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|  | <h1>Policies and Procedures</h1> | Document No.: FSPCA-Food Safety Plan Teaching Examples WG | Version No.: 1.0 |
| | | Point of Contact: David Gombas | Page 1 of 3 |
| Title: FSPCA Guidelines for Industry-specific Food Safety Plan Teaching Examples for FSPCA Human Food Training | | SC voted date: 10/12/2016 Effective date: 10/12/2016 Revised date: 11/30/2016 | Suggested distribution: |

1.0 Title

Guidelines for Industry-specific Food Safety Plan Teaching Examples for FSPCA Human Food Training

2.0 Relevant FSPCA Committee/Subcommittee

Food Safety Plan Teaching Examples Work Group

3.0 Food Safety Plan Teaching Examples must:

- Be realistic for the identified product. There may be multiple ways to manufacture/process the product, but this food safety plan teaching example must describe one that is realistic. Likewise, the teaching example should not attempt to be “generic”; it should be appropriate for the process described in the teaching example.
- Be as complete as necessary to provide for a realistic example of a food safety plan, recognizing that the teaching example will likely not be complete (e.g., may not include all supporting SOPs and documents). While the size of the teaching example will be industry-specific and there is no maximum limit, the teaching example must also not be so long as to be impractical as a training tool (e.g., too many steps in the flow diagram).
- Use the FSPCA Food Safety Plan Teaching Example format. While not required by the regulation, a standardized format avoids the format from being a distraction to the course participants.
- Include the FSPCA “for training purposes only” disclaimer on the front page and a disclaimer including the words “FSPCA training model” in the footer of each page.
- Include a Table of Contents.
- Include all of the “preliminary steps”: company description, product description (i.e., product name(s); product description, including important food safety characteristics; ingredients; allergens; packaging used; intended consumers; intended use; shelf life; labeling instructions; and storage and distribution), flow diagram, and process narrative. While none of these are required by the regulation, they are recommended in the FSPCA training materials and are necessary for the in-class exercises, to provide sufficient information with which to perform the hazard analysis. See PC Course Instructor Guide, Chapter 6, for information recommended to be included.
- Be consistent in the description of steps in the flow diagram, process description narrative and hazard analysis. While not required by the regulation, this prevents inconsistent descriptions from being a distraction to the course participants.



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- Have at least one preventive control. While having examples of all four types of preventive controls is ideal, this may not be realistic or practical for all types of operations.

4.0 Options:

- The preliminary steps may include additional information, e.g., plant layout, if useful to understanding the food safety plan teaching example.
- The food safety plan teaching example may include “other” preventive controls as practical and realistic (e.g., temperature control during transportation).
- The hazard analysis table may include “brainstorming” in column 2, or just the final summary of hazards warranting consideration in column 3. If a hazard is listed in column 2, it must be addressed in columns 3 and 4. A listing of “None” in column 2 is valid either way and may be, but is not required to be, explained in column 4.
- When foundational programs (e.g., a GMP) support a decision that a hazard does not require a preventive control, a specific GMP may be identified in column 4 as a justification (e.g., Metal from equipment is not reasonably likely to occur because of Preventive Maintenance SOP# xxx).

5.0 Prohibited:

- Anything not compliant with the PCHF rule, e.g., examples should not indicate a procedure is done because it is required by the rule unless the relevant provision in the rule says “must.”
- Food safety plan teaching examples cannot be labeled as copyrighted or not for distribution, as the intent is for these to be shared and used by Lead Instructors in training, as appropriate.

6.0 Review prior to official use:

- Neither FSPCA nor FDA review/acceptance is required for use in a PCQI course, but is encouraged to avoid inconsistencies with the PCHF rule and other aspects of FSPCA training.
- Submitter is responsible for ensuring the food safety plan teaching example is as complete and compliant with the above format/component requirements as possible, before submitting to designated FSPCA staff member.
- Designated FSPCA staff member performs preliminary review for format/component compliance with these guidelines. Non-compliant teaching examples are returned to submitter with comments. Designated FSPCA staff member submits



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format/component compliant teaching examples to the FDA Point of Contact, who will forward to appropriate FDA subject matter expert (SME) for preliminary review.

- FDA SME reviews the food safety plan teaching example for compliance with the PCHF rule. FDA official returns the teaching example to the FDA Point of Contact, who forwards to designated FSPCA staff member with comments or “no objection”.
- Designated FSPCA staff member returns the teaching example with any comments to submitter as conditionally acceptable or not acceptable.
- Teaching examples that are not acceptable must be revised and resubmitted to designated FSPCA staff member for re-review as above.
- Conditionally acceptable teaching examples must be vetted with the target audience, ideally in a minimum of three PCQI courses, to minimize technical inaccuracies, ensure usefulness as a teaching example and make any industry-desired changes.
- Courses may be led by the submitter (if an FSPCA Lead Instructor) or others familiar with the intended use of the teaching example. Caution should be used in making changes, to avoid changes that may be inconsistent with these guidelines or the PCHF rule.
- Vetted teaching examples are submitted to designated FSPCA staff member for final review.
- Designated FSPCA staff member performs a final review of the teaching example for format/component compliance with these guidelines and any comments that were provided to the submitter in the conditional review. If substantive changes have been made (e.g., hazard or control step added or removed, or change in decision of a hazard requiring preventive control), the teaching example should also be reviewed by FDA. Food safety plan teaching examples that are not compliant with these guidelines or are inconsistent with the PCHF rule based on FDA review are returned to the submitter.
- Food safety plan teaching examples for which there are no objections are posted to the FSPCA Instructor Portal and Lead Instructors are notified of their availability.
- Translations of approved food safety plan teaching examples must be performed through the FSPCA International Subcommittee.