

Food Safety Plan Checklist

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Background Information

- Assemble the Food Safety Team – Responsible for planning, developing, and implementing.
 - Select team lead – What qualifications, PC trained?
 - Select people with specific knowledge and expertise about the process and products
 - Operations, QA, Maintenance, Nutritionist, Management
- Description of facility
 - Average Tons produced
 - Integrated/Commercial
 - Species feed or product produced
 - Type of feed (mash, Mineral, Pellet)
- Describe the products, intended use, customers, and distribution.
 - What species is it intended for
 - Customer
 - Is it a Feed or ingredient
 - Is it a meal or pellet
 - Is it sacked or bulk
 - How is it stored or transported
 - Provide Ingredient list (formula)
 - Shelf Life
- Ensure prerequisites are in place
 - Documents Control Procedures should be in place, and documents are accessible to appropriate personnel
 - Based on Current Good Manufacturing Practices (21CFR 507)
 - Personnel, Plant and Grounds, Sanitation, Water Supply and Plumbing, Equipment and utensils, Plant Operations, Holding and Distribution, Holding and Distribution of human food by-products for use as animal food
 - Standard Operating Procedures for processes in the facility (*Best Practice*)
- Develop a process flow diagram of the manufacturing location.
 - Detailed process description to supplement the process flow diagram.
 - Verify that the Flow diagram is correct.
- Develop a list of ingredients used to manufacture feed

Hazard Analysis and Preventive Controls Determination

- Hazard Analysis
 - Go through each step of the process to see if any of the steps consist of possible Biological, Chemical, Physical, and Radiological hazards.
 - Go through each ingredient used and see if they could bring any Biological, Chemical, Physical, and Radiological Hazards,
 - Toxins, pesticides, etc.
- Hazard Evaluation
 - Severity, Probability of hazard, and Method of contamination.
 - Items that must be Considered
 - Formulations, Equipment and facility, Raw materials/ingredients, Transportation practices, Manufacturing/processing procedures, Packaging and labeling activities, Storage and distribution, Intended or reasonably foreseeable use, Sanitation, Other factors, such as Temporal (weather-related) nature of hazards

Preventive Controls and their Management Components ***required, when appropriate, if hazard analysis identifies a hazard requiring a preventive control*

- Develop Preventive Controls
 - Any further procedures that may need to be in place to eliminate a hazard found.
 - Process Control
 - Utilize procedures, practices, and processes to either significantly minimize or prevent a hazard
 - Facility establish specific parameters that must be met
 - Provide for evidence-based protection
 - Sanitation
 - Cleanliness of animal food contact surfaces
 - Prevention of cross-contamination
 - From insanitary objects/personnel (shovels, scoops, openings, etc.)
 - From Raw product to processed product
 - Supply-Chain
 - Supply-Chain-Applied Control (written program)
 - Approving suppliers
 - Using only approved suppliers
 - Determining, conducting, and documenting appropriate supplier verification activities
 - Implementing appropriate preventive control management components
 - Documentation
 - Other
- Define the critical limits
 - Use research or history to find what the acceptable limits are

- Monitoring
 - Develop records and written procedures to monitor any preventative controls
 - To conduct a planned sequence of observation or measurements to assess whether control measures are operating as intended
 - Examples: Temperature, Time, Weight, Flow rate, Appearance, and pH
- Develop Corrective action and Corrections process
 - How are you going to correct if the issues that go outside of the Critical limits?
 - Establish and implement written corrective action procedures that must be taken if preventive controls are properly implemented
 - Take appropriate action is taken to identify or correct a problem that occurred during implementation
 - Take appropriate action is taken to reduce likelihood of reoccurrence
 - Evaluated affected animal food for safety
 - All affected animal food is prevented from entering into commerce if safety cannot be ensured
 - Reanalyze the food safety plan when needed
- Verification
 - Validation that the preventive controls are working
 - Done whenever a change to control measure or combination of a control measures that could affect the control of the hazard
 - Done whenever a reanalysis of the food safety plan reveals the need to do so
 - Prior to implementation, 90 calendar days, within a reasonable timeframe with written justification
 - Must include scientific and technical evidence to determine whether controls will effectively control the hazards
 - Not needed on sanitation controls, recall plan, supply-chain program, others with written justification
 - Verification that Monitoring is being conducted
 - Verification that Appropriate Decisions about Corrective Actions are being made
 - Verification of Implementation and Effectiveness -
 - Product testing
 - Environmental monitoring
 - Calibration/monitoring of thermometers, meters, and scales
- Recall Plan ****Best practice even if not required*
 - Notify the direct consignees of animal food being recalled, How to return or dispose
 - Notify the public about hazards if presents danger to human and animal health
 - Conduct effectiveness checks to verify the recall is carried out
 - How to dispose of the recalled food (if reprocessing, reworking, destroying)
 - Common Elements
 - Defined roles and responsibilities
 - Contact lists for external notifications (Regulators, customers, public)

Implementation Records

- Reanalysis of the Food Safety Plan
 - Every 3 years or when a corrective action, process change, ingredient change, product change, or more information proves needed sooner
- Recordkeeping
 - Records must be retained for at least two years
 - Records must:
 - Be kept original or electronic records
 - Contains actual values or observation
 - Be accurate, indelible, and legible
 - Being created concurrently with performance of the activity documented
 - Be as detailed as necessary to provide history of work performed
 - All Record must include:
 - Information adequate to identify the plant or facility (name and address)
 - The date and, When appropriate, the time of the activity documented
 - Signature or initials of the person performing the activity
 - Where appropriate, the identity of the product and lot code, if any
- Personnel Training
 - Annual Trainings
 - Can be sign in sheets, Signatures on SOPs or Quizzes
 - Principles of animal food hygiene and animal food safety for those involved in processes.
 - Training check-list for new employees, includes description of on the job training activities.