be evaluated. Once a foreign supplier is initially evaluated and approved, the supplier's performance must be verified on a regular basis.
- If the potential hazard could cause serious adverse health consequences or death, the minimum standard is that a verification audit must be conducted at least annually.
- If an importer utilizes several foreign suppliers, a separate FSVP must be developed for each.
- If an importer obtains more than one food product from any foreign supplier, an FSVP analysis must be performed for each food product, although there may be some overlap making the process easier.

The type and method of foreign supplier verification processes is flexible and may include on-site audits, sampling and testing, and/or reviews of the suppliers' relevant food safety records. These processes may be conducted by the importer itself or the importer may rely upon other specified types of entities so long as the importer itself reviews and assesses the verification records, including the results of supplier verification activities.



This is where Perry Johnson Registrars Food Safety, Inc. comes in. We have trained assessors across the country and throughout the world that can perform a FSMA readiness assessment. Through this assessment we will use our proprietary checklist to assess your food safety system against the requirements of the Preventative Controls for Human Food Regulation. For more information, please contact PJRFSI at [1-877-663-1160](tel:1-877-663-1160) or via email at pjrfsi@pjrfsi.com. ♦



PJRFSI Welcomes New Employees...

Aggie Adams

Food Safety Program Coordinator



Aggie is the new Food Safety Program Coordinator. She received her Associates Degree in Criminal Justice at Macomb Community College and previously worked at Kelly Services as an IT Security Analyst.

Emmaclare Hurst

Food Safety Program Assistant



Emmaclare is our new Food Safety Program Assistant. She attended Oakland Community College and previously worked as a waitress. She loves camping and spending as much time outdoors as possible.



**Perry Johnson Registrars
Food Safety, Inc.**

755 W. Big Beaver, Suite 1390
Troy, Michigan 48084 USA

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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.

Friday, August 26th

Preventive Control Rule for Human Food –
How to Comply?

Tuesday, September 20th

SQF Code: Edition 8 Changes –
What do You Need to Know?

Guest Speaker:

Leann Chuboff, Senior Technical Director SQFI

Friday, September 30th

Food Storage and Distribution Companies –
A Comparison of GFSI Standards.
Which Standard is right for you?

Friday, October 28th

SQF Edition 8 – What is New?



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:

- **6/24/16** – How to Prepare for a GFSI Audit? Know your Rights as a GFSI Standard Auditee
- **5/25/16** – Foreign Supplier Verification Program (FSVP) Regulation - Regulatory Perspectives