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
  o Go through each step of the process to see if any of the steps consist of possible Biological, Chemical, Physical, and Radiological hazards.
  o Go through each ingredient used and see if they could bring any Biological, Chemical, Physical, and Radiological Hazards,
    ▪ Toxins, pesticides, etc.

☐ Hazard Evaluation
  o Severity, Probability of hazard, and Method of contamination.
  o 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
  o 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
        o From insanitary objects/personnel (shovels, scoops, openings, etc.)
        o From Raw product to processed product
    ▪ Supply-Chain
      • Supply-Chain-Applied Control (written program)
        o Approving suppliers
        o Using only approved suppliers
        o Determining, conducting, and documenting appropriate supplier verification activities
        o Implementing appropriate preventive control management components
        o Documentation
    ▪ Other

☐ Define the critical limits
  o 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
  o Every 3 years or when a corrective action, process change, ingredient change, product change, or more information proves needed sooner

☐ Recordkeeping
  o Records must be retained for at least two years
  o 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
  o 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
  o Annual Trainings
  o Can be sign in sheets, Signatures on SOPs or Quizzes
  o Principles of animal food hygiene and animal food safety for those involved in processes.
  o Training check-list for new employees, includes description of on the job training activities.