

## PCHF Update

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### Goals

- Necessary changes
- Reflect updated information, update references, e.g. RFR, CDC
- Address regulatory guidance documents
- Streamline sections, reduce redundancy
- Simplify concepts
- Gain acceptance from third-party organizations as approved HACCP-based curriculum
- Make more accessible for small and mid-sized producers

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### Overall results from survey

- 127 respondents to survey
- There was a high levels of agreement (70%+) on many items
- Many excellent comments

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### Initial proposals

#### Preface

- Course management items, non-technical components
- Disclaimer
- Need for interaction
- What is FSPCA
- Introductions
  - What do participants want to get out of this course...where are they at on their food safety journey

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### Initial proposals

#### Introduction and regulation

- With course management material being moved into preface, focus on an overview of the food safety plan
- HACCP-based with brief history
- Regulation (which may be covered as a chapter at the start)
- Components as required in the regulation
- How it fits into a company's overall food safety plan
- Added slides at end of chapter for international explanations

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### Initial proposals

#### GMPs and other Prerequisite Programs

- Discussion of components or rules of GMPs regulation
- More detailed discussion of other prerequisite programs
- How these programs control hazards with examples

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### Initial proposals

Hazards – Biological, Chemical, Physical

- Discussion of factors affecting growth
- Include additional bacterial hazards with controls
- Add additional information on chemical hazards beyond allergens
- Discuss specific controls for chemical and physical hazards
- Add resource information on Economically Motivated hazards

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### Initial proposals

Hazard Analysis

- Streamline hazard evaluation process
- Incorporate use of Hazard Guide and example
- To be decided - separate chapter for previewing Preventive Controls

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### Initial proposals

Process Preventive Controls

- Link to HACCP
- Move in discussion of verification and validation
- Move in discussion of record keeping

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Initial proposals

Allergen Preventive Controls

- Discussion of interaction between control by prerequisite programs and control by an Allergen Preventive Control
- Add verification and record keeping

Sanitation Preventive Control

- Include discussion of allergen monitoring as a verification tool
- Add record keeping

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Initial proposals

Supply Chain Preventive Control

- Streamline chapter
- Discussion of supplier approval and then supplier maintenance
- Discussion of COA, LOC, and LOG (one slide) including limitations

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Initial proposals

Regulation

- Cover components of the entire FSMA regulation with emphasis of which sections may apply to food processors (IA for example)
- Discussion of regulatory oversight in the US

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