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Food Safety Is Not a Mystical Journey

Each and every day for the last year, we in the food industry have been bombarded with announcements about the Food Safety Modernization Act: “Tune into this webinar and hear Dr. I. M. Wise tell you how to prepare your company to meet the requirements of the act,” and more. But, let’s stick to what we should be doing—producing safe and wholesome foods—and worry about the Food Safety Modernization Act after the regulations that are being developed to enforce the act are completed and monies have been allocated to provide enforcement. We need to focus on our current food safety programs, including prerequisite programs, and look at how they might be improved. Continual improvement is, or should be, an integral part of every food safety management system.

There are many people who seem to enjoy picturing food safety as a journey to a mystical paradise like Shangri-La or a pilgrimage to seek wisdom and enlightenment from the sages living on mountain tops. It is certainly a journey, but it is not mystical. It is a journey that takes hard work; commitment from top management, every day managers, and plant personnel; and an understanding of products and processes so that potential, realistic food safety hazards may be properly identified and controls developed to minimize the potential for their occurrence. In other words, food processors need to adopt the basic HACCP principles; develop a system to verify that prerequisite programs are effective; make sure their managers and workforce understand what it takes to ensure food safety; and develop, document, implement, and maintain the programs required to protect their products, customers, and business.

I am becoming more and more convinced that the plethora of audit schemes, supplier demands, and regulations that vary between states are adding to processor confusion regarding what is and is not required. Operators are further confused when the owners of different audit schemes keep trying to “improve” them by bolting on new requirements on a regular basis. In addition, because some of these add-ons may not be related to food safety, the focus of the audit can be diluted. There is nothing wrong with mandating that a potential vendor not utilize child labor or that a processor prefers to buy from socially conscious operations, but such elements have no place in a food safety audit system.

Those who are less rigorous in their processes can create problems when, instead of focusing on building a rugged food safety management system, they want help in “passing an audit.” This is the wrong attitude—a well-designed and implemented food safety management system will protect products and processes, pass almost any audit that has been developed, and

be flexible enough to meet changing regulatory, industry, and economic demands. What people need to understand is that food safety is mandatory and must be a top priority.

The acceptance of the Global Food Safety Initiative (GFSI) has helped both to standardize food safety and sow confusion. There are currently four audit schemes that have been approved:

- 1) FSSC (Food Safety Systems Certification) 22000
- 2) SQF (Safe Quality Foods)
- 3) IFS (International Food Standard)
- 4) BRC (British Retail Consortium)

Although these schemes are basically the same, since they have met the approval of the GFSI, all are slightly different. In 2009 Jennifer Robinson (then at Horizon Milling) gave a presentation at the AACC International Milling & Baking Technical Conference that clearly demonstrated how similar the GFSI-approved schemes and others really were. If a buyer asks that a supplier adopt a GFSI audit, it should be the prerogative of the supplier to select the audit with which they are most comfortable and that, hopefully, will allow them to manage food safety most effectively. If the supplier demands that one scheme or another be adopted, ask them why and politely inform them that all four have been approved, and whichever scheme is selected it should be acceptable.

One of the issues that has driven how food processors, especially multinational companies, determine which audit scheme to select has been the prescriptive nature of some of these audit schemes. Such schemes define exactly what is expected rather than allowing the processor to implement a program that meets the spirit of specific sections of the audit. My personal belief is that auditors should have the necessary skills and knowledge to look at a program, whether it is a prerequisite program or a HACCP plan, and be able to ascertain whether the program will be effective. Unfortunately, this is a more difficult task and requires greater understanding of the system that is being evaluated, so some audit schemes take the easier route and proscribe what should be done.

Let’s try and define what is specifically required of a food processor when it comes to developing an effective food safety management system. The FSSC 22000 program can be used as a model. FSSC 22000 utilizes the ISO 22000 standard that was issued in 2005 and what was formerly known PAS (Publicly Available Standard) 220, which was issued by the British Standards Institute. PAS 220 is now ISO 22000-1. GFSI felt that ISO 22000 as a standard was not detailed enough to approve as a stand-alone program, hence the evolution of PAS 220. This document defines the expectations for prerequisite programs.

One of the key elements in the PAS 220 document is the following statement, “There are some elements of this document that may not apply to all operations.”

The importance of such language cannot be understated. It provides a processor with an “out” so to speak if there is a program that need not be included in their food safety management system. Of course, if a processor elects to eliminate a program deemed important, they should have a documented risk assessment that highlights the rationale behind their decision.

Once the expectations have been defined, the steps for building the programs required to meet these expectations should be defined. What is needed first and foremost is a strong commitment from management to not only support the development of the food safety management system, but to ensure that it is maintained and updated as needed—the continual improvement element. Management should also ensure that each of the elements that are deemed necessary prerequisites to food safety and the HACCP program are managed by capable personnel. With a small company, one person will most likely end up wearing many hats, and this should be reflected in their job description.

The ISO 22000 standard provides an excellent road map for developing a food safety management system:

- 1) Develop procedures
- 2) Document procedures
- 3) Review and finalize procedures
- 4) Train personnel on all procedures and document training
- 5) Monitor and maintain records that verify procedures are being followed
- 6) Verify procedures are not only being followed, but are effective (this is where the internal audits come in)
- 7) Conduct management reviews to evaluate all elements of the food safety management system on a regular basis
- 8) Use management reviews as a tool for improvement

The two points on the road to building a program that may be new paradigms for processors around the world are internal audits and management review. Processors who may have or are currently using ISO 9001 for quality control will understand the concept of internal audits. These are more than in-house checks, such as the GMP (Good Manufacturing Practices) audit that many companies perform. They should be designed so each element in the food safety management system is evaluated independently. The audit should focus on whether procedures are being followed, records are being kept properly, corrective actions are being performed and closed out, and the persons responsible for doing the work have been trained.

The management review is more than just a meeting of senior management and the big boss. The best way to understand what is expected from the management review is to look at the standard. Management review should be a tool for assessing the food safety management system and evaluating means for continual improvement. Inputs for each review should include records and activities from previous management reviews, analysis of verification activities, descriptions of corrective

action programs, new information that could affect food safety, customer feedback/consumer complaints, internal and external audits, and any other elements that make up the food safety management system.

Ideally, each member of the management team should have conducted an assessment of their programs and activities, analyzed the data, and prepared the information for presentation at the meeting.

Food safety is no mystery, nor should it be a mystical journey. It involves a great deal of hard work and a complete understanding of the processor’s operations, including potential food safety hazards and a program designed to control these hazards. Development, implementation, and maintenance are the responsibility of management. Management must provide the resources and leadership to not only get the program off the ground but to maintain it over time. Failure to maintain a program properly sets the stage for breakdowns and potentially dire consequences. This is why the management review is so important. It is a tool for evaluation and improvement, and without a commitment to improving, processors will certainly begin to fail.

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