Working with the Food Safety Program

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WSDA Mission Statement

“To support the viability and vitality of agriculture while protecting consumers, public health and the environment.”
Overview

- Food Processor License Requirements
- Regulations
- Very Small Processor requirements
- Food Safety Modernization Act (FSMA) - Preventive Controls approach for food safety
Food Safety Program

- Licenses food processing for **wholesale**
- Does not regulate the growing of food products – land or sea based
- Processors must ensure ingredients are from a safe source
- Prevent or significantly reduce hazards in finished product
When is a Food Processing License required?

Definition of Food Processing –

“Means manufacturing, processing, packing, canning, bottling, or any other production, preparation, or putting up.”

Minimal harvest related activities are not food processing – harvesting and preparing lettuce for sale at a farmer’s market as an example.
Food Processor License Requirements

- **Facility Requirements** – construction, hand wash sinks, employee restrooms
- **Process Water**
- **Process and packaging does not introduce new hazards** – pathogens, allergens
- **Labeling meets Federal requirements**
- **Under FSMA** all firms are responsible for identifying and controlling hazards reasonability likely to occur.
All processors must identify and control food safety hazards:

- Biological – bacteria, viruses, etc.
- Chemical – environmental toxins, allergens
- Physical – plastic, rubber, metal
Regulatory Overview for Food Processors - FSMA

Good Manufacturing Practices, Hazard Analysis and Risk Based Preventive Controls for Human Food Rule – 21 CFR 117

- **Subpart A - General Requirements**
- **Subpart B - Good Manufacturing Practices**
- Subpart C - Hazard Analysis and Preventive Controls
- Subpart D - Modified Requirements
- Subpart E - Withdrawal of Qualified Facility Exemption
- **Subpart F - Record Requirements**
- Subpart G - Supply Chain Program
Food Safety Plan Components

- Hazard Analysis
- Preventive Controls
- Supply-Chain Program If Needed
- Monitoring Procedures
- Corrective Action Procedures
- Verification Procedures
- Recall Plan
- Records
• One size does not fit all

• Plan needs to address hazards including:
  • Ingredients
  • Process Steps
  • Finished Product
“Very small business”

Including subsidiaries and affiliates averaging less than $1,000,000 per year in sales of human food.
Very Small Business

• EXEMPT from having a written Food Safety Plan
  IF: Qualified Facility Attestation filed with FDA

• Small Business are subject to:
  • GMP requirements
  • Qualified Individual Training Requirements
  • Identifying and controlling all food safety hazards

• If a firm does NOT submit Attestation
  • Subject to full Food Safety Plan requirements
For a Qualified Facility Processing Seaweed

From 21 CFR 117:

• Subpart A - Employee Training – sanitation and hygiene
• Subpart B - Good Manufacturing Practices
• Subpart F - Employee Training Records
Thank you!
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