

FOOD SAFETY CULTURE AND COMPETENCIES

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What is a FOOD SAFETY CULTURE?

- An awareness of the hazards and risks associated with manufacturing a product for human consumption. **Would you eat this?**
- Food Safety is recognized as a core value by both management and employees.
- Part of Management Responsibility



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Strong Food Safety Culture vs Weak Food Safety Culture

STRONG

Food safety expectations and values clearly communicated.

Standard operating procedures are clearly communicated and followed.

WEAK

Core values are not well established and do not include food safety.

Tribal knowledge is the norm.



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Benefits of a Food Safety Culture

Brand Protection

Consistent output

Pro-active vs Reactive atmosphere

- No longer putting out fires constantly
- Owners, Managers, and Directors can concentrate on strategic vision instead of day-to-day crises



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How to Attain a Food Safety Culture

It starts with MANAGEMENT COMMITMENT

Management must lead by example

- Follow all food safety regulations
- Training
- Establish a food safety company policy
- Set goals and celebrate successes



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Competencies – What Does it Take to Have a Strong Food Safety Culture?

Management Commitment

- Management must be dedicated to food safety.

Food Safety Team

- A cross functional team tasked with risk analysis and preventive controls.
 - This is typically the HACCP team.

Strong Food Safety Team Leader

- Background or education in food safety
- Authority to make decisions and implement programs

Knowledgeable Employees

- Employees must understand their role in food safety



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How do I get started?

Don't re-invent the wheel

- GFSI and FSMA have provided guidelines to creating and maintaining the proper culture.
- The Global Food Safety Initiative (GFSI)
 - Food safety management programs globally approved and proven to be effective.
 - Certification Program
 - Multiple options (SQF, BRC, FSSC 22000) – Choose the one best suited for you.
- Food Safety Modernization Act (FSMA)
 - FDA requirements for food manufacturers.
 - Include preventive controls, recall procedures, and allergen awareness.



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Hazard Analysis Critical Control Point (HACCP)

Risk Based Approach to food safety

- Assess hazards associated with ingredients and processes
- Identify points in the process where hazards can be mitigated (control points)
- Define limits for those control points and monitor them
- Identify corrective actions if something goes wrong
- DOCUMENT, DOCUMENT, DOCUMENT
- Validate and verify



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Pre-requisite Programs

Documented Procedures for:

- Building, Premise, Equipment, and Warehousing
- Utilities and Waste Disposal
- Purchased Material
- Cross contamination
- Sanitation and Pest Control
- Personnel hygiene and GMPs
- Rework
- Food Defense



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Management Systems

Be prepared with documented procedures for:

- Emergency Preparedness
- Business Continuity
- Recall
- Product Development
- Vendor Control
- Hold and release
- Environmental Monitoring
- Preventive Maintenance
- Document Control



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Training

Employees must have training on:

- Food Safety Policy Statement (Management Commitment)
- HACCP
- Personal Hygiene and GMPs
- Sanitation
- Allergens
- Food Defense



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Basic Good Manufacturing Practices for Food



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Development of Food GMP

1906 Pure Food and Drugs Act

1933 Overhaul Act

1938 Food, Drug & Cosmetic Act

- Insanitary conditions sufficient to prove adulterated
 - Section 402 (a)(3) specifies that food has been manufactured under such conditions that it is unfit for consumption.
 - Section 402 (a)(4) considers that food may be adulterated if it is prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth or rendered injurious to health.



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Implementation of GMPs

21 CFR Part 117 (originally part 128 until 1969)

- 21 CFR 106 Nutrients for Infant Formula
- 21 CFR 113 Thermal process low-acid canning
- 21 CFR 114 Acidified Foods
- 21 CFR 129 Bottled Drinking Water



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GMP

General Provisions (subpart A)

Buildings and Facilities (subpart B)

Equipment (subpart C)

Production and Process Control (subpart E)

Defect Action Levels (subpart G)



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General Provisions (A)

Sections

- Terminology “shall” vs. “should”
- Personnel
 - Hygiene/Cleanliness, Clothing, Jewelry, Glove Maintenance, Hair Restraints, Personnel item store, Eating/Drinking
- Education/Training
 - Supervisory personnel ensure compliance
- Exemptions to section A
 - harvest, store or distribute raw agricultural commodities



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Buildings and Facilities (B)

Maintenance and Grounds

Sanitary Operations

Sanitary Facilities/Control

Requirements range from specific to general



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Equipment (C)

Design

Construction

Maintenance of Equipment

Maintenance of Utensils

Automatic temperature control regulation w/ Alarm



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Production and Process Controls (E)

General Sanitation Process / Controls

Monitoring of Physical Factors

- Critical Control Points (time, temp, humidity, pH, flow rate and acidification)

Warehousing and Distribution

- Conditions to prevent

Depends on the risk of the product



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Defect Action Levels (G)

Filth and Extraneous Material set by FDA

- Insects
- Mold
- Presence of rodent

Mixing contaminated food with suitable batch renders both batches as adulterated.



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Elements of a Successful Food Safety Management System

HACCP Plan

Pre-requisite Programs

- GMPs, Pest Control, Etc.

Preventive Controls

- Allergen Control, Vendor Control, Process Control, Sanitation Control

Management Systems

- Training, Recall, Business Continuity, Preventive Maintenance

MANAGEMENT COMMITMENT



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Resources

Have a consultant perform a gap analysis

- Check with your State Manufacturing Extension Partnership
 - Wisconsin – WMEP
 - Illinois – IMEC
- Certification Bodies
 - SGS



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