

**2017 Annual Meat Conference**  
**Questions and Answers – FSMA: What the Meat Department Needs to Know**  
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**What type of verification would be considered compliance in processing plants as it relates to food defense?**

Food defense verification activities should include verification that food defense monitoring, corrective actions, and mitigations strategies are being conducted appropriately and according to written procedures, and that appropriate records to document all those activities are reviewed.

**Would BRC of the GFSI meet or exceed the requirements of the FSMA and suffice in compliance?**

Many of the requirements may be met or exceeded; however, it is important to reformat all that information into the required Food Safety Plan as described by the FSMA rule.

**Please provide more clarity on the differences between FSMA and HACCP. Will HACCP still be relevant or superseded by FSMA?**

Much of HACCP is contained within the FSMA requirements, and the established process controls implemented in HACCP will not significantly change. As a Food Safety Plan is implemented, however, certain additional controls, such as Sanitation Preventive Controls, Supply Chain Preventive Controls, and Allergen Preventive Controls, will also be required. So much of HACCP will be “nested” in a Food Safety Plan, but additional components will be required.

**At what level in the organization will PCQI be required at the corporate, division and/or store level?**

The PCQI is responsible for design and implementation of the Food Safety Plan, so the level in the organization will be less important than making sure the PCQI has the authority and ability to carry out responsibilities.

**Why would exemption from rules be based on distance or sales volume? Seems arbitrary and risky.**

Agreed. However, very small producers who will not be affecting a large volume of customers outside of a small distribution area are probably a lower risk for a major outbreak, and there is concern that implementation of these regulatory requirements could place too great a burden on a small entity.

**If rules are not international, how is verification accomplished in foreign country from which food is being delivered?**

The Foreign Supplier Verification Program is designed to address those concerns and provides a framework for providing verification of imported products. The designated importer is required to verify that a Food Safety Plan and preventive controls are implemented as required of the US food industry.