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FSMA's Food Safety Plan

What's Required for a Food Safety Plan?

A food safety plan begins with a thorough hazard analysis (covered in a separate CRC Knowledge Brief) and a corresponding set of preventative controls in each manufacturing facility where food is produced. In order to demonstrate that the controls are effective, documentation of procedures to eliminate real and potential hazards are required, with regular updates. The result is a Food Safety Plan containing widely recognized safety protocols but with elements specific to each manufacturer.

What Form does the Food Safety Plan Have to Take?

Under FSMA, the FDA regulations require each food manufacturer or processors of human and animal food to create a written food safety plan. The agency has already suggested that when FDA inspectors start making their rounds late in 2016, they will ask to see the plant's food safety plan either in electronic form or hard copy format.

What Must Be Included?

The food safety plan must cover all the foods that the facility manufactures, processes, packs or ships. It must include these preventative steps to be considered complete and effective:

Written Hazard Analysis – Documenting known hazards, as well as those that are “reasonably foreseeable.”

Written Preventive Controls – Putting down on paper (or electronically) the steps your company is taking to address the safety hazards and to insure a manufacturing process that is closely monitored for safety.

Written Supply-Chain Program – Manufacturers will want to see written proof that all of their suppliers also have preventative controls in place to eliminate the risk of contamination.

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Written Procedures for Monitoring Preventive Controls – How your company is monitoring the production process.

Written Corrective Action Procedures – Planning in advance what to do in case a problem arises.

Written Verification Procedures – Insuring that you are maintaining a constantly updated system to verify that preventative controls are in place and being constantly monitored.

Written Recall Plan – What to do if your company faces a Class I or II FDA food recall.

If the Point is to Reduce Recalls, Why A Recall Plan?

In the past, when a recall was needed, the offending company typically might scramble to track down the suspected product, where it was being sold or shipped, and how and when to retrieve the product. Delays were not uncommon, which often resulted in consumer exposure to contaminated product, to say nothing about lost sales and damaged reputation to the offending manufacturer.

Under the FSMA Food Safety Plan, by contrast, food manufacturers are required to lay out a detailed and specific recall plan and have it on hand in the event of an actual recall. Previous experience with food recalls demonstrates that companies that had a recall plan in place were much more capable of controlling the crisis, implementing the recall more quickly, and potentially saving consumers from illness or more serious consequences.

FSMA requires that the food safety plan be reviewed every three years or when there are changes in formula, processes, new equipment or when new scientific information becomes available.

Timetable

In a word, the timetable to produce a comprehensive Food Safety Plan is now. Even though such plans include many elements and procedures that must be documented, the FDA is giving little leeway to the food industry: the agency wants the plans in place by the Fall of 2016.

Are There Any Examples of Preventable Controls?

Yes. Many food manufacturers and suppliers have implemented floor management systems to insure that only food safe materials come anywhere near the food production line. One such plan is CRC Industries' StopLight™ Food Safety program for MRO chemicals. StopLight uses color-coded packaging to insure that chemicals are categorized and separated by their intended use. Here's more [information](#).