Starting on the Right Track -

Food Health & Safety Regulations 101
Pay Attention to Food Safety-
(You really do not want to kill anyone...)
The Culture of Food Safety

The customer expects the food to be safe
(so does the regulatory agency)

OF COURSE MY PRODUCT IS SAFE—I CARE ABOUT MY CUSTOMERS..MY CUSTOMERS KNOW ME AND MY FAMILY
Words words words – when food safety demands behaviors like these...

- Taking responsibility for the safety of your products
- Second, searching out and incorporating knowledge
- Communicating internally and externally about food safety
- Developing a mindset of continual improvement in food safety
“If you listen to the major companies who have had significant, national food safety crises in the last 20 years and survived them, they all talk about how they have since made food safety an integral part of their everyday business culture. You may remember the Jack in the Box *E. coli* crisis in 1993 where four people died and several were hospitalized. After suffering through some dark years, the company emerged in no small part because they embraced food safety, made it part of their business culture and then communicated what they were doing internally to their employees, externally to the suppliers and finally to their customers. “
Take Responsibility

- “I am too small”
- I do not plan to hurt anyone.
- Food safety costs too much—farmer’s should not be burdened with it—times are tough
- Local is safer
- I am not using any additives or preservatives or chemicals
- No one has ever gotten sick from my products
- It won’t happen to me
Take Responsibility

- Food safety is just one cost of doing business
  - No different than an important piece of equipment or a marketing program
  - Your costs will vary based on your size, your product, your processing facility, etc.
  - You will pay the piper one way or the other
Take Responsibility

- You are a food processor. You are processing food for your customers—not your family.
- When you walk in the door of your facility (farm kitchen, commercial kitchen or processing plant), take off your farmer’s hat and put on your processing hat.
Knowledge is Power: Your Product and Process

- Search out and incorporate food safety knowledge into your business plan

- You will need to:
  - know your product;
  - then know who regulates your product and what the regulations are that apply to your product;
  - know what you will need to do to meet regulatory requirements, write and carry out a food safety plan, and ultimately to produce a product that will be as safe as it can be for the consuming public.
Knowledge is Power: Your Product and Process

- Know your product and your intended process.
  - What are you going to make?
  - What are the ingredients?
  - Where are the ingredients going to come from?
  - Who is your target consumer?
  - How will this product be prepared, processed, packaged, distributed, labeled?
Do you know the food safety risks inherent in your product? Your recipe? Or your process?

You need to know what you do not know. And take the time and expend the resources necessary so that you do know.
US Department of Agriculture (USDA), Food Safety Inspection Service (FSIS)  
- **Albany District Office**  
  - Responsible for ensuring that the nation's commercial supply of meat, poultry, and egg products is safe, wholesome, and correctly labeled and packaged, as required by the Federal Meat Inspection Act, the Poultry Products Inspection Act, and the Egg Products Inspection Act.  
  - FSIS requires all M&P plants to have a HACCP plan—though there are exemptions for custom slaughter and small poultry operations  
  - Connecticut state agencies do not regulate the slaughter or processing of meat or poultry and Connecticut does not allow meat and poultry products to be sold to retailers (restaurants, grocery stores, foodservice, etc.) unless the products have been processed under USDA/FSIS inspection.
Knowledge is Power: The Regulators and the Regulations

- **U.S. Food and Drug Administration (FDA)**
  - The FDA is responsible for assuring that foods sold in the United States are safe, wholesome and properly labeled.
  - This applies to foods produced domestically, as well as foods from foreign countries.
  - The Federal Food, Drug, and Cosmetic Act (FD&C Act) and the Fair Packaging and Labeling Act are the Federal laws governing food products under FDA's jurisdiction, which includes all foods not covered by USDA/FSIS.
Knowledge is Power: The Regulators and the Regulations

- FDA, in partnership with the Conference for Food Protection develops the federal Model Food Code.

- Current Good Manufacturing Practices (CGMPs or GMPs) for food (21 CFR Part 110)

- Acidified and low acid canned food regulations, including establishment registration and process filing.

- Hazard Analysis Critical Control Point (HACCP) programs for seafood, fresh juice (including cider) and other products.
Intrastate VS Interstate Jurisdiction

- The Juice HACCP regulation applies to both interstate and intra state distribution (the Seafood HACCP reg does not)
- Any business qualifying as a “food facility” must register with FDA, even if that business only engages in intrastate commerce.
- In addition, the agency can inspect the records of a business if there is a “reasonable belief that an article of food is adulterated and presents a threat of serious adverse health consequences or death to humans or animals.”
Regulate food businesses that include
- Bakery,
- Non-alcoholic Beverage/Cider,
- wholesale and retail frozen desserts and
- food vending machine (all of which require licenses)
CT Department of Consumer Protection regulates “food establishments in Connecticut. A “Food Establishment" means any establishment in which food is stored, offered for sale, processed, or prepared, **other than an eating or drinking establishment**, and includes the transportation of any food.

The Foods Program is responsible for inspecting retail and wholesale food manufacturers that operate, transport or store food in Connecticut.
DCP also conducts food manufacturing inspections under the United States Food & Drug Administration (FDA) contracts (ie., seafood, cider, cheese).
Regulations that relate to DCP

- CHAPTER 417*
  GENERAL PROVISIONS. PURE FOOD AND DRUGS

- CHAPTER 418*
  UNIFORM FOOD, DRUG AND COSMETIC ACT
  This includes (21a-101) the Sanitary Standards for Food Establishments. All food businesses as defined above must comply with these. These standards are similar to federal GMPs/SSOPs.

- If a commercial kitchen is licensed by the CT Department of Health, this does not mean that the facility can automatically be used as a food Processing facility. You must contact the DCP if you are considering processing a product.
CT Department of Public Health
Food Protection Program:
- Mission is to reduce the risk of foodborne disease by ensuring reasonable protection from contaminated food and improving the sanitary condition of foodservice establishments.
- This is accomplished by:
  - enforcement of regulations,
  - training and education,
  - technical consultation,
  - Investigation of foodborne disease outbreaks, and
  - food safety promotion.
State and Local Health Departments

- The Food Protection Program works with local health departments responsible for inspecting restaurants, institutional food service, school foodservice, temporary food events, and related venues.

- It is the local health district/department for your town, city or region that carries out the mission of the Food Protection Program locally. You need to know who your local inspector is and develop a respectful relationship right from the start. You can learn from them. They can learn from you.
Put Knowledge to Work: A Food Safety Plan

- From the time you start writing your business plan, you should be thinking about food safety
- Have a good foundation that includes plan review, Good Manufacturing Practices and Sanitation Standard Operating Procedures
GMPs are Good Manufacturing Practices
Found in 21 CFR, Part 110.
They address:
- General maintenance of physical facilities;
- Cleaning and sanitizing of equipment and utensils;
- Storage and handling of clean equipment and utensils;
- Pest control;
- Proper use and storage of cleaning compounds, sanitizers, and pesticides;
- Employee training; and
- Plant design.
**Put Knowledge to Work: A Food Safety Plan**

- **Standard Operating Procedures — SSOPs**
  - The specific, written procedures necessary to ensure sanitary conditions in the food plant. They include written steps for cleaning and sanitizing to prevent product adulteration.
    - What does clean mean?
    - What does sanitized mean?
    - What is the right proportion of chlorine bleach to water to make an effective sanitizer.
    - When does it make sense to use a different sanitizer?
Eight sanitation areas that should be addressed in an SSOP plan:

- **Safety of the water** that comes into contact with food or food contact surfaces
- **Condition and cleanliness of food contact surfaces**, including utensils, gloves, and outer garments.
- **Prevention of cross-contamination from insanitary objects** to food, food packaging materials, and other food contact surfaces, including utensils, gloves, and other outer garments, and from raw product to cooked product;
- **Maintenance of hand washing and sanitizing, and toilet facilities**;
- **Protection of food**, food packaging materials, and food contact surfaces from adulteration with lubricants, fuel, pesticides, cleaning compounds, sanitizing agents, condensate, and other chemical, physical, and biological contaminants;
- **Proper labeling, storage, and use of toxic compounds**;
- **Control of employee health conditions** that could result in the microbiological contamination of food, food packaging materials, and food contact surfaces; and
- **Exclusion of pests** from the food plant.
Put Knowledge to Work: A Food Safety Plan

- HACCP (Hazard Analysis Critical Control Point)
  - Even if you are not required (by regulation or by customer) to have a HACCP Plan, do the first steps anyway.
- Do a Hazard Analysis.
  - Look at each step in your process (receiving, refrigerating, preparation, storage, etc.) and figure out what food safety hazards there might be at each step.
- Food safety hazards are the biological, chemical, and physical entities that might cause a foodborne illness, injury or incident.
Focus on these Critical Food Safety Control Points,
Set standards or limits for these points, and
Monitor the Critical Points for problems,
Correct the problems,
Keep records about what is happening at these critical points and finally
Verify and validate that your plan is working
Put Knowledge to Work: A Food Safety Plan

- What about Good Agricultural Practices or GAP??
- Are you making a product from fresh produce that will not be cooked??
Continuous Improvement

- Now that you know everything, train your staff.
- Just when you think everything is all up to date, you know all there is to know. Things will change. It is your responsibility to know that.
- Resources—see information on thumb drive