



**FOOD SAFETY
PALOOZA 2023**

FDA Retail Food Protection Seminar

What version of Food Code is adopted by your state?

1995-1

2001-1

2007-1 (Has own code based on older version)

2009-1

2013-2

2017-6

2022-1

Not adopted – 1

Interesting points

- Some states provide 2 different codes
- Some states do not adopt as a whole; modify or only adopt parts



Name one hurdle to adoption or regulation

- Legislative process - long process, finding sponsor, priorities
 - Government process in general
- Time
- Different statutes and processes for each state
- Restrictive language
- Opposition to specific sections of the code (CFPM, Allergens, etc.)
- Covid
- Agreement by stake
- **POLITICS**



Are you familiar with Conference for Food Protection and how they influence the Food Code? If so, how?

- 50 responses of YES
- 8 response of NO
- 13 people either attended CFP or are participating on committees or councils
- CFP is where Industry, academia, and regulatory come together in a consensus building process to propose science-based changes to the FDA Food Code.

What is a strategy you use for behavioral changes in food safety?

- Food safety culture, active managerial control, help them understand the “WHY”
- Positive reinforcement; give praise when due
- Tell a story (give real life examples) to help them understand why food safety and requirements are important
- Ask about barriers the facility has; use feedback to drive change that works for the facility; helps get buy in from facility
- Explain how a procedure change for food safety will ultimately save them time and/or money
- Have a person-to-person conversation instead of regulator vs. operator; see them as a human as opposed to just a food handler
- Adding food safety practices (e.g., cooling time/temperature parameters & methods) into recipes
- Spend time helping show them different strategies to accomplish food safety
- Ensure inspection consistency between different inspectors/auditors
- Food safety education of both industry and public
- Inspector models proper behavior (e.g., washing hands when needed, avoids bare hand contact with ready-to-eat food) while conducting inspection
- Education before regulate





How do you ensure uniform training of new inspectors/auditors?

- VNRF RPS-Standard 2
- Trainers who are standardized utilizing FDA Procedures for Standardization of Retail Food Safety Inspection Officers
- Mentorship program with experienced persons
- Joint inspections with peers
- Continuous QA checks after initial training
- Use of 3rd party auditing company
- Routine meetings/calls with staff to discuss issues
- CFP Field Training Manual for Regulatory Retail Food Safety and Inspection Officers
- Calibration of the trainers (audit the auditor)
- Well developed written policies outlining training with documentation logs and oversight by supervisor
- Provide readily available reference/education/resource materials
- Training programs for specialized topics (e.g., food processes involving variance and/or HACCP)
- Encourage open communication between trainer and trainee

What does specialized food processing in Food Code mean to you?

- Options for operating outside of the Food Code by using science to prove the process is safe
- A firm understanding of all food safety practices such as:
 - special packaging
 - smoking for preservation
 - other preservation
 - shelf-life extension
 - ROP
 - TCS to non-TCS
 - curing
 - fermentation
 - pickling
 - acidification
 - canning
 - packaging fresh squeezed juice
- HACCP and/or variance – steps, approved by regulatory authority, to handle it safely based on specific process for the establishment's unique challenges by identifying the CCPs and establish appropriate CLs to prevent hazards
 - CCLs – can include temperature, pH, A_w
- A unique way an establishment can provide efficient/quicker service, a new trend
- Both industry and regulators need education to increase understanding what processes are needed for a HACCP/Variance, while regulatory needs to assist operators to do it safely, and provide education as trends change
- Regulatory can find clarity through collaboration with others and can help industry by creating and providing templates
- “It Depends and It’s Complicated”; this means I must work harder, there will be a lot of paperwork, try to talk facility out of it, intimidating, bad idea, not for beginners, confusing, complex

