

# PREVENTIVE CONTROLS FOR HUMAN FOODS

## PERSPECTIVE OCT 2018

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Wisconsin Department of Agriculture, Trade  
and Consumer Protection – Division of Food  
and Recreational Safety

WAFP Presentation – Troy Sprecker



# Thematic Overview

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Preparation - How the Bureau of Food and Recreational Businesses (BFRB) is preparing

Expectation – Discussion regarding items industry should expect during a Preventive Controls (PC) inspection

2011 Food Safety Modernization Act (FSMA) implemented – 2018 final stages of implementation are here. Stated goal is to be “Pro-active” towards food safety.



# BFRB Preparation – Bureau

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1 of 4 states last year to perform PC inspections under FDA contract (WA, FL, MN, WI)

*BFRB performed 3 PC inspections under FDA contract last year*

*2019 - 8 PC inspections planned by BFRB staff under FDA contract*

*Large Facilities – about 192; Facilities covered total = 1200+ in Wisconsin.*



# BFRB Preparation - Staff

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Philosophy – the better prepared our staff are, the more value they bring to you in industry

60 + staff PCQI trained through Food Safety Preventive Controls Alliance (FSPCA) training. Training where industry and regulatory receive the same information side-by-side – awareness level



PC Inspectors (3 - food) : senior & experienced; classroom FD 254 course; FDA shadow for original inspector; internally shadowed for 2 or more OJT. FSPCA training – PCQI

# BFRB Preparation - Staff

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Training Specialists (1 Manufactured Grade Dairy, 1 Manufactured Food): classroom FD coursework; FSPCA training – PCQI

Milk Sanitation Rating Officers – MSRO – (7) FDA course. This group deals with Grade A PC for PMO. Not implemented yet - Hurricane Florence hindered this.

National Training Cadre member – teaches the FD254 course at the national level. Helps to enable WI to stay connected with the latest understanding of everything PC.

# What to expect

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@ least 3 staff members on each visit

Some PC inspections have been 50+ hours in plant.

- Note: our normal inspections are still 1 day about annually

Pre-operation / Downtime equipment sanitation review

Environmental Sampling Program review – maybe swabs

Allergens & Sanitation

## Preventive Food Safety Systems

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# What to Expect – Hazards Guide

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It is a guide. However, I strongly recommended using it – FDA will.

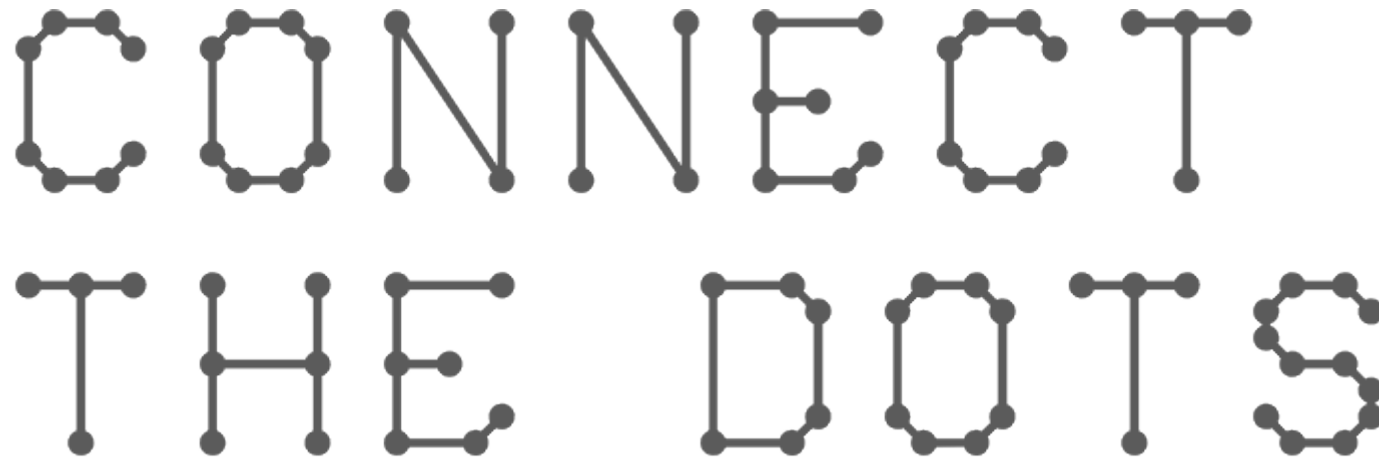
Appendix 1 in 3 sections – consult them all

# What to Expect - 'connect the dots'

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Validation literature must be able to connect to:

- the specific product
- the listed critical limit





# What to Expect – Evolution of Understanding

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The understanding of the application of the rule will evolve over time

Reminder to go beyond putting a fresh Food Safety Plan cover sheet on the old Haccp plan.

# Synopsis

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BFRB is preparing in such a way as to evolve with industry and regulatory as we all grow in understanding how to apply FSMA regulations.

- Includes continued staff training
- Transparently sharing what we learn as we go – also means a lot more comments on the inspection report
- Staff will likely be sharing guidance documents after routine inspections.
- Complicated and Depends

# Thank You!

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