

Chapter 6

PRELIMINARY STEPS IN DEVELOPING A FOOD SAFETY PLAN FOR HUMAN FOOD

Preliminary Steps Objectives

In this module you will learn:

- Preliminary steps **necessary** for developing a Food Safety Plan including:
 1. Assemble the food safety team
 2. Describe the product and its distribution
 3. Describe the intended use and consumers of the food
 4. Develop a flow diagram and describe the process
 5. Verify the flow diagram on-site

Question: How many have taken a HACCP course before?

Refresher: These preliminary steps are a take-off from HACCP that follows the guidelines and criteria set by Codex Alimentarius and the National Advisory Committee on Microbiological Criteria for Foods (NACMF)



Assemble the Food Safety Team (cont'd) (Slide 6-1 a)

Question: Do you document choosing your food safety team members for your company?

Answer: Yes



Assemble the Food Safety Team (cont'd) (Slide 6-2 b)

Small companies may have only one individual and not a food safety team.

Question: *Is it acceptable to have only one member in the food safety team?*

Answer: *Yes. It's not ideal but the company could invite external members such as other company owners, university faculty, consultants.*

Question: *Should that only one individual be a PCQI for records review and oversight?*

Answer: *Yes*



Assemble the Food Safety Team (cont'd) (Slide 6-2 c)

Question: *Can a PCQI teach this Preventive Controls for Human Food course to its own or other company staff?*

Answer: *Yes but the company or the PCQI will have to issue its own Certificate of Completion. FSPCA certificate will not be possible.*

Question: *Will a Certificate of Completion that is not issued by FSPCA satisfy investigators, inspectors, and auditors?*

Answer: *Most probably not unless you can convince them that you have the training, education, and experience to develop a FSMA Food Safety Plan.*



Assemble the Food Safety Team (cont'd) (Slide 6-2 d)

Question: *Some Department of Health inspectors ask for my HACCP plan and are not familiar with the FSMA Food Safety Plan. What do I do?*

Answer: *Peter Oshiro, Manager for the Sanitation Branch/Food & Drug Brank of the HI Department of Health, advised me that it doesn't matter what it's called as long as it has your hazard analysis, hazards, controls, implementation records, and recall plan. Sounds like a FSMA Food Safety Plan.*

Question: *Costco and some auditors insist on a HACCP Plan.*

Answer: *If you are being audited under GFSI standards, your auditor will ask for your HACCP Plan. FSPCA and GFSI are communicating to harmonize their systems.*



This slide is adapted from
Appendix 3-14.

E.G. Food Company Example

– Egg Omelet

- Data sources for cook temperature show safe cooking temperature of eggs
 - *FDA 2013 Food Code*
 - 158°F (70°C) for <1 second adequate for cooking raw egg-containing products that are not prepared for immediate service
 - Published study (Lowe 1937)—temperature effect on eggs has been known for a very long time
 - Egg coagulates at 158°F (70°C) and higher temperatures if milk is added
- Firm's data
 - Company prefers congealed omelet as seen on the omelet surface as their end of cook.
 - Surface temperature of congealed omelet was always >158°F. IR thermometer is used.
 - Minimum actual product internal temperature is 162°F (72°C) when omelet surface temperature is $\geq 158^\circ\text{F}$.
 - Therefore, company set critical limit at $\geq 158^\circ\text{F}$ (70°C)



E.G. Food Company Example

ADDITIONAL INFORMATION about the E.G. Food Company.

Omelet Process

- Omelet batters are prepared.
- Omelet batters are poured to individual pans, placed on hot cooking surface, and are cooked from the bottom up.
- IR thermometers directed on the middle top surface of each omelet indicate full cooking if at $\geq 158^{\circ}\text{F}$.
- Each cooked omelet is removed from each pan by inverting.
- Each cooked omelet is manually transferred to the Assemble/Wrap area.
- Each omelet goes to the spiral freezer after wrapping.



See Appendix 3 (A3-3)

(Slide 6-4 bottom a)

E.G. Food Company Example

Food Safety Team (see Appendix A3-3)

Name	Position	Applicable Training (Records are in personnel file)
I.N. Charge	Plant Manager	In plant training
F.S. Leader*	QA Manager	FSPCA class
E.F. Ency	Production Supervisor	In plant training
I.M. Clean	Sanitation Supervisor	In plant training
P.H. Books*	Consultant, PH Books Consulting Service	M.S. & Ph.D. in Food Science and FSPCA lead instructor

EG Food Co has 4 employees, all with food safety training and use references such as FDA guidance documents. They use a consultant to ASSIST with development of the Food Safety Plan, annual review, for changes. They use recommendations from their chemical supplier on appropriate cleaning and sanitation compounds and procedure.



Describe the Product and Its Distribution (cont'd)

(Slide 6-5 a)

- Important to understand factors that can influence pathogen growth
 - pH
 - Water activity
 - Preservatives, if any



Describe the Intended Use and Consumers (cont'd)

(Slide 6-6 a)

Some questions that the Food Safety Team should ask:

- What is the intended use of the product?
 - Retail
 - Foodservice
 - Further processing
- Is there potential for mishandling and unintended use?
- Are handling and preparation procedures required for the end users?
 - RTE
 - Cook or reheat
- Is the product specifically for the immuno-compromised?



Product Description = Technical Data Sheet (Slide 6-8)

- Product description: general description of the product, processing, assembly, pH, water activity, other properties intrinsic to safety
- Ingredients: list of ingredients
- Packaging: general description
- Intended use: the normal use
- Shelf life: intended and relevant to potential microbial growth
- Labeling instructions: relevant to food safety (refrigeration, cooking)
- Storage and distribution: method of storage (refrigerated, frozen, ambient); method of distribution

Note: Fillable WORD and Fillable PDF forms are on my website

<http://foodsafetyhawaii.org/additional-course-materials/>

Appendix 2.



FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

E.G. Food Company Example (Slide 6-11 a)

- Process description is useful when written.
- May be used to train employees
- There is no REWORK in this company.
- See *pages A3-6 to A3-8* for the E.G. Food Company example
- It is also helpful to prepare a schematic diagram of the facility to demonstrate the geographic relationships of non-GMP areas to GMP and restricted areas. Some inspectors and auditors ask for these diagrams!



Preliminary Steps Summary (cont'd) (Slide 6-13 a)

- If you have >1 product, prepare one Food Safety Plan at a time. Then have it reviewed by a 3rd party before doing another Plan.



EXERCISE

1. Each participant will give one lesson or “key learning” from the chapter. Share your lesson with your group and the class.
2. Count off 1 to 4. You will form 4 groups, one group per Model Food, ideally no two from the same company.
3. Use the Model Food that you picked. It already has a product description, distribution, intended use, consumers defined flow chart, and process narrative. DO NOT GO BEYOND WHAT WE TAKE IN CLASS.

Remember—This is NOT an exam. I will not grade you for these exercises. Just participate!



EXERCISE (cont'd)

4. Using your Model Food, write on easel pad paper
 - Name of your company, address, etc. (real or fake)—FORM PROVIDED
 - Create the members of your Food Safety Team (real or fake)
 - Claim wall space where you'd post your group results.
 - Consult your Model Food Plans **UP TO THE FLOW DIAGRAM ONLY.**
5. Continue with the preliminary steps information (p. 6-13) and apply to your Model Food product. Think, don't copy!
 - a. Would you group or separate the products in your sample plan? Why?
 - b. Know the product and its distribution
 - c. Get familiar with the intended use and its consumers
 - d. Review your flow diagram and describe the process
 - e. Verify the flow diagram (***What's in the manual may not be correct***)
 - f. Discuss as a group. OK to make changes, just as you would in real life.



EXERCISE (cont'd)

5. Everyone participates on a rotating basis
 - As a Recorder
 - As a Reporter
6. Don't be afraid to write on your manuals.
7. Keep your Model Food Plans. You will use these for the rest of the course.



Assembling the Food Safety Team

Firm Name:

Contact Name:

Page

Firm Address:

Contact Telephone/fax:

Plant #:

Contact Email:

Supersedes:

Food Safety Team Members

Name	Department	Title	Training

Food Safety Team Alternates

Name	Department	Title	Training

Management Signature

Date



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