



Food Safety Culture

– More Important than Ever!

Speaker: Donna F. Schaffner

**Assoc Director: Food Safety, QA & Training Programs
Rutgers Food Innovation Center, Bridgeton, NJ**

What IS “Food Safety Culture”?

GFSI definition

- Global Food Safety Initiative (GFSI) defines food safety culture as “shared values, beliefs and norms that affect mindset and behavior toward food safety in, across and throughout an organization.”



SQF (Safe Quality Foods):

- “Elements of Food Safety Culture are those elements of the **food safety management system** which the senior management of a company may use to drive the food safety culture within the company. These include, but are not limited to:

1. Communication
2. Training on food safety
3. Employee feedback
4. Performance Measurement

What IS “Food Safety Culture”?

“...with the FDA now actively talking about... regulating food safety culture... and the USDA likely to follow... companies need to assess where they stand on the continuum of food safety culture.”

“Food Safety Culture: what people do when no one is watching.”

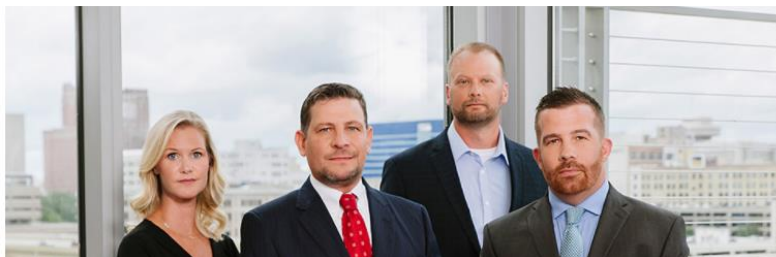
Shawn Stevens, Esq. —



“Many experts... say that food safety culture in a food facility can be measured by what employees do when no one is looking.”



WHO WE ARE: FOOD, ALL FOOD AND NOTHING BUT FOOD



Food Industry Counsel is the only law firm in The U.S. that works with the food industry Exclusively, helping food companies comply With FDA and USDA food safety regulations, Coordinate crisis management and recall efforts, defend and pursue food safety claims, and reduce food safety exposure.

FDA's "New Era of Smarter Food Safety"

Four Core Elements

- Core Element 1: Tech-Enabled Traceability
- Core Element 2: Smarter Tools and Approaches for Prevention and Outbreak Response
- Core Element 3: New Business Models and Retail Modernization
- Core Element 4: Food Safety Culture



<http://www.documentcompliance.com/post/fdas-new-era-for-smarter-food-safety-and-tech-enabled-traceability>

Mike Taylor and Frank Yiannas: New Era of Food Safety

“...people-focused, FSMA based, and *technology-enabled”

*key component = Interoperability – the ability of computer systems to use and exchange information.

“...traceability is going to utilize tech-enabled traceability software solutions to make a completely transparent supply chain.”

“...ultimate goal is that a consumer could scan a barcode on the food product they bought and they are able to see along the entire supply chain all the way to the farm where their product came from.”



Three tips for dealing with “FDA’s New Era of Food Safety”:

1 – Start with mindset

2 – Keep doing the fundamentals

3 – Get outside help



FDA's "New Era of Smarter Food Safety"

Core Element 4: Food Safety Culture



1st podcast: "Food Safety Culture as a science, not a slogan" 11-4-21

"culture is shared patterns of thought and behavior that characterize a social group, which are learned through socialization and persist through time."

...people based behaviors.

Frank Yiannas: "Effective Food Safety Culture is a pre-requisite / requirement for an Effective Food Safety Management System"

"Shared stories of people who were made ill or died as a result of a food-borne outbreak helps employees understand **why** Food Safety Behaviors are important to keep people safe & un-harmed."

<https://www.youtube.com/watch?v=IXm3dRH4B7s>



FDA's "New Era of Smarter Food Safety"

Core Element 4: Food Safety Culture

2nd podcast in the series:

"Making Leaders Risk Aware and Push to Reduce Risk" 2-16-22

"Gap between what our Food Company Leaders understand about Food Safety and what they **SHOULD** understand."

"Sharing the **FINACIAL IMPACT** of a foodborne outbreak resonates with Company Leaders more than the individual stories"

https://www.youtube.com/watch?v=9JoVN3bv3_o



Six key areas for positive food safety culture:

Reference - <https://www.navitas.eu.com/6-ways-to-create-a-positive-food-safety-culture/>

1) Management Commitment

Lead by example; demonstrate company expectations

2) Individual Responsibilities

Writing Food Safety expectations into job descriptions; use visual reminders

3) Great Communication & Training

Employees understanding **WHY** food safety is important with frequent reminders of the consequences of bad food safety practices



Six key areas for **positive food safety culture**:

Reference - <https://www.navitas.eu.com/6-ways-to-create-a-positive-food-safety-culture/>



4) **Resources**

People, time and \$ invested in training key personnel; bringing in a Food Safety Consultant if needed; investing in automated monitoring systems

5) **Monitoring & Review**

People will only perform to expectations that are regularly monitored, with visible consequences; individual accomplishments need to be recognized and celebrated

6) **Continuous Improvement**

As expectations are met, raise the bar, using **clear directions** and **encouragement** to do better.



Food-Safety-related training needed for **Supervisors**:

Supervisor on cell phone?



Supervisor's Role

- **Understand** Food Safety
- **Enforce** Food Safety-related behaviors
- **Educate** the Operators on Food Safety Concerns

Food Safety-related training needed for Supervisors?

- Management must show their support
 - Are THEY HACCP certified or PCQIs?
 - Do THEY attend employee training sessions?
 - New FDA requirements re managers' training
- Required for successful training programs:
 - The right *people,
 - time
 - \$\$\$

*Is HR on-board?



Food-Safety-related training needed for **Supervisors?**

GMPs, Personnel Hygiene & Adverse Health

- Per regulations
- Company specific details



Hazard Analysis Critical Control Points (for USDA/FSIS inspection)

- Maximum temperature of Receiving, Storage, Processing, Storage or Shipping
- Minimum temperature / Maximum time for “kill step”

Preventive Controls for Human Food (foods under FDA inspection)

- Max pH for vacuum sealed or “jarred” products
- Min water activity for “dry” or “shelf stable” products

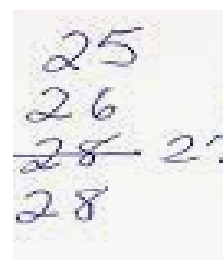
3rd party Audit Specifics?



Food-Safety-related training needed for Supervisors?

All Food Safety Programs

- Documentation basics
 - Original, at-the-time-observed, notations on logs
 - No writing on the hand/arm transcribing later
 - No writing on scraps of paper & transcribing later
 - Blue or black ballpoint pen
 - No pencil, erasable ink, gel pens that smear
 - No White-out, scribble-out or obliteration of values
 - Corrections clearly marked with explanation of “why”



*Oops! Mis-numbered
D.F. Schaffner 3/17/22*

Food-Safety-related training needed for **Supervisors?**

All Food Safety Programs

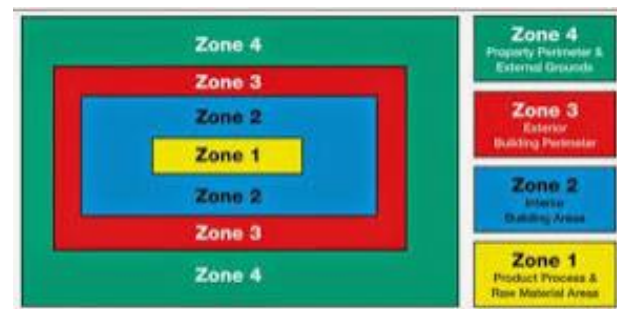
- Monitoring & Verification activities
 - 1st verification is review of monitoring records
 - Direct Observation? (USDA)
 - Making sure that monitoring is accurate & timely
 - Other verification activities as written into the HACCP or Food Safety Plan
 - Instrument calibrations
 - Proficiency training for employees
 - Independent means to prove “it worked”



Food-Safety-related training needed for **Maintenance?**

Food Contact Zones

- Clear understanding of Hygiene zones
- Actions appropriate to each zone



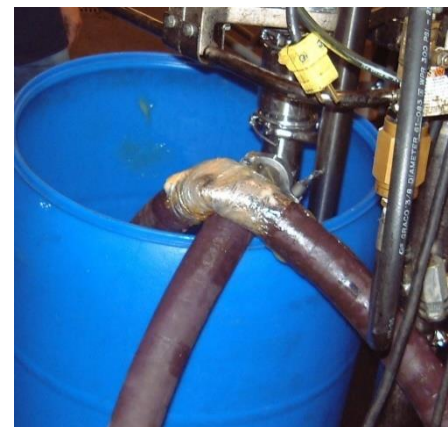
Cleaning **tools** before each use

- Biological hazards
- Allergen hazards



Temporary repairs

- No use of tape, plastic wrap, string or rope



Food-Safety-related training needed for **Line Workers?**

GMPs, Personal Hygiene & Adverse Health Conditions

- Company specific details

Preventive Controls for Human Food

- Job-specific duties
- Documentation specifics

HACCP (Meat, Milk, Poultry, Eggs)

- Job-specific duties
- Documentation specifics

3rd party Audit Specifics?

- Job-specific duties



What Food-Safety-related training is needed for your Employees completing documentation?

Recordkeeping basics

No “blank places” without explanation



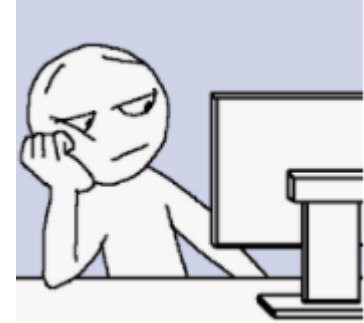
Important to establish the **TIME** for marking on records / log sheets;
which clock to use or should match to the coder printing product pkgs...

Important for employees to understand how documentation ties to the actual product being observed/measured **i.e. time stamp on pkg?**

Beyond “Training” to Behaviors...



What is it that **MOTIVATES** your different groups of employees?



Line workers?

Technical staff?



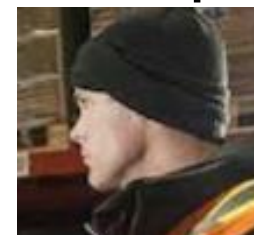
“Food Safety Culture is what people do when they think that no one is watching.”

Beyond “Training” to Behaviors...

How to approach someone who is not GMP compliant?

- Wearing hoodies

- What is a company-acceptable alternative?



- Wearing non-slip work-shoes

- Company supplied or purchase allowance given?



- Using cell phones

- What is the example set by supervisors?
- Is there a specific place to store cell phones outside of the processing environment?



Company-specific training for your HACCP or Food Safety Program details...

Company HACCP Plan CCPs:

Per finished product → Max pH or Min. temperature or Line speed...

Company Food Safety Plan PCs (Process, Allergen, Sanitation, Supply Chain)

Allergens: Which of the “**big 9** allergens” are used in your facility?

Are there “chemical sensitizer” ingredients: **Sulfites / Yellow #5**?

Is there a need for “**Scheduling**” or **allergen-clean washouts** after product changeovers to remove all allergen proteins?

Are **allergen-specific swabs** being used for testing surfaces?

Big NINE Allergens: Peanuts, Tree Nuts, Soy, Wheat, Milk, Eggs, Fish, Crustacean Shellfish, **Sesame**



Elements of Food Safety Culture training

- Need a regular schedule for training
 - GMPs, Personal Hygiene & Adverse Health
 - HACCP or Preventive Controls Food Safety Plan
 - Company-specific Food Safety details

| March 2022 | | | | | | |
|------------|----|----|----|----|----|----|
| Mo | Tu | We | Th | Fr | Sa | Su |
| 28 | 1 | 2 | 3 | 4 | 5 | 6 |
| 7 | 8 | 9 | 10 | 11 | 12 | 13 |
| 14 | 15 | 16 | 17 | 18 | 19 | 20 |
| 21 | 22 | 23 | 24 | 25 | 26 | 27 |
| 28 | 29 | 30 | 31 | 1 | 2 | 3 |
| 4 | 5 | 6 | 7 | 8 | 9 | 10 |

- How will you document the training?
 - “Training register” required by SQF
 - Signatures on **pre-printed** sign-in sheets
 - Make-up training for those who miss regularly scheduled time
- New Hires? Longer-term Employee refresher classes?



In Summary... Food Safety Culture

- Required by FDA and GFSI Audits
 - Understand the company definition
 - **All employees trained** to the company requirements
 - Training reflected in **Actions** – “what’s done when no one is looking”
- Food Safety Culture starts at the top of the management chain
 - **Supervisors** play a crucial role in the implementation of Food Safety Culture
 - Understanding / Training
 - Enforcement of policies
 - Educating Line workers
- **Every employee** taking personal responsibility
 - Actions reflect company expectations and regulatory requirements
 - Hiring practices may need to be adjusted... do you have the **RIGHT PEOPLE?**



Food Safety Culture – More Important than Ever!

Every person in the facility needs to know and understand:

My actions are important to **OUR** Food Safety Culture because...



Food Safety Culture – More Important than Ever!

Any Questions? 😊

Donna F Schaffner

Rutgers Food Innovation Center

450 East Broad Street , Bridgeton, NJ 08302

(732) 310-0953

www.foodinnovation.rutgers.edu

