

HOW WILL THE FSMA REGULATIONS EFFECT THE FEED INDUSTRY'S SUPPLY CHAIN PROGRAM



As the Feed Industry and associated partners start dissecting the new FSMA Regulations (Food Safety Modernization Act), questions regarding what is required of raw material suppliers have become more common.

The FSMA Regulations have dedicated an entire section (CFR, part 507 Subpart E) to the regulations for the "supply chain." With the new regulations, human food, livestock feed and pet food companies are required to take a new approach to their Hazard Analysis Critical Control Point (HACCP) plans and focus on Hazard Analysis Risk-Based Preventive Controls (HARPC).

When looking specifically at a company's food safety plan and supplier approval program, a company will need a Preventive Control Qualified Individual (PCQI) specializing in hazard analysis to conduct an assessment of all reasonably foreseeable hazards. This analysis must include each type of animal food manufactured, processed, packed or supplied to the company. Evaluation of these hazards also need to include biological, chemical and physical factors.

Companies will be required to develop a written risk-based supply chain program with their suppliers of raw material or ingredients. This plan will need to include hazard analysis specific to the supplier. If a hazard is known or reasonably foreseeable, the company will need to ensure that a supplier has preventive controls in place and has implemented them prior to receiving the raw material. Once a company has finalized their plan, FSMA regulations will allow that facility to rely on audits provided by their supplier. The only caveat is that these audits must be conducted by a third-party qualified auditor.



One could make the argument that a majority of the hazards identified through the company's plan can be managed by the implementation of Current Good Manufacturing Practices (CGMPs) or prerequisite programs. Hazards that cannot be controlled by CGMPs will need to be isolated within the receiving company's food safety plan and incorporate additional preventive controls to assure product safety. The preventive controls will need to include verification, validation and appropriate records documenting the control measures. As our global supply chain continues to change, preventive controls similar to FSMA will continue to force the food and feed industries to become more and more pro-active rather than re-active.

NSF International offers farm to fork consulting, training, auditing, certification*, testing and technical services throughout the supply chain and across all industry sectors. If you have questions regarding FSMA and its effect on your business, contact NSF at animalfeed@nsf.org.

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