



Developing and Implementing a Successful Food Safety Management System

With the increase in food recalls, consumers' confidence in food safety is at an all-time low. Many feel that the government is not doing enough to protect our food supply from potential hazards like Salmonella and E coli. As a result, an increasing number of U.S. food manufacturers are now requiring that their suppliers become certified to one of the Global Food Safety Initiative (GFSI) food safety management system (FSMS) standards.

This movement toward certification escalated when retail giants like Wal-Mart issued a mandate to their suppliers that they must be certified. The list of foodservice and manufacturing companies requiring certification is growing in leaps and bounds every day.

There are currently five GFSI approved standards, but there are three that are quickly gaining popularity in the U.S. All three of these standards are similar in many ways. They include:

- Safe Quality Food (SQF)
- British Retail Consortium (BRC)
- Food Safety System Certification 22000 (FSSC 22000) - a combination of ISO 22000 and PAS 220

Regardless of the standard you choose for your business, there are several steps that you can follow to help ensure the successful development, implementation and adoption of your food safety management system.

1. Understand the requirements of the standard. Obtain a copy of the standard and read it – a lot. After you have reviewed it several times, consider attending a training seminar to better understand the requirements and what it takes to satisfy them.

While building your knowledge on the selected food safety standard, identify and assign a team leader. This person is typically the person who currently oversees your company's food safety program. The team leader should then form a team to participate in the creation and implementation of the system. Make sure the team is multi-functional and includes representation from upper management to employees from the line.

In addition to being a requirement of many of the food safety standards, multi-functional teams provide varied viewpoints of what your system should include. For example, a sanitation employee looks at things much differently than his production counterpart. That difference will help create a more comprehensive system.

Many companies seek the help of an outside expert or consultant. This can prove to be beneficial since they will bring new ideas to the team. Remember to stay involved in the project and do not let the consultant solely develop your system. Although it may seem more expedient to let the consultant have complete control, the system they create may not include procedures that are essential and specific to your operation. You cannot depend on the consultant for the thoroughness your team can provide. Imagine how much harder it would be to implement the new system if your team had very minimal input and no ownership in the project.

When planning your budget, take into consideration other expenses besides consulting such as any training and software you may need to help you manage your new system.



2. Gain and maintain support from upper management. Although upper management might have agreed a standard needed to be implemented, do they really support it? Or do they view it as just another necessary evil to continue to do business with a specific customer?

It is important upper management understands it's not just another expense against the company's bottom line. They must understand that food safety standards also improve business efficiencies and create a stronger safety system – reducing the threat of food borne illness. Management must also be willing to continue supporting this effort to ensure the successful implementation, as well as provide/ allocate the resources needed. These resources may include those needed in the development process and implementation or maintenance of the finished system. It is also important for management to verbally support the program so it does not become a "Quality Assurance only" program. The entire company must buy into the program. The best way to get companywide support is to have it start at the top.

3. Determine what it takes to become certified. How much do you have to do to satisfy the requirements of the standard? To find out, perform a Gap Analysis. This will help you identify what you have versus what you need.

Since every company in the food industry commonly has prerequisite programs and procedures in place to manage their operation, not all system documents have to be created from scratch. An efficient method to use when performing a GAP Analysis is to develop a matrix with the requirements of the standard in one column and your current procedure that satisfies that requirement in another column. When you find an empty space next to the requirement, you have identified a "gap." Although your current procedure that satisfy a requirement may need to be reviewed and modified, but it is something to build upon. The Gap Analysis will establish the size of your project and the time you will need to complete it.

4. Create a game plan. If your team was not involved in the Gap Analysis, now is the time to get them involved. Assign responsibilities and timelines to team members for the actions identified in the Gap Analysis. Document your game plan in the current format your company uses for other projects, and make sure timelines are clearly stated and understood by each member of the team. The team should meet on a regular basis to determine the status of each deliverable or need identified.

5. Identify procedures and polices needed and document them. If you do not use a document numbering system, consider adopting one so documents can be easily tracked. Developing and adopting a numbering system early in the process before you start creating new documents will reduce extra and unnecessary work.

One of the first procedures you should develop is document control. The document control procedure should include controls on how documents are approved, changed, maintained and used. Create a template for policies, procedures, work instructions and flow charts so all of your documents look the same. Ideally, different people within your organization will be creating documents, so having a consistent format will improve their effectiveness.

Remember, this is a team effort and the team leader should not be doing all of the work. One of the challenges of creating documents to manage your system is determining how many documents are needed. The following are some questions to ask when creating a document.

Will the document:

- Satisfy a requirement in the standard?
- Prevent the loss of a specific detail?
- Control the sequence, steps or other activities in a process?
- Define and provide for the consistency of results or outcomes?
- Fulfill a regulatory requirement not addressed in the standard?
- Aid in training of personnel?



6. Review your company's HACCP program. HACCP is required by all of the food safety standards, and each one requires the Codex HACCP methodology. Your food safety team needs to pay special attention to your hazard analysis and the identification of your food safety hazards. Make sure each step of the HACCP twelve-step process is documented so it can be reviewed by the auditor and your team when you reassess your plan.

7. Identify exclusions or alternative methods. Most of the GFSI standards allow for exclusions or alternative methods to be permitted to their requirements. These exclusions or alternative methods must be supported by a detailed risk analysis that outlines the basis for any exclusion or alternative control measure and demonstrates that food safety is not compromised.

8. Implement procedures and documents as they are approved. A common mistake companies make is waiting until their entire system is documented before implementation. It is best to employ each section as they are completed so the task of implementation is minimized and can be controlled and monitored more easily. If implementation is delayed until the entire system is documented, it will appear to be too large of a program and may create anxiety among employees.

Communication throughout the organization is critical during implementation. It should be constant and consistent. Everyone should understand the value of a food safety management system and why it is important to provide the safest product possible to their customer.

9. Train employees and document it. Training requires a large time commitment if it is to be done correctly. It can also be seen as a large expense. This is where support from upper management is important. Food safety is everyone's responsibility. Effective training to adopt the system is key to a successful food safety management system. Remember, a common rule of thumb – any activity performed without a record doesn't exist.

10. Validate and verify. Is your system working as it was intended? Are your control measures and critical limits in your HACCP program controlling the identified hazards? If the answer is no, reassess this part of the system.

The performance of internal audits is critical at this stage of the process. Confirm your auditors are properly trained and consistent. Any deficiencies or deviations found should be reviewed and corrected. Any system failures should be analyzed with their root cause identified so proper corrective action can be applied. You should also review any deviation and evaluate if it could occur in any other area of your system. If it can, correct it before it occurs.

One of the requirements for all of the GFSI standards is continual improvement. Your system should be reassessed frequently in the first year to help ensure it is functioning as designed. Utilize trends, internal audit findings and previous non-conformances to help identify opportunities for improvement.

11. Perform a pre-assessment or "practice" audit. Work with an accredited certification body or consultant and have an auditor perform a pre-assessment exactly like the certification audit would be conducted. This is commonly referred to as a "practice" audit. The pre-assessment should include common audit techniques, like employee interviews, so your employees can become accustomed to the process. If any shortcomings are identified during the practice audit, correct them and schedule your certification audit.

Remember, the development, implementation and maintenance of a successful food safety management system cannot be done alone. Companies must adopt a companywide culture that emphasizes the importance of food safety. It's up to companies in the food industry to focus on improving the quality and safety of the food. Only with this increased focus will the food industry be able to once again gain the trust and confidence consumers once had in the food chain.



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