Improving the Development of Food Safety Plans through the Advanced Preventive Controls School Initiative

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Problem Statement:

• The FSMA PCHF rule requires certain FDA-inspected facilities to have a food safety plan that includes an analysis of hazards and adequate risk-based preventive controls to minimize or prevent the identified hazards.

• Under the rule, certain individuals, known as PCQI, are responsible for identifying relevant food safety hazards, preparing or overseeing the preparation of the food safety plan, validating the effectiveness of preventive controls, reviewing records, and reanalyzing the food safety plan when needed.

• Lack of comprehensive advanced course to support small and very small companies dig deeper into the details of developing a food safety plan.

• The long-term goal of this project is to help increase FSMA regulatory compliance of small and very small facilities by building their capacity to develop and implement adequate food safety plans.
Approach / Methods:

**MODULE 1: Hazard Analysis and Risk Assessment [Wang/Chaves]**
- Hazard identification and evaluation
- Software demonstration and uses for food safety decision making

**MODULE 2: Process Controls [Chaves]**
- Use, selection, and interpretation of microbiological results - pathogen, surrogate, and indicator data
- Experimental design for in-plant validations

**MODULE 3: Food Allergen Management [Baumert/Downs]**
- Food allergen identification, labelling requirements, prevention of allergen cross contact, and validation and verification of food allergen controls

**MODULE 4: Environmental Monitoring [Chaves]**
- *Salmonella/Listeria EMP*
- Seek-and-Destroy approach
- Sampling and testing for a robust EMP
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CHALLENGES:
- COVID-19 pandemic travel and food-facility access restrictions
- Recruitment of PR and Guam interns
- Identifying actual food safety training and education needs in PR and Guam

ACCOMPLISHMENTS:
- Two PR interns completed – fall 2021 and fall 2022
- Two PR interns – spring 2023
- One Guam intern – summer 2023
- UoG collaborators attending IAFP 2022 in Pittsburgh, PA
- Exploratory trip to PR – December 7-14, 2022
- Training sessions in Guam – January 6-12, 2023

DISSEMINATION:
- Two virtual cGMP courses
- Two virtual EMP courses
- A food safety webinar series:
  - Food Safety Lunch Hour
- FARRP Food Allergen Fundamentals Virtual Course
- EMP course in Spanish

WHAT’S IN PROGRESS?
- Scholarly work around food safety practices and training needs in PR and Guam
- Guidance document on foreign material control
- A literature review of the microbiological safety status of foods in PR
- Digitalization of food safety courses
- Upcoming training visits to PR and Guam
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