

6 best practices to create a successful food safety program

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There is no substitute for a systematic “one step at a time” approach for building a successful company food safety program, according to Jeff Mitchell, IFCO’s North America Director of Food Safety. In this PDF, Mitchell discloses the steps to create a food safety program as well as other best practices necessary to support it, including forging partnerships, effective communications, creating a food safety culture, evidence-based decision making and managing innovation.

Mitchell’s background includes more than 28 years of experience in food safety and public health. He served as a Command Food Safety Officer for the Department of Defense, and for the past eight years has worked closely with both retail and food processing industries. His goal is to use his professional experience and learnings as a positive contribution to protecting public health.



Best practice #1: Take it step by step

As a first best practice, Mitchell recommends a step by step approach when developing a food safety program, and he cautions that those steps must be undertaken in sequence to achieve the desired result.

Step 1: Perform a risk assessment

This initial step involves identifying food safety hazards, their severity of risk, and critical control points. Food safety hazards can include biological, chemical or physical hazards. In this step, as in the others that follow, Mitchell stresses the importance of evidence-based decision making.

Step 2: Establish the food safety program

Once risks have been assessed, a program must be established which spells out how the risks will be controlled, including documentation, training requirements, and the establishment of critical monitoring points. Simply put, a critical control point is a point, step or procedure at which controls can be applied to eliminate a food safety hazard or reduce it to an acceptable level.



Step 3: Validation of critical control points

“Any time you have controls in place, you have to validate that they work,” Mitchell explained. “A lot of people will forget to do that. You validate your control points and your food safety program to make sure they work, and that they reduce the risk as intended.”

Step 4: Employee training

The people who are performing the processes to the standards that have been written and validated must be trained. They must learn how to perform the procedures, the critical measurements required, and what corrective actions may be needed.

Step 5: Execution

“After training comes execution,” Mitchell continued. “Now the employees have to execute to the established standards. They monitor limits, they execute the process, and they do it in accordance with the food safety plan.”

Step 6: Verification

The verification process is in place to make sure that the food safety plan is meeting its objectives. “In the food safety world there are two ways of verifying your process,” Mitchell said. One of these approaches is environmental monitoring. It involves swabbing surfaces using a zonal approach and



performing laboratory analysis to ensure that bacterial levels are acceptable. The other way to verify your food safety plan is through third-party inspections. “A third party comes in, and they take a snapshot,” Mitchell explained. “They look at your standards, and they audit your standards to make sure that people are executing to those standards and are documenting their results properly.”

Step 7: Documentation

Documentation provides a record that all necessary actions have taken place following the food safety plan, including the steps listed above, starting with risk assessment and finishing with verification. Documentation ensures that the operation has a record of its process to prove it is within safe limits. It also provides the basis for supplier verification. For example, if any RPC rental customer wants to verify that IFCO has all the necessary food safety systems in place and that they are running effectively, Mitchell can share the IFCO Supplier Verification Packet containing the required documentation.

“With the passing of the Food Safety Modernization Act as well as the Safe Food for Canadians Regulations, people who are manufacturing and processing food and selling it to a customer. They must ensure that their suppliers, who supply all the raw materials to them, are following all of these guidelines,” Mitchell said. “That’s how they verify that their suppliers are safe and have a sound food safety program.”

With the establishment of an effective food safety program, Mitchell identified other recommended best practices needed to support it.



Best practice #2: Develop a food safety culture

According to Mitchell, your food safety culture can make or break your program. The food safety plan, no matter how well it is crafted, will not succeed if the operation does not fully engage the people involved. And it isn't just about the line level employees – it's also about the management. "From management on down, everyone has to truly believe food safety is important for the right reasons," he said. "If you don't have a strong food safety culture, people take shortcuts."

"Say you have two people from the production line going to the bathroom at the same time," Mitchell elaborated. "And one of them doesn't wash his hands before coming back on the line, and the other person doesn't say anything. That's bad culture. Good culture is the person stopping the coworker and saying, 'Hey, you have to wash your hands, you are going to be handling food products.' The reason for food safety culture is so that you don't take shortcuts."

He stresses the importance of management buying into the food safety culture. If employees see that management isn't entirely on board, then they won't be either. "From management on down, they have to believe in food safety for the right reasons. They have to know it is important because if they don't have the right culture, the right decisions won't be made," Mitchell said. "The decisions will be made for production numbers in lieu of risk."



Best practice #3: Have effective communications

Mitchell underscores the importance of effective cross-functional communications as a best practice. He says that good communications include two crucial components. One, obviously, is the communication of problems. The other essential element is the communication of successes and process improvements. “That’s one that goes unnoticed, and it is probably more important than the other,” Mitchell commented. “When you see something working in one facility, and you have a network of facilities, the improvement should be shared to all facilities.”

He details one example of how an IFCO service center created a more holistic approach to dealing with customer service issues, which was subsequently adopted by other locations. Instead of making the customer complaint investigation primarily a paper trail process leading to a corrective action report, the service center took a more hands-on approach. Managers huddled with the line leads responsible for quality assurance. They brought out the RPCs in question and walked through the scenario on the plant floor as part of the corrective action process. Pictures were taken and posted on the bulletin board in the area that was responsible. When it comes to communications, as the old saying goes, sometimes actions speak louder than words.



Best practice #4: Employ evidence-based decision making

Mitchell is a firm proponent of evidence-based decision making as a food safety best practice. He cautions against making decisions based on opinions, gossip, or just doing what others are doing. It is part of an established management culture for leaders to come up with quick decisions based on incomplete information. Uninformed decision making can have severe repercussions in the food safety.

“People will make the wrong decision because it fixes the problem more quickly, but in the long run it doesn’t solve the bigger issue,” Mitchell said. “So whenever you are making decisions at the executive level, you have to perform evidence-based decision making. In the food safety world that is based on what your data is telling you, what your environmental monitoring is telling you, and what research is telling you.”

According to the [Center for Evidence-Based Management](#), evidence-based practice is about making decisions through the conscientious, explicit and judicious use of the best available evidence from multiple sources to increase the likelihood of a favorable outcome. Steps of such an approach include:

1. Asking: translating a practical issue or problem into an answerable question
2. Acquiring: systematically searching for and retrieving the evidence
3. Appraising: critically judging the trustworthiness and relevance of the evidence
4. Aggregating: weighing and pulling together the evidence
5. Applying: incorporating the evidence into the decision-making process
6. Assessing: evaluating the outcome of the decision taken

“If you have followed all of the evidence, you are always going to make the right decisions,” Mitchell said. Those decisions might not be popular, but that’s what you have to do. This is about food safety. It is important.”



Best practice #5: Foster partnerships

Mitchell is an advocate of fostering partnerships with customers and suppliers, as well as strong bonds through industry groups. In the case of IFCO, Mitchell communicates to the industry through United Fresh, the Produce Marketing Association, and the Canadian Produce Marketing Association. He is a member of various industry food safety councils and committees.

When it comes to working with suppliers and customers alike, it is crucial to be on the same page to deliver optimal food safety. Mitchell points to IFCO's wash chemical supplier as an example. "They have to be partners in helping us achieve our end goal," he said. "They have to understand our strategy. If they don't know it, how can they help us? The same thing applies to our customers' end goals. If we don't know what they are trying to accomplish, how can we help them?"



Best practice #6: Continuously automate and innovate

Innovation and automation are ongoing for IFCO, as they are across the fresh supply chain. Changes tied to trends such as IoT can offer essential advantages from a food safety perspective. For example, IFCO introduced SmartGuardian. SmartGuardian is an innovative software that monitors and controls IFCO's RPC cleaning and sanitation process to ensure it meets strict company and industry standards. Water pressure and temperature, detergent and disinfectant concentrations and contact time are continually monitored via sensors to ensure each RPC is processed correctly. If any parameter is not in line with the specified value, the system automatically sends an alert or may stop the wash machine.

Automated data capture can be extremely valuable from a food safety perspective. "For any company that is manufacturing or processing products," Mitchell explained, "automation gives you much more reliable data on a much more consistent basis, and makes it searchable so you can get granularity and find problems quicker." He offers the example of a product recall. While tracing shipments involved in a recall might take more than one person a day or more to accomplish in a manual paper trail environment, digitization can dramatically speed up the process. "Automation can cut that down to less than an hour because the data is readily accessible and minable," he said.

Attention to food safety best practices, including the step by step approach to building a successful food safety program, indeed can make a difference. And as Mitchell stresses, from management on down, people have to believe in food safety for the right reasons. What's your next step?

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