

Chapter 1

INTRODUCTION TO FSPCA PREVENTIVE CONTROLS FOR HUMAN FOOD COURSE

Preventive Controls Include More Than HACCP (cont'd; Slide 1-5 a)

- Addition of Preventive Controls to traditional CCPs (that are typically process preventive controls)
 - Allergen PC
 - Sanitation PC
 - Supply-chain PC
- Parameters and values (instead of critical limits)
 - Because some PC will not have precise critical limits (e.g., a clean surface)
- Addition of “**Corrections**” to Corrective Actions
 - Because some PC may not need all the required elements for Corrective Actions (e.g., sanitation lapses can sometimes be corrected by re-cleaning equipment without holding product if no product was produced on the equipment)



Preventive Controls Qualified Individual Definition (Slide 1-7 a)

- May be a company employee or an outside consultant
- Responsible for:
 - Preparation of the Food Safety Plan
 - Validation of the preventive controls
 - Records review
 - Reanalysis of the Food Safety Plan



Qualified Individual Definition (Slide 1-7b)

- Includes temporary and seasonal workers who manufacture, process, pack, or hold food (21 CFR 117.4(b)(2)-(d)) and
 - Must have the education, training, experience necessary as appropriate to the individual's assigned duties, **AND**
 - Must receive training in the Principles of Food Hygiene and Food Safety, as appropriate to the food, the facility, and the individual's assigned duties.
- Training records on food hygiene and food safety are required and must be kept, as appropriate
- Supervisors must ensure compliance.



Can A PCQI Train Its Own Staff? (Slide 1-7 c)

- Yes (as per FDA TAN response)
 - Use the FSPCA course materials
 - Issue their own company certificate unless the PCQI is also a FSPCA Lead Instructor who may issue FSPCA certificates
- It is each facility's management responsibility to ensure that the PCQI is adequately trained to perform these job functions
 - Through the FSPCA Preventive Controls for Human Food Course
 - Or qualified through job experience to develop and apply a food safety system (or has the knowledge at least equivalent to that provided through the standardized curriculum)

21 CFR 117.180(c)(1)



Food Safety Plan vs. HACCP Plan (Slide 1-7 d)

Food Safety Plan	HACCP Plan
Hazard analysis	Hazard analysis
Preventive controls (process, sanitation, allergen, supply-chain, recall plan, others)	CCPs to control food hazards
Process controls (have parameters and min/max values)	Critical limits
Monitoring	Monitoring
Corrective actions	Corrective actions
Verification	Verification
Records	Records



Monitoring, Corrective Actions, and Verification in the Food Safety Plan should be used appropriately to ensure the effectiveness of the preventive controls, taking into account the nature of the PC.