

Food Safety and Food Security Program Review

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I. Introduction

Food processors everywhere are revisiting their risk management and food security strategies. In any systematic risk management review, there are five key areas of control:

1. Management of Food Security
2. People
3. Inputs
4. Facilities and Processes
5. Finished Product
6. Crises Management Programs

The following checklist, based on HACCP principles, allows you to evaluate your existing strategy. The detailed requirements for the checklist points have been attached. There are 3 steps in reviewing a Risk Management Strategy:

1. Complete the checklist based on the food processing operation.
2. Create an Action Plan to enhance food safety and food security at the plant.
3. Involve a team of plant management and personnel in implementing this plan and ensure everyone is informed of the measures.

To evaluate food safety and food security at your facility, note that microbiological hazards are the most common food safety concerns. Cross contamination and incomplete management of critical steps are key food safety threats. Cross contamination involves the movement of pathogens and allergens from areas of contamination, such as: raw materials, unsanitary equipment or utensils, unclean air sources and poor hygiene and handling by personnel to processed finished products. This type of contamination can negate all the work that has gone into creating a safe food product.

Incomplete management of critical control points put your customers at risk of foodborne illness. Critical control points such as cooking, sifting, metal detection, pH adjustment and formulation with restricted ingredients help to reduce or eliminate microorganisms and other hazards in your final product. Manufacturers should review these critical points thoroughly throughout the plant and ensure that they are consistently monitored, documented, verified and that corrective action is taken when problems occur.

Non-food chemicals and physical hazards contaminate products both accidentally and intentionally. For instance, unapproved equipment lubricants can be toxic and metal shavings a choking hazard causing consumer illness or even death. As part of the risk management evaluation, list the hazards presented by microbiological, chemical and physical contaminants in the plant. Review how these hazards are controlled within the processing facility and by suppliers. Furthermore, consider allergens a chemical hazard. The vast majority of Canadian recalls are related to cross contamination by allergens.

II. Food Security/Food Safety Checklist

1. Management of Food Security

Knowledgeable people and proactive systems are the cornerstones to an effective risk management strategy.

	Current Status			Action Req d	
	Yes	No	Unsure	Yes	No
1. A qualified individual has been assigned the responsibility for food safety.					
2. Staffs have been trained to be alert to signs of tampering with product or equipment.					
3. There is a process for the investigation of suspicious activity.					
4. Local law enforcement is alerted to all suspected criminal activity.					

2. People

In food plants people can both protect and threaten the product. The following Best Practices will shape an action plan for improving food security and food safety in your operation.

	Current Status			Action Req d	
	Yes	No	Unsure	Yes	No
1. Good Hygiene Practices have recently (in the last 3 months) been reviewed with all new staff and refresher courses provided to long-term staff.					
2. Employees wear uniforms with no pockets above the waist.					
3. Personal items such as lunch containers and bags are kept away from processing areas.					
4. Only designated employees are allowed in sensitive Critical Control Point areas or areas where the product is open to contamination.					
5. Employee identification methods are used to ensure that only authorized personnel are in the plant at all times.					
6. Temporary personnel are only working with packaged, coded and labeled products or in areas that do not directly affect the product.					

3. Inputs

Strict control of all incoming materials is critical to food safety/food security.

	Current Status			Action Req d	
	Yes	No	Unsure	Yes	No
Chemical Control					
1. Cleaning and sanitizing chemicals, lubricants, paints, pesticides and other non-food chemicals are stored away from food processing areas, under controlled access and with documented inventory control.					
2. Material Safety Data Sheets are readily available, up to date and accessible in case of emergency.					
3. Chemicals used in the plant are on the Canadian Food Inspection Agency's Reference Listing of Accepted Construction Materials, Packaging Materials and Non-Food Chemical Products .					
4. Contractors report and control on material usage.					
Ingredient Safety					
1. All incoming raw materials, packaging, processing aids and chemicals are inspected for signs of tampering or other anomalies.					
2. Accept and Reject criteria for all incoming materials are well understood by anyone signing for or receiving products, including courier packages of minor ingredients or laboratory materials.					
3. All deliveries are checked against the orders made by the company.					
4. All incoming materials have clear, legible lot codes for traceability.					
5. New suppliers are thoroughly investigated for their food security programs and the food security programs of existing suppliers are known and acceptable.					
6. Accountability programs such as sign off sheets, exist for all restricted ingredients and highly restricted ingredients are handled by only trained, authorized personnel.					
7. All lot codes for incoming ingredients, processing aids and packaging materials are identified on production records to ensure traceability of all inputs to finished products.					
Water Quality & Safety					
1. The security of well systems have been reviewed and samples taken at several locations within the plant monthly for microbiological checks. A schedule for chemical analysis and analysis for parasites also been established and followed.					
2. Municipally supplied water system procedures have been reviewed and samples taken within the plant at several locations on a regular basis to verify microbiological and chemical safety.					

4. Facilities and Processes:

Factors such as control of unauthorized personnel and management of critical control points must be safeguarded at all times under a properly functioning risk management program.

	Current Status			Action Required	
	Yes	No	Unsure	Yes	No
Controlled Access					
1. A clearly, written visitor policy with Sign-in and Sign-out requirements is in place.					
2. All visitors, especially trades people supply identification.					
3. Visitors are accompanied by plant personnel while in the plant.					
4. Toolboxes and other containers brought into the plant are inspected prior to entry.					
5. Secondary doors, windows and entrances are secured to prevent unauthorized entry.					
Plant Processes					
1. Critical Control Points in the process have been determined and specific acceptable limits identified to control the food safety hazard.					
2. Critical Control Points are managed and monitored by trained, authorized personnel who keep records on their monitoring activities and on any corrective action they have taken.					
3. Someone has been assigned to verify that Critical Control Points are being managed according to the requirements outlined in 1. The person is carrying out verification at least daily, or as determined by the risk management strategy.					
Laboratory Control and Safety					
1. An up to date inventory of all hazardous laboratory chemicals and solvents is kept and such materials are securely locked.					
2. All positive pathogen culture controls are kept locked.					
3. Mercury thermometers are accounted for on a daily basis.					
4. Only sample collection laboratory materials are permitted on the manufacturing floor.					

5: Finished Product

Packaging of in process ingredients and product, storage, transportation and warehousing are critical components to a Food Security Program.

	Current Status			Action Required	
	Yes	No	Unsure	Yes	No
1. Procedures are in place for temporarily resealing ingredients, in-process products and rework in containers, bags, pallets and bins and they are effective.					
2. Individual consumer packages are tamper evident or tamper proof . Palletted product is tamper evident or tamper proof .					

3. Bulk containers that are resealable and not tamper evident are kept in restricted storage areas.
4. Your transportation system or company have a written program for managing food security from pick-up to delivery.
5. Your central warehousing operations and/or your customer's warehousing operations have food security protocols as they relate to Employee Practices, Controlled Access, Chemicals, Facilities and Crisis Management.
6. Waste packaging is controlled and destroyed effectively.

6. Crisis Management:

An effective Recall and Crisis Management Program can decrease the negative impact of a recall or crisis on the facility and help to quickly regain customer confidence.

	Current Status			Action Required	
	Yes	No	Unsure	Yes	No
1. Your organization has a written recall plan with the following key components.					
a. A detailed listing of the recall team, including: names, contact information at home and other likely locations, roles of each of the team members and any pre-developed forms such as media releases or tracking logs that will help facilitate the team carrying out the recall.					
b. A written explanation of the lot coding system that allows forward (to finished products) and backward traceability (to inputs and ingredients).					
c. Steps in the recall process, including when government, customers and media will be notified.					
d. Procedure for conducting a mock recall every six months and how the effectiveness of the mock recall and actual recall will be tracked.					
e. A standard due-diligence contract with all on-site contractors and service providers.					
2. Your plant has a Crisis Management Program with the following key components.					
a. Emergency telephone numbers (e.g. fire, police, ambulance, hospital, and regulatory agencies) made available to key management and plant personnel.					
b. An emergency evacuation plan to get personnel out of the plant quickly and safely.					
c. A plant plan provided in advance to the local fire department or have one in a locked, sealed container outside the plant in the event the plant cannot be accessed.					
d. A strategy for continued production using an alternate company plant or co-packer to avoid prolonged disruption of product flow to customers.					
e. Contacts at a qualified forensic laboratory to help with microbiological, chemical and physical evaluation of unknown materials.					
f. Prepared statements for the press and customers identifying the action that you have taken depending on the situation.					
g. Designate a spokesperson to deal with media calls, and be sure that they are well trained in handling the media.					

- h. Pre-prepared information about the company, especially detailing positive information about food safety, quality, customer recognition and community relations.