Preventive Controls for Human Food Workgroup: How We Got Here

Presented by:
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Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food (21 CFR Part 117)

Aka Preventive Controls for Human Food

Aka PCHF
The Food Safety Modernization Act (FSMA)

- Produce Safety Rule
- Preventive Controls for Human Food
- Foreign Supplier Verification Programs
- Accreditation of Third-party Auditors for Foreign Facilities
- Preventive Controls for Animal Food
- Mitigation for Intentional Adulteration
- Sanitary Transportation of Human and Animal Food
- Mitigation Strategies to Protect Food Against Intentional Adulteration
Training Alliances

• Comprised of industry, academia and regulatory partners
• Developed standardized training curriculum
FSPCA PCHF Training Curriculum

- Standardized curriculum recognized by FDA
- Aligns with FSMA PCHF rule
- Provides education regarding risk-based preventive controls
- Challenges encountered among less experienced small and medium scale processors
Regional Centers

FDA and USDA funded the development of a national center as well as 4 regional centers

- Goals aimed at improving coordinated training, education and outreach efforts related to food safety and compliance with FSMA.
Northeast Center to Advance Food Safety (NECAFS)

Focuses on coordination and facilitation of the Northeast regional network to support a national food safety training, education, extension, outreach, and technical assistance system among small and medium-sized producers and small processors, specifically around the FSMA Produce Safety Rule and the FSMA Preventive Controls for Human Foods Rule.
NECAFS Annual Conference and Meeting

Provides an opportunity for regional partners to connect in person to discuss current training, education and outreach trends and activities related to the FSMA associated Produce Safety Rule and the Preventive Controls for Human Food Rule.
PCHF focused meeting at 2\textsuperscript{nd} NECAFS conference

- **Goal**: build a cohesive strategy to address the needs of small to medium-sized food processors impacted by the FSMA PCHF rule.
- **Objective**: facilitated group discussions to determine successes, challenges and opportunities regarding the PCHF standardized curriculum training program.
- **Outcome**: determine priorities or focus areas for immediate group work
Meeting Summary

• Small and medium-scale facilities with less food safety experience struggled
  • understanding how the FSMA PCHF regulation impacts them
  • attending FSPCA training curriculum
  • finding reliable resources for help
  • Knowing where to go for training and help

• Need for regional coordination of PCHF related activities
Priorities Identified

AWARENESS
RESOURCES
EVALUATION
Before we adjourned....

Identified workgroup (WG) leads for each priority

Identified volunteer WG partners for each priority
Awareness Campaign Workgroup
Awareness Campaign Workgroup

**Goal:**
- Increase awareness of the FSMA PCHF regulation, especially among small and medium-scale facilities.

**Objectives:**
- Identify food safety communicators in Northeast region
- Develop portfolio outreach/awareness products
- Disseminate products to food safety communicators
Roadmap to Resources Workgroup
Roadmap to Resources Workgroup

Goal:
• Build a catalog of resources under defined categories specific to the needs of small and medium-scale facilities impacted by FSMA PCHF

Objectives:
• Create category content outline
• Identify and pool resources for each category
• Design and electronically publish and distribute
Evaluation: Training to Implementation Gap Analysis Workgroup
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Goal:

• identify knowledge gaps contributed to difficulties after taking the FSPCA PCHF training.

Objectives

• Develop PCHF training evaluation tool
• Promote regional usage
• Identify supports needed for compliance with PCHF rule
Workgroup Timeline Review

- **2018**: Identified focus areas or priorities and established workgroup leads.
- **2019**: Hired 2 project coordinators and formalized each plan of action.
- **2020**: Implemented each workgroup’s plan of action.
Today
Looking Forward

• Evaluation
  • Promote usage of evaluation tool
  • Provide data analysis

• Publish Roadmap to Resources
  • Identify resource gaps

• Awareness
  • Rollout postcard
  • Portfolio of products to emphasize NECAFS website

• Website

• New priorities or focus areas