What’s New in the FSPCA Human and Animal Food Curricula

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Update of FSPCA Preventive Controls for Human Foods
Goals for Updated Version

• Address new regulatory guidance including the FDA Hazards Draft Guidance
• Reflect updated information, update references, e.g., RFR, CDC
• Streamline sections, reduce redundancy
• Support development of key concepts
• Increase small- and mid-sized producer applications
• Gain recognition as an approved HACCP-based curriculum
Recognition as HACCP-based Curriculum

The course materials will:

• State this is a HACCP-based curriculum

• Show the development of PCHF from the traditional HACCP model

• Cover the 7 principles of HACCP focusing on CCPs / Process Preventive Controls in consecutive order (plus the preliminary steps which constitute the 12 steps of HACCP)

• Include instructor notes that help the instructors address facilities that have HACCP plans already in place
PCHF Chapter Overview

- Preface – The Preventive Controls for Human Foods Course
- Chapter 1 – Introduction to Preventive Controls and the Food Safety Plan
- Chapter 2 – Good Manufacturing Practices and Other Prerequisite Programs
- Chapter 3 – Biological Food Safety Hazards
- Chapter 4 – Physical and Economically Motivated Food Safety Hazards
- Chapter 5 - Preliminary Steps for Plan Development and Resources
- Chapter 6 – Hazard Analysis
- Chapter 7 – Preventive Controls Overview
- Chapter 8 – Process Preventive Controls / Critical Control Points
- Chapter 9 – Process Preventive Controls – Critical Limits, Monitoring and Corrective Action
- Chapter 10 – Process Preventive Controls – Verification and Monitoring
- Chapter 11 – Food Allergen Preventive Controls
- Chapter 12 – Sanitation Preventive Controls
- Chapter 13 – Supply Chain Preventive Controls
- Chapter 14 – Food Safety Plan Management, Verification and Training
- Chapter 15 – Recall Plan
- Chapter 16 – Regulation Overview / FDA Regulatory Oversight
Preface and Chapter 1

- Combines Chapters 1 and 2 of previous version
- Introduces the Food Safety Plan
- Connect PCHF to HACCP
- Streamlined to reduce redundancy
- Moves course management information to the Preface
Chapter on GMPS

Chapter 2 – Good Manufacturing Practices and Other Prerequisite Programs

• First, GMPs from 21 CFR 117 Part B are listed

• Then, the policies and procedures used by food operations to implement GMPs and other pre-requisite programs are covered

• Instructors are encouraged to emphasize elements that are most appropriate for the audience
Chapters on Hazards and Preventive Controls

Chapter 5 – Hazard Analysis
• Combines elements of previous Chapter 7 (resources)
• Clarifies distinction between hazard identification and evaluation
• Incorporates potential hazard info from the FDA Hazards Guidance

Chapter 6 – Determination of Preventive Controls
• This was split out from the previous Hazard Analysis chapter (8) to make covering this chapter more manageable
• Introduces the types of Preventive Controls
• Covers Preventive Controls exemptions
Process Preventive Controls

Chapters 8, 9 and 10

• Process Preventive Controls was broken up to provide more clarity and attention to each of the HACCP-based principles

Ch 8 – Process Preventive Controls, Critical Limits, and Operating Limits

• Operating Limits was moved to follow Critical Limits

Ch 9 – Monitoring and Corrective Action

• Added examples for both monitoring and corrective action

Ch 10 – Verification and Record Keeping

• These elements are introduced and here, they focus on CCPs
Chapters 11, 12, and 13

- Allergen, Sanitation, and Supply Chain Preventive Controls
  - With verification and record keeping introduced in Chapter 10, these sections will cover all management components (parameters, corrective action, verification, and record keeping)
  - Improved focus on control using GMPs vs Preventive Controls
  - Better delineation between Supplier Approval and Supplier Verification activities
Chapter 14

• Program management and long-term verification
  – Plan management and training will be address in this Chapter
  – Long term verification will be discussed with requirements for overall plan review
Recall & Regulation/Regulatory Oversight Chapters

Chapter 15 and 16

• Recall and Regulatory Chapters
  – Recall Chapter streamlined to focus on regulatory requirement
  – Regulatory Chapter streamlined to provide overview of Regulation and introduce information on FDA regulatory oversight (what to expect)
What’s Next?

Development
• Review of Appendices including E.G. Food Company
• Review of applicable chapter exercises
• Addition of knowledge checks at the end of each chapter
• Addition of new food safety plan teaching examples

Reviews
• Walk-through
• Pilots
• FDA Review
FSPCA Preventive Controls for Animal Foods