

# Food Safety for Smaller Operations: wearing all the food safety hats at once.

Rebecca Guzy – Director of Research, Frick's Quality Meats

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# My background, why this subject is relevant.

- First half of my career: large suppliers to the food industry or large CPGs.
- Second half of my career: small family owned business.
- Reality:
  - I no longer had all the corporate resources at my fingertips.
  - I had a lot to learn and no roadmap.
  - My team expected me to know it all because I came from a Big Company.
- Humbling to realize how little I really knew.

Franklin D. Roosevelt said,  
“Great power involves great responsibility.”

Spider Man also said,  
“With great power comes great responsibility.”

While we may not always feel we have great power,  
it can be said of the Food Safety Professional,  
with great expectations comes great responsibility.

All companies I have worked in have great expectations  
of their Food Safety Professionals,  
organizations may or may not realize the great  
responsibilities on our shoulders.

# Food Safety Professionals in smaller companies – all knowing?

As a food safety professional you may:

- Be the only scientist on staff.
- Have the broadest role encompassing many disciplines.
- Be looked to for answers on many broad subjects.
- Be expected to be the calm in the storm.
- Often be the bearer of bad news and need be expected to bring solutions.

This is especially true of family owned smaller businesses, start-up and business that are younger in their business maturity (regardless of how many years they have been in operation).

# Benefits of Smaller Companies

- Better pulse of the business.
- Quick decision making.
- Food Safety has even more of a seat at the table.
- Direct impact to the bottom line. Key player.
- Never boring, never the same day twice.

# Challenges

- Critical decision making falls to a few
  - Must be a data driven decision making champion.
  - Broad shoulders and firm conviction requires.
- Limited resources and technical knowledge
  - People and funds
- Culture, processes, procedures and people may not have grown up with the company and can be behind.

# Today's three learning objectives:

1. Knowing what you don't know.
2. Filling in the gaps.
3. Upping your food safety game.

# Business Maturity and Food Safety Culture

- Business Maturity vs. Age of Company more greatly affect Food Safety Culture and the challenges you may encounter.
- Food Safety Professionals wearing all the Food Safety hats are common in businesses that have a relatively small number of employees, < 300, and have demonstrated business success
- May be anywhere in the business maturity continuum.  
Infant → Awkward Teenager → Mature Adult



A

I don't know what I  
don't know

B

I don't know what I  
know

D

I know what I know

C

I know what I don't  
know

Learning Objective 1:

**HOW DO YOU KNOW WHAT YOU DON'T  
KNOW?**

# Knowing what you don't know...

## HARPC/HACCP

### Foundational Pre-requisite programs

- Good Manufacturing Practices
- Traceability and Recall
- Sanitation Standard Operating Procedures (SSOPs)
- Pest Control
- Preventative Maintenance
- Environmental Monitoring
- Supplier Approval and Verification
- Allergen Control Program

### Additional must have's

- Process Validation
- Microbiological Support
- Shelf Life Validation

GFSI Auditing Schemes are great templates to shamelessly steal from!

# Knowing what you don't know... where to find the basics.

- HARPC/HACCP
  - Both FDA and USDA give good guidance. Many free resources out there to get you started. Most will also sell you software to set up programs.
  - <https://www.fda.gov/food/hazard-analysis-critical-control-point-haccp/haccp-principles-application-guidelines>
  - [https://www.fsis.usda.gov/sites/default/files/media\\_file/2021-03/Guidebook-for-the-Preparation-of-HACCP-Plans.pdf](https://www.fsis.usda.gov/sites/default/files/media_file/2021-03/Guidebook-for-the-Preparation-of-HACCP-Plans.pdf)
  - <https://www.harpc.com/>
- Traceability/Recall
  - There are many software companies with pre-packaged programs to guide your company through this process.
  - University extension programs provide guidance and training.
  - <https://extension.uga.edu/publications/detail.html?number=B1509>
  - Food industry publications can also be a good source of best practices.
  - <https://www.foodengineeringmag.com/articles/98026-how-food-processors-can-create-a-plan-for-traceability-and-recalls>
  - The Institute of Food Safety and Health has a useful Recall Plan template.
  - <https://www.ifsh.iit.edu/sites/ifsh/files/departments/fspca/pdfs/recall-plan-template-09-01-16.docx>

# Knowing what you don't know... where to find the basics, continued.

- GMPs
  - University Extension programs have good free guidance and courses available.
  - <https://cals.cornell.edu/dairy-extension/what-we-do/food-safety-resources/good-manufacturing-practices>
- Sanitation SSOPs
  - Many free templates available from university extension and also regulatory agencies.
  - <https://extension.psu.edu/writing-sanitation-standard-operating-procedures-ssops>
  - [https://www.fsis.usda.gov/sites/default/files/media\\_file/2021-03/Sanitation-SOP-Guide.pdf](https://www.fsis.usda.gov/sites/default/files/media_file/2021-03/Sanitation-SOP-Guide.pdf)
  - <https://log10.com/sop-for-food-processing-industry/>

# Knowing what you don't know... where to find the basics, continued.

- Allergen Control Plan
  - Helpful articles in both Food Safety Magazine and Quality Assurance Magazine as well companies with both free resources and systems that can be purchased.
  - <https://www.food-safety.com/articles/6738-writing-and-implementing-an-allergen-control-plan>
  - <https://www.qualityassurancemag.com/article/vetting-your-allergen-control-plan/>
  - <https://www.neogen.com/neocenter/blog/allergen-control-plans-in-the-food-industry-best-practices/>
  - <https://www.fooddocs.com/post/haccp-allergen-control-program>

# Knowing what you don't know... where to find the basics, continued.

- Environmental Monitoring
  - International Food Safety & Quality Network, helpful of videos.
    - How to Set up a Sampling Zone for an Environmental Monitoring Program  
<https://www.youtube.com/watch?v=S8xuUD5roQo>
    - Tips for an Effective Environmental Monitoring Program.  
[https://www.youtube.com/watch?v=rVhc3gSZ\\_uA](https://www.youtube.com/watch?v=rVhc3gSZ_uA)
- Supplier Approval and Verification
  - A starting point is the regulatory guidance:
    - <https://www.fda.gov/media/108732/download>
  - Like traceability and recall, many companies offering tools in this area. Several represented here at the Food Safety Summit.
  - Food Safety Magazine resources.
    - <https://www.food-safety.com/articles/4512-ten-considerations-for-developing-a-fsma-compliant-supplier-verification-program>

# Knowing what you don't know... where to find the basics, continued.

- Pest Control (IPM - integrated pest management)
  - GFSI auditing scheme for expectations. Utilize your contracted pest control company resources.
  - <https://www.food-safety.com/articles/6996-integrated-pest-management-in-food-manufacturing-facilities>
- Preventative Maintenance
  - Good searchable resources on the web.
  - <https://www.food-safety.com/articles/3788-preventive-maintenance-an-essential-prerequisite-for-food-safety>
  - <http://justfooderp.com/blog/seven-preventive-maintenance-best-practices-for-food-manufacturing/>

Learning Objective 2:

**FILLING IN THE GAPS.**

# Resource Gaps

- Expertise to cultivate or experts to have in your contacts:
  - Microbiology
  - Basic Science of Food
  - Thermal Processing
  - Sanitation
  - Regulatory Compliance
  - Statistics
  - Product Inspection Resources
  - Recall Firms

# Resources

- Laboratories
  - Analytical laboratories
  - Microbiological laboratories (acceptable labs may be specified by your regulators)
  - Make sure they are accredited and you have copies of their accreditation.
- University Subject Matter Experts
  - Develop a network of experts that you can reach out to when needed. Food Chemistry, Food Microbiology, Agricultural Statisticians, Quality Assurance.
- Trade Associations
  - IFT and NAMI provide great training and resources to members.
    - Technical Support, Sanitary Design Assistance, Legal Guidance, Crisis Management Team, etc.

# Resources, continued...

- Processing Authorities
  - There will be instances where your data and processes must be evaluated/interpreted by a Subject Matter Expert or Processing Authority.
  - Necessary for thermal process validations, challenge studies, assistance with HACCP deviations, dealing with regulatory agencies.
  - Develop these relationships before you need them for a deviation or crisis.
  - Often your analytical laboratory, food safety ingredient supplier or University connections can recommend a Processing Authority.
- Certified Sanitarians
  - Consulting firms that specialize in sanitation. A web search on food sanitation consulting will give options.
  - Can provide assistance in overall sanitation process, sanitation chemicals, sanitary design of equipment, seek and destroy methodology, etc.

# Resources, continued...

- Regulatory Compliance
  - FDA and USDA's FSIS offer course from time to time in regulatory compliance.
  - Cornell University, Michigan State University, and The Ohio State University all offer short courses in food regulatory compliance.
- Certified Sanitarians
  - Consulting firms that specialize in sanitation. A web search on food sanitation consulting will give options.
  - Can provide assistance in overall sanitation process, sanitation chemicals, sanitary design of equipment, seek and destroy methodology, etc.

# Resources, continued...

- Foreign Material Inspection Services
  - Several companies exist that specialize in finished product inspection of individual packages and cases for a variety of contaminants.
- Recall Assistance
  - Even if you have all the programs in place, you may want additional support if you find yourself in a recall situation.
  - Trade Associations can assist with crisis management, technical subject matter experts and assist with public relations.
  - Several companies available that can also: serve as a member of your crisis team, help you communicate with regulators, serve as technical experts and help with public relations.
  - As with all resources, it is best to cultivate your relationships and contact list ahead of a situation.

Learning Objective 3:

**UPPING YOUR FOOD SAFETY GAME.**

# Upping your Food Safety Game

Food Safety is always evolving.

Threats to the consumer, customer, business and brand come in many different forms.

Current examples: pandemic, supply chain disruption and climate change

How to keep updated on new and emerging issues?

Short and sweet:

- Be curious
  - Read/Subscribe to blogs and USDA or FDA announcements and directives.
  - Monitor the Bill Marler's posts.
  - Strive to be a Subject Matter Expert in at least one discipline.
- Network
  - Surround yourself with great resources.
  - Give back to Food Safety.
    - Publish Food Safety information internally to your company or participate externally in forums and conferences.
    - Keep your Sr. Management updated on new/emerging issues.
- Have a “never arrived” mentality

# Thank you.

Questions/Follow-Ups:

Rebecca Guzy

Director of Research, Frick's Quality Meats

[rguzy@frickmeats.com](mailto:rguzy@frickmeats.com)

636-239-2200 x143