FSPCA PREVENTIVE CONTROLS FOR HUMAN FOOD CURRICULUM

How Is It Different From HACCP Training?

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FSMA Implications for Suppliers to the USA and Training Opportunities
IAFP's 12th European Symposium on Food Safety, Athens, Greece
Discussion Topics

• Food Safety Preventive Controls Alliance background
• *FSPCA Preventive Controls for Human Food* curriculum
• Preventive controls versus HACCP
• How to access FSPCA training
• How to become and FSPCA Lead Instructor
FSPCA Background

• FDA recognized the need to assist the regulated industry to comply with the Food Safety Modernization Act
• FSPCA public/private partnership created to achieve this goal
FSPCA – Public/Private Partnership
FSPCA Preventive Controls for Human Food

- Version 1.2 is in use for Train-the-Trainer and Participant courses
- Translations under development
  - Spanish
  - Chinese
  - Japanese
  - French
  - Portuguese
  - Hindi
## FSPCA Preventive Controls for Human Food Agenda

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[Logo: FSPCA]
FSPCA Course Format

- Background and guidance information on food safety
- Food Safety Plan development
- Preventive Controls for Human Food regulation

Class exercises in hazard analysis and Food Safety Plan development
Risk-based Preventive Controls

- Focus on what matters most for food safety
- Preventive, not reactive
- Work in conjunction with and supported by other programs like Good Manufacturing Practices
- Designed to minimize the risk of food safety hazards
Historically HACCP Focuses on the Process

- Hazard Analysis
- Critical Control Points (CCPs)
- Critical Limits
- Monitor
- Corrective Action
- Verification & Recordkeeping
Preventive Controls Include More Than HACCP

- Hazard Analysis
- Preventive Controls (CCPs, allergen, sanitation, supplier, etc.)
- Parameters & Values
- Monitor
- Corrective Action or Corrections
- Verification & Recordkeeping
Preventive Food Safety Systems

Food Safety Plan
Including procedures for monitoring, corrective action and verification, as appropriate

Hazard Analysis

Process Control

Recall Plan

Supply-chain Program

Allergen Control

Sanitation Control

GMPs and Other Prerequisite Programs
What’s New in a Food Safety Plan

Hazard Analysis (Hazards to consider)

HACCP Plan
- Biological
- Chemical
- Physical

Food Safety Plan
- Biological
- Chemical (Includes radiological)
- Physical
- Economically motivated
What’s New in a Food Safety Plan

Preventive Controls

HACCP Plan

- CCPs for process controls

Food Safety Plan

- CCPs for process controls
- + Controls at other points that are not CCPs
What’s New in a Food Safety Plan

Parameters and Values

HACCP Plan

Critical Limits

Food Safety Plan

Critical Limits

Parameters that may not have minimum and maximum values
What’s New in a Food Safety Plan

Monitoring

HACCP Plan

Food Safety Plan

Required for CCPs

Required for CCPs

Required, as appropriate, for other preventive controls
What’s New in a Food Safety Plan

Corrective actions and Corrections

HACCP Plan

Corrective actions
- Identify & correct problem
- Reduce recurrence
- Evaluate food safety
- Prevent food from entering commence

Food Safety Plan

Corrective actions for CCPs

Corrections
In a timely manner for food allergens, sanitation and minor & isolated problems that don’t directly impact product safety
What’s New in a Food Safety Plan

Verification

HACCP Plan

For process controls

Food Safety Plan

As appropriate for process, allergen, sanitation controls

When supplier controls a known and reasonably foreseeable hazard
What’s New in a Food Safety Plan

Record-keeping

HACCP Plan
For process controls

Food Safety Plan
As appropriate for all preventive controls
What’s New in a Food Safety Plan

Recall Plan

HACCP Plan

Not required in the plan

Food Safety Plan

Required when a hazard requiring a preventive control is identified
FSPCA Delivery Model

Trainers-of-Trainers (ToTs) train Lead Instructors

Lead Instructors train Participants

Participants meet training requirements for PC Qualified Individual
FSPCA Human Food Courses

• Participant Courses
  ▪ 2.5 day face-to-face
  ▪ Blended Course (in development)
    ○ Online course coupled with one-day face-to-face

• Lead Instructor Courses
  ▪ Must apply to become a Lead Instructor
  ▪ 3-day Lead Instructor training combined with participant course (phasing out)
  ▪ 2-day Lead Instructor Training
    ○ Offered at IAFP annual meeting in 2016
    ○ Prerequisite: Participant Course
Upcoming Events

Training: Human Food

FSPCA Preventive Controls for Human Food

Course Description: The Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventive Controls for Human Food regulation (referred to as the Preventive Controls for Human Food regulation) is intended to ensure safe manufacturing/processing, packing and holding of food products for human consumption in the United States. The regulation requires that certain activities must be completed by a "preventive controls qualified individual" who has "successfully completed training in the development and application of risk-based preventive controls". This course developed by the FSPCA is the "standardized curriculum" recognized by FDA; successfully completing this course is one way to meet the requirements for a "preventive controls qualified individual."

These courses are taught by FSPCA Lead Instructors. These instructors have been instructed in how to teach the FDA-recognized standardized curriculum. Contact the instructors about their courses if you have questions.

Excel Spreadsheet of FSPCA Preventive Controls for Human Food Courses

Download a PDF of the FSPCA Preventive Controls for Human Food Participant Manual

Download a PDF of the Errata Sheet for FSPCA Preventive Controls for Human Food Participant Manual 1.0 and 1.1

FSPCA Bookstore

FSPCA Preventive Controls for Human Food Lead Instructor Training

Course Description: This course provides the participant the knowledge and tools needed to perform the duties of a Lead Instructor for the standardized training curriculum that FDA considers adequate in meeting the requirements for training of a preventive controls qualified
Benefits of FSPCA Preventive Controls Course

• The *FSPCA Preventive Controls for Human Food* course is the “standardized curriculum” recognized by FDA

• Lead Instructors have access to:
  ▪ “Instructor Notes” to assist with delivery and interpretation
  ▪ Exercise guides and instructions to reinforce key learning objectives
  ▪ Simplified model foods for exercises that are consistent with regulatory requirements
  ▪ All current resources and information that the Alliance provides
Become a Lead Instructor

• Apply now on FSPCA website
• Meet the criteria
  ▪ Education, work experience, training experience
• Attend Lead Instructor Training
  ▪ Teaching the key points
  ▪ Adult learning refresher
  ▪ Course and certificate administration
In Conclusion

- The Food Safety Preventive Controls Alliance has developed the standardized curriculum recognized by FDA for preventive controls qualified individuals.
- Successful completion of the FSPCA course is one way to become a preventive controls qualified individual.
- FSPCA training has much in common with HACCP.

continued
More Conclusions

• Hazard analysis may identify hazards requiring preventive control including:
  ▪ Process controls
  ▪ Food allergen controls
  ▪ Sanitation controls
  ▪ Supply-chain-applied controls
  ▪ Potentially other controls

• The *FSPCA Preventive Controls for Human Food Participant Manual* is available on line

• Apply to become a Lead Instructor on the FSPCA website
Questions and Access to FSPCA Course Information

Please visit the FSPCA website at http://www.iit.edu/ifsh/alliance for

• resources on preventive controls
• lead instructor application
• details of other FSPCA activities