

# WHAT IN THE WORLD IS A FOOD SAFETY PLAN?

BY JOEL PECORARO

**T**he Food Modernization Act has multiple regulations, but a major component is the requirement to maintain a documented "Food Safety Plan" and be able to demonstrate conformance to the plan with clearly documented records. Regardless of the size and complexity of your operation, if you haven't already started your food safety plan there are some fundamental components that make up a good plan including:

**1. Recall process:** You will need to define the specific activities and responsibilities relating to recalling potentially harmful or compromised product. At a minimum you need to consider who in the organization is involved in the recall process, how you will communicate any recall information to affected parties and to minimize the ambiguity of a recall consider defining the types of issues that would potentially warrant a recall.

**2. Trace process:** If your customer was to issue a recall notice right now could you trace the load back to the source? A good food safety plan defines exactly how that traceability process would work and ensures that you can track down all of your own internal inspection/verification records that were maintained for the load. Keep in mind that if you are utilizing subcontractors you have a responsibility to make sure their system allows for the same level of traceability.

**3. Hazard Analysis and Critical Control Points:** HACCP programs have been around since the early space program and are still the best analytical tool available to identify potential safety risks in the entire logistics process. HACCP forces the identification of potential problems before they occur and the development of an action plan to both prevent and react in the event of an occurrence.

A major concern with many HACCP plans is trying to realistically identify potential problems. The legislation defines a potential as a "hazard for which a prudent person who, as applicable, manufactures, processes, packs, transports or holds food would establish controls because experience, illness data, scientific reports or other information provide a basis to conclude that there is a reasonable possibility that in the absence of those controls the hazards will occur in the type of food being manufactured, processed, packed, transported or held."

A realistic hazard is a chiller malfunction on a trailer while a satellite crashing to earth and destroying the trailer is highly unlikely.

**4. Record keeping procedures:** Under the new regulations



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all impacted firms would have to make food safety records available to FDA inspectors. Your company needs to identify the records that are maintained; storage duration, storage location and how records are protected (hard copy and electronic). Keep in mind that the bill would grant the FDA authority to compel the production of documents.

**5. Science based performance standards:** Safety specifications and requirements need to be developed with some scientific rationale. The FDA websites and trade journals can provide valuable scientific data relating to contamination controls. If no scientific data is available consider creating your own studies based on industry accepted practices.

**6. Supply control:** Your system needs to address the initial and ongoing evaluation of your supply and/or subcontractor services. Ensuring your supplier/subcontractor base is meeting your expected food safety requirements is a key component of a good food safety plan. For example, if you are using contract haulers, do those haulers follow the same safety rules as your own employees?

Try to address any certification programs or service expectations a new supplier/subcontractor must meet before you enter into a business relationship.

**7. Preventive action plans:** Every company, if they intend to stay in business, has a system for dealing with upset customers. A component of an effective food safety plan is the proactive steps that are being taken to prevent food contamination. Many of these steps can be addressed in the HACCP plan.

**8. Good manufacturing practices:** The word manufacturing is interchangeable with good logistic practices. Most successful

firms already have informal programs in place to satisfy customer demands. The difficulty is many do not have documented systems where best practices are clearly defined.

At a minimum consider the following areas in the program:

- Steps for making sure food in transit is maintained at appropriate temperatures;
- Pallets used for food in transit are of good quality;
- Sanitary measures are followed in the loading and unloading of foods;
- Food in transit is closely monitored for pests;
- Vehicles used to transport foods are sanitary and in proper working condition;
- Trailer security measures.

Effective food safety plans can take time to develop, document and implement so it is probably not in your best interests to wait until you are notified that you will have a visit from your friendly FDA inspector. ☘

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