



HACCP INTERNATIONAL

FOOD SAFETY BULLETIN

ISSUE 11 2016

It's not all hot air!

Halton puts food safety and energy under the spotlight

FLOORING

Getting it right from the bottom up

MICROBIAL TESTING

Reducing the guesswork

GLOBAL BURDEN OF FOODBORNE DISEASES

An Asian perspective

Halton



Update from HACCP International's office in The USA



Debby Newslow, Vice President - Americas
gives you her take on equipment and material safety as the
**FSMA FDA Preventive Controls for Human Foods
(21 CFR 117) becomes a reality**

The wait is over! It is time to comply.

'Title 21 of the Code of Federal Regulation Part 117 –
Current Good Manufacturing Practice, Hazard Analysis, and
Risk-based Preventive Controls for Human Food' has become a reality!

This regulation is made of several parts, most of which have been released or scheduled for release in the next few months.

This regulation applies to facilities that manufacture, process, pack or hold human food as defined in 21CFR 117.1. Its focus is on prevention. The days when “we didn’t have time to do it right, but had time to do it over” are gone forever. We can no longer learn from our mistakes, we must not make the mistakes, because these mistakes can and do result in serious food safety events.

This concept requires a strong focus on critical programs that prevent food safety events rather than reacting to problems as they occur. Preventive controls not only include Critical Control Points but also for controls for some of the hazards that we use to address in our prerequisite programs (PRPs). Examples include sanitation, allergen control and supplier management.

The timing for having the opportunity to utilize HACCP International’s certification in the United States is perfect. It is so very important that food manufacturers have the assurance that there are standards that apply the same “science” and “experience” based analysis related to ingredients, packaging, and finished products to product contact surfaces (equipment, materials, chemicals, etc.) and to food safety and quality critical services (i.e. pest control, calibration, etc.). Such products need to be subjected to an auditable due diligence process and often this can be difficult for manufacturers to do or be beyond their expertise. That’s why this 3rd party certification is so useful. Many suppliers of such products carry this certification in The USA.

Some of the world’s best known brands carry this certification here in the United States – **Silikal Flooring, 3M, Dyson, BAF, Bayer, SCA Hygiene, Kimberly Clark, Dyson, Testo and Flowcrete** to name a few. These companies have successfully applied for certification – demonstrating their commitment to the food safety and the food industry by providing food businesses with that due diligence.

All aspects of the process must be considered during HACCP International’s food safety evaluation. Dave McNeece,

Managing Director of the aforementioned Flowcrete Americas stated in his article “The Role of the Floor in a HACCP Food Safety Management System” (Food Manufacturing, January/February 2016) that it is critical to get the floor right because this is “a critical part of the HACCP process. Otherwise, it can present a variety of challenging health and safety concerns. He said “One of the most common findings during our food safety audits are decayed floors. Water puddling allowing organic matter to build up in crevices, drains, walls, under and in cracks in the floor can make controlling and eliminating hazards an impossible challenge. So many times the operations repair the floors but within months, the condition is right back to where it was or worse. When my clients ask me what should we do? It is great to be able to recommend a company that I know has had their floor tested and approved that relates directly to food safety.”

Flooring is one example. The equipment used to clean with is another. Always think about cross contamination. Can a situation cause or contribute to a cross contamination issue. Many organizations now have color coded cleaning utensils such as brooms, buckets, mops, etc. This type of system usually separates between, raw, finished products and external use. It is a very important tool in prevention. But is just color coding enough for prevention? Is the equipment themselves safe? How are they constructed? It wasn’t too long ago that one of my clients discovered that their magnet had caught several “staples”. After a lengthy investigation, it was found that the bristles on the brushes were attached by staples. Evidently through use and exposure to cleaning chemicals, the brushes started to deteriorate. Do we now as a food product manufacturer have to do an on-site audit of the brush supplier to be sure that their product is safe for our equipment and our product? Could it deteriorate contributing to a hazard to our system? Maybe that would work for some larger companies, but it would most likely be very costly and do we have the “expertise” and the “standard” to audit with? It is great to be able to choose a supplier that has been evaluated

based on specific product standards.

Food safety management programs including those schemes approved by the Global Food Safety Intuitive (GFSI) state that the hazard analysis must include product contact surfaces and processing aids. This, in most instances, is a very long list including such items as lubricants, cleaners, cleaning utensils, equipment surfaces, floors, walls, drains, and much more. The advantage of being able to choose items that have the HACCP International seal doesn't just tick the 'due diligence box' but also builds confidence and efficiency into our food safety HACCP programs.

In being "proactive", we must examine every aspect of the process without exception. Time is a precious commodity in today's world, the continued safety of our food products is vital. Our role at HACCP International-Americas becomes more critical every day. We are fortunate to have the support of our worldwide partners including the vast expertise and experience that they are sharing with us here in America. In anticipation of more companies joining our global initiatives, we are expanding our HACCP International Technical Team so that we can continue to provide our same level of expertise and efficiency. We look forward to hearing from our readers. No matter where you are in the world, please do not hesitate to contact us either by email to myself (debby.n@haccp-international.com) or Bill Dubose (bill.d@haccp-international.com). You may also contact us in our Americas corporate office at 407-992-6223.

Read more about product contact surfaces and HACCP International in Debby's latest book *Food Safety Management Programs* available at (www.crcpress.com). ❄