

ANNUAL
MEAT 2017
CONFERENCE

FEBRUARY 19-21, 2017
HILTON ANATOLE
DALLAS, TEXAS



FOUNDATION FOR
MEAT & POULTRY
RESEARCH EDUCATION

FSMA – What the Meat Department Needs to Know

Gary R. Acuff
Texas A&M University
Department of Nutrition & Food Science

What is FSMA?

FDA FOOD SAFETY MODERNIZATION ACT



- Touted as “sweeping changes”
- Prevention
- Enforcement
- Impacts manufacturing, processors, distribution centers, importers, transportation

What is FSMA?

FDA FOOD SAFETY MODERNIZATION ACT



- Touted as “sweeping changes”
- Prevention
- Enforcement
- Complex and complicated, but the basics are not new or difficult

Risk-based Preventive Controls

- Focus on what matters most for food safety
- Preventive, not reactive
- Work in conjunction with and supported by other programs like Good Manufacturing Practices
- Designed to minimize the risk of food safety hazards

FSMA Rules in Our Discussion Today



Federal Register

- Preventive Controls for Human Food
- Preventive Controls for Animal Food
- Produce Safety
- Foreign Supplier Verification Programs
- Transportation
- Food Defense

Practical Application at Retail

- Seek out necessary training
 - QI or PCQI?



Qualified Individual

- A person who has the education, training, or experience necessary to perform a required activity.
 - Foreign Supplier Verification Program (FSVP)
 - must read and understand the language of any records requiring review.

Preventive Controls Qualified Individual

- A qualified individual who has successfully completed training in the development and application of risk-based preventive controls at least equivalent to that received under a standardized curriculum recognized as adequate by FDA or is otherwise qualified through job experience to develop and apply a food safety system.

Preventive Controls Qualified Individual



Practical Application at Retail

- Seek out necessary training
 - QI or PCQI?
- Written Food Safety Plan?
- Impact of supply chain controls (chain of custody)
- Transportation

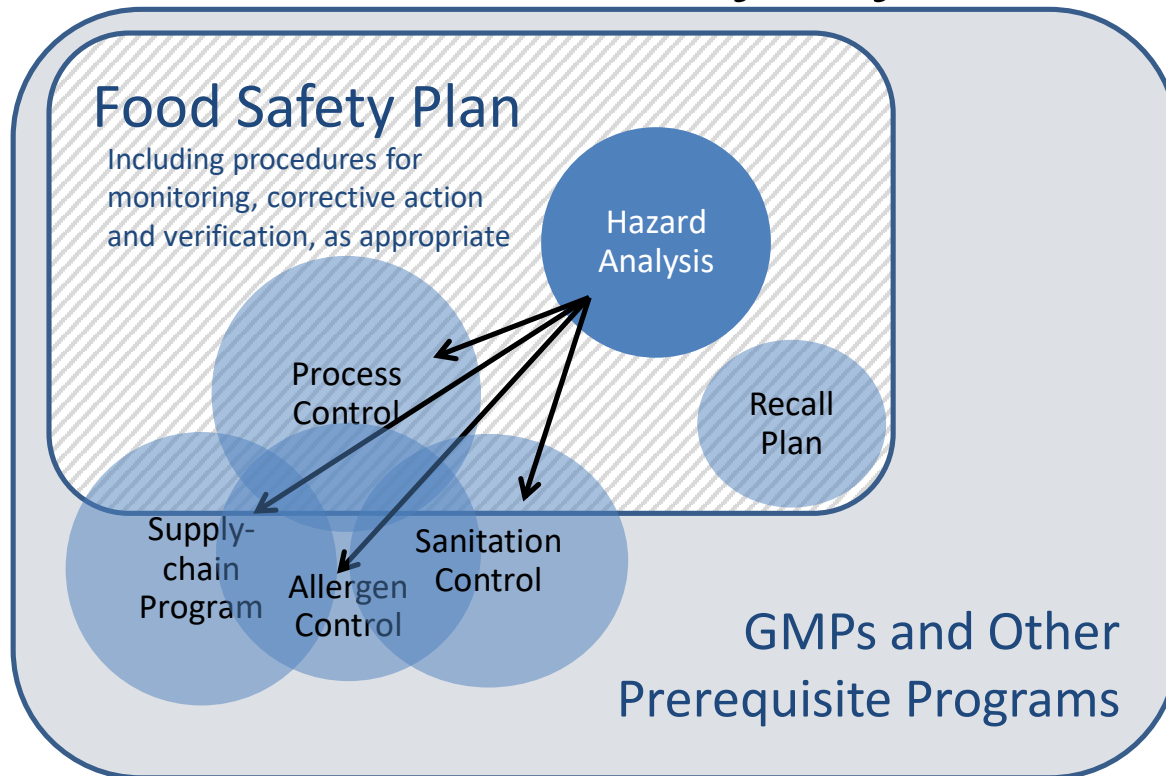
Preventive Controls – Human Food

- Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food

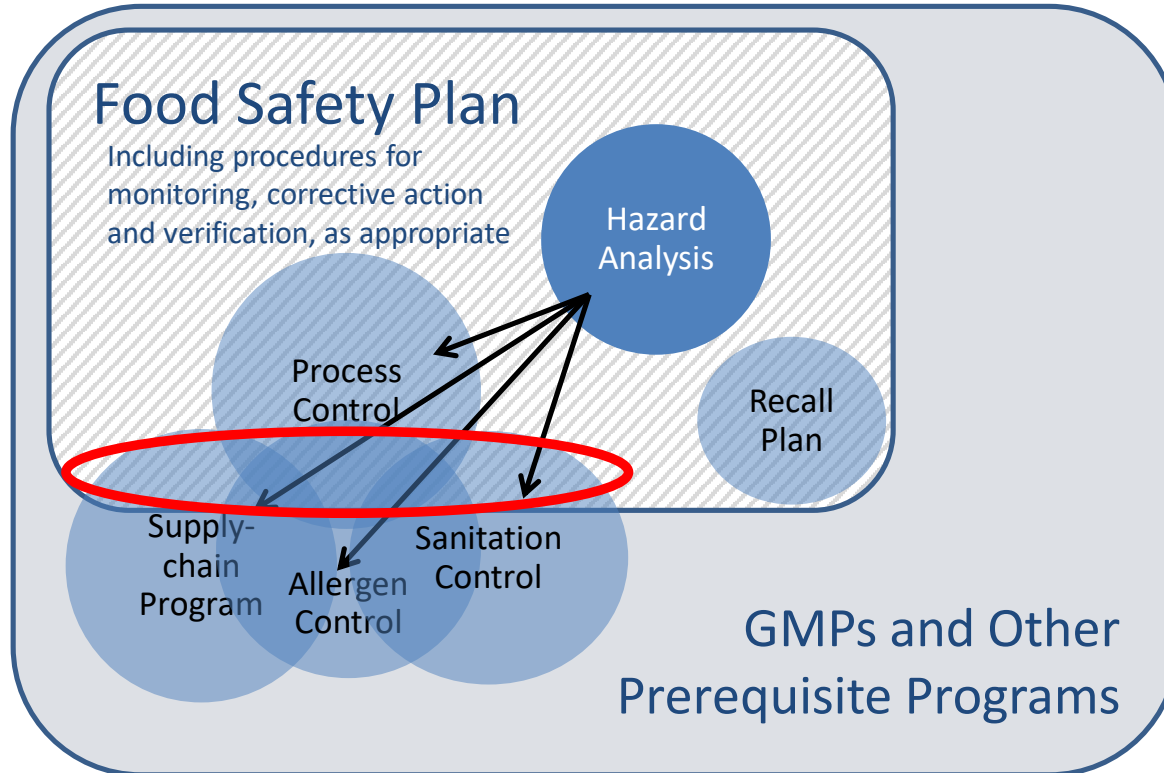
Preventive Controls – Human Food

- Primarily applies to processing facilities
 - Possible impact on warehouses or distribution centers
- Food processed on-site
- Food Safety Plan required
 - Process controls, allergen controls, supply-chain controls, sanitation controls

Preventive Food Safety Systems



Preventive Food Safety Systems



Who Controls The Hazard?



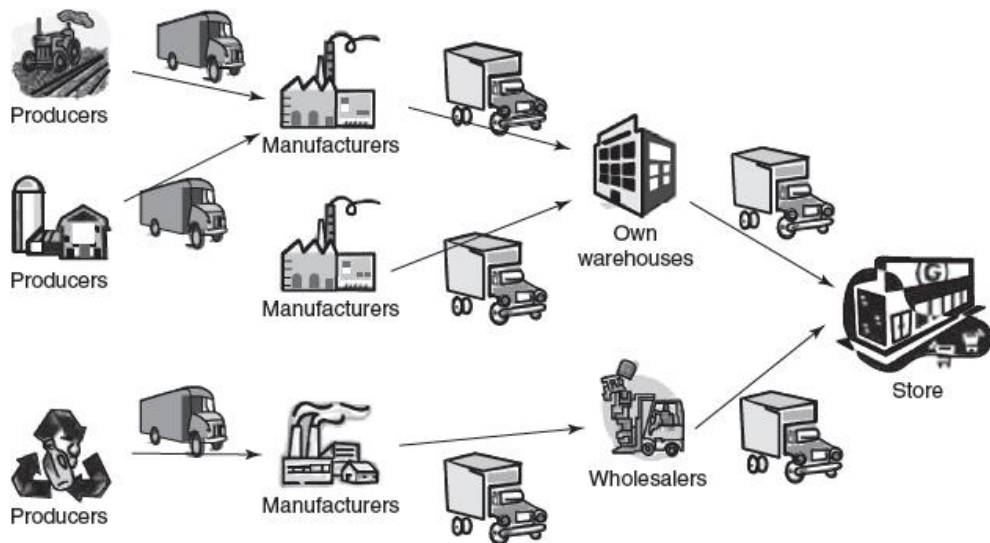
- Manufacturer, processor
- Raise the animal
- Grow the food

- Manufacturer, processor

- Manufacturer, processor or preparer

Preventive Controls – Human Food

- Supply-chain controls may impact retail
 - Supplier has a hazard requiring a preventive control



Preventive Controls – Human Food

- Warehouse or Distribution Center
 - Depending on type of food
 - Exposed or packaged?
 - May be subject to Preventive Controls rule

Preventive Controls – Human Food

- Private label
 - Manufacturing facility or central kitchen
 - Subject to Preventive Controls rule



Preventive Controls – Animal Food

- Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals
- Unlikely to affect retail



Produce Safety

- Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption



Produce Safety

- Applies to produce consumed raw
 - Safe production, harvesting
 - Soil amendments
 - Worker hygiene
 - Water
- Exemptions for local (275 miles, <\$500K) or <\$25K sales

FSVP

- Foreign Supplier Verification Programs (FSVP) for Importers of Food for Humans and Animals



FSVP

- The regulation requires importers to verify that food they import into the United States is produced in compliance with the hazard analysis and risk-based preventive controls and standards for produce safety provisions of the Federal Food, Drug, and Cosmetic Act (the FD&C Act), is not adulterated, and is not misbranded with respect to food allergen labeling.

FSVP

- The regulation **requires importers** to **verify** that food they import into the United States is produced in compliance with the hazard analysis and risk-based **preventive controls** and standards for **produce safety provisions** of the Federal Food, Drug, and Cosmetic Act (the FD&C Act), is **not adulterated**, and is **not misbranded** with respect to food allergen labeling.

FSVP

- Imported foods
 - The U.S. food importer who is responsible for complying with the FSVP requirements must be identified at entry
 - Who controls the hazard?
 - Similarities to Supply-chain Preventive Controls
 - Private label?

FSVP

- Importer – “U.S. owner or consignee” of the food at entry
 - Retailer (be careful; don’t get defaulted)
 - Intermediary
- The importer should establish a **written program** describing steps taken to assure a foreign supplier is controlling hazards

Transportation

- Sanitary Transportation of Human and Animal Food



Transportation

- Not just FDA-regulated products
 - Meat and poultry included (HACCP)
- Products that require temperature control for safety

Transportation

- Shippers
 - Carriers
 - Receivers
 - Trucks, railcars
- Condition, cleanliness/sanitation
 - Sanitation procedures specified
 - Temperature requirements specified
 - Temperature control and monitoring
 - Inspection before loading
 - Handwashing facilities

Food Defense

- Mitigation Strategies to Protect Food Against Intentional Adulteration



FBI photo of man who sprayed rat poison on grocery store food

Food Defense

- Primarily manufacturers
- Prevention of large scale attack
 - Not product tampering
 - Minimal impact on retail

Recordkeeping/Documentation

- Document everything...
 - Temperature records
 - Tracing
 - Any on-site processing

Conclusions

- Greatest impact on retail
 - Transport
 - FSVP
 - Supply-chain preventive controls
 - Documentation and recordkeeping



Confused?
Let's Discuss...

Resources

FSMA regulations and guidance documents

[FDA Webpage and link to Rules](#)

FMI FSMA Resources (all in one place)

<http://www.fmi.org/government-affairs/regulatory/food-safety---fsma-resources>

FSMA Sanitary Transportation Resources

[Sanitary Transportation from Global Cold Chain Alliance](#)

GMA FSMA Resources

<http://www.gmaonline.org/issues-policy/product-safety/food-and-product-safety/food-and-product-safe/>