

# Strengthening Your Food Safety Culture



# Agenda

- Food Safety Culture
- Top Misses in Milling
- FDA

# What is Food Safety Culture?

Elements of an #Enviably workplace culture:



# What is Culture?

- Corporate culture is a collection of:
  - Ideas
  - Values
  - Beliefs
  - Attitudes
- Together promote behavioral norms
- Visible and Invisible





# What Makes a Great Company Culture?

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# Great Culture

- Visible Environment
- Mood
- Actions and Execution

# Signs That You Are...

**Going Through The**



**Motions**



# Going Through the Motions

1. Following rules without understanding
2. Consistently failing or just passing inspections/audits
3. Developing workarounds
4. Objecting to unannounced audits
5. Failing to determine root causes
6. Failing to learn from mistakes
7. Pretending



# Food Safety Culture Models

- Behavior-Based FSMS Continuous Improvement Model
- Griffith Food Safety Culture Model
- Jespersen Food Safety Culture Dimensional Framework
- GFSI Food Safety Culture Model

## **Commonalities:**

1. Management Commitment
  2. Learning and behavior reinforcement
  3. Food Safety measurement/metrics
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# Senior Level Management

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# Walk the Talk



# Nurture

- Nurture a positive food safety culture by:
  - Removing barriers that impact the ability of individuals from contributing to food safety
  - Focus on strengths
- Sign the HACCP Master Plan or the Food Safety Plan



# Smart Goals

- Common food safety metrics are:
  - Food safety complaints
  - Non-conformances
  - CCP compliance
  - Food safety training completed as a % of staff
  - Supplier approval rating
  - Inspection, audit, and housekeeping scores
  - Total Cost of Compliance (TCC)



# Line Shutdowns

Authorize employees to shut down if the product is unsafe- discussed at monthly plant meeting

# Reinforcements

- Visual aids specific to their lines
- Forget “Think Food Safety” instead “Watch out for Metal to metal”
- Move visuals so no one is desensitized



# Pest Sighting Log

- Provide incentives

# Positive

- “Caught You” (doing it right)
- “Gotcha”
- Incentives (food safety hero shirt, hats, cups)

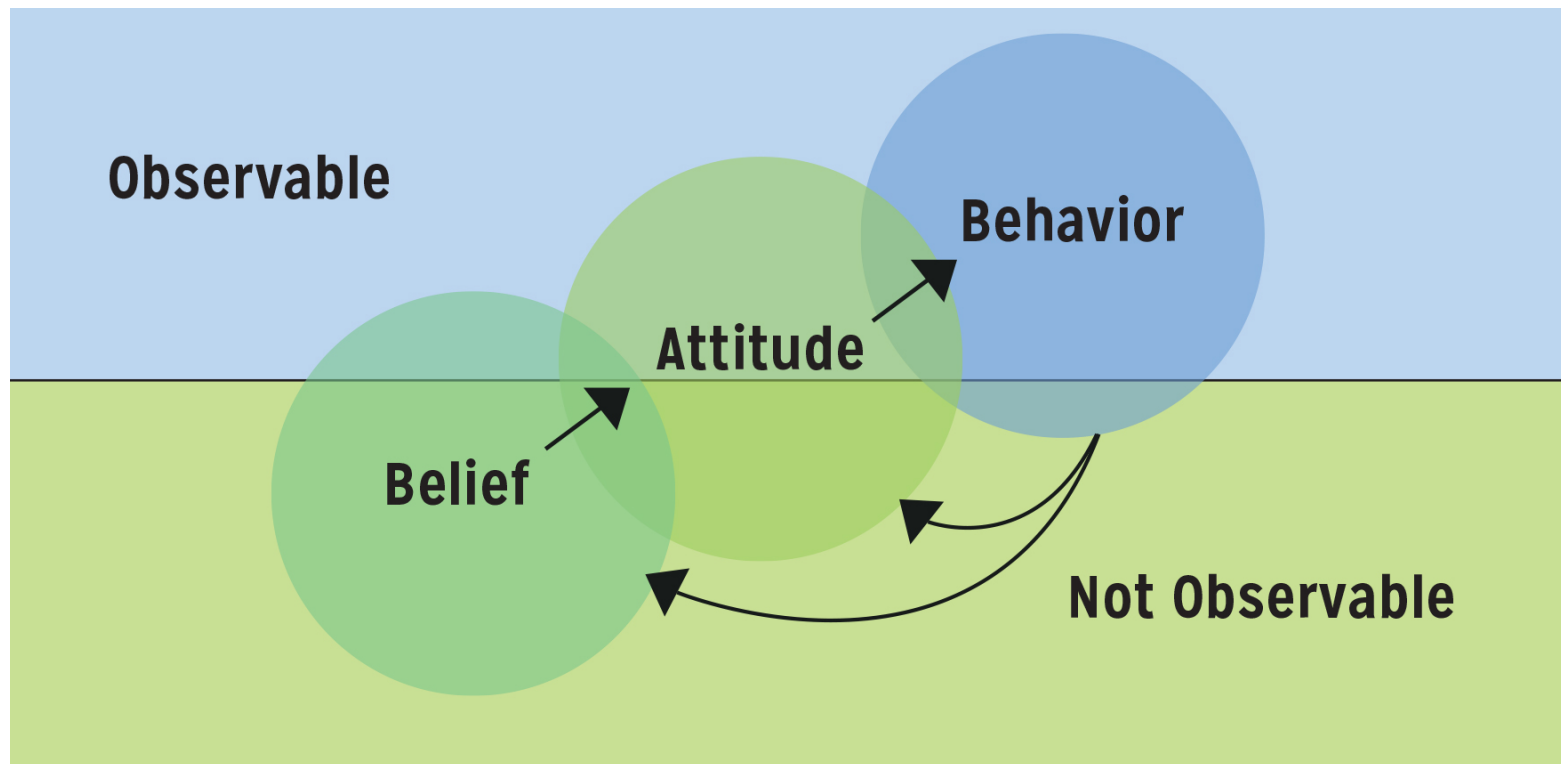
# Consistency

- Be consistent with the signals, messages sent to the company team
- Always support food safety no matter the circumstances



# Summary

## Food Safety Culture



# Top Misses Milling

## FD&C Section 402(a)(4)

A food shall be deemed adulterated if it has been prepared, packed, or held under insanitary conditions whereby it **may** have become contaminated or whereby it **may** have been rendered injurious to health.

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# Part 117 “May” Explained...

Current Good Manufacturing Practice, hazard analysis, and risk based preventive controls for human food

- Subpart B--Current Good Manufacturing Practice

[§ 117.10](#) - Personnel.

[§ 117.20](#) - Plant and grounds.

[§ 117.35](#) - Sanitary operations.

[§ 117.37](#) - Sanitary facilities and controls.

[§ 117.40](#) - Equipment and utensils.

[§ 117.80](#) - Processes and controls.

[§ 117.93](#) - Warehousing and distribution.

[§ 117.95](#) - Holding and distribution of human food by-products for use as animal food.

[§ 117.110](#) - Defect action levels.

# The “Standards”

Prerequisite and Food  
Safety Programs

Facilities

on Centers

Packaging  
Facilities

Packaging  
Facilities

The AIB International  
Consolidated Standards for Inspection



ards for Inspection



s for Inspection



ds for Inspection



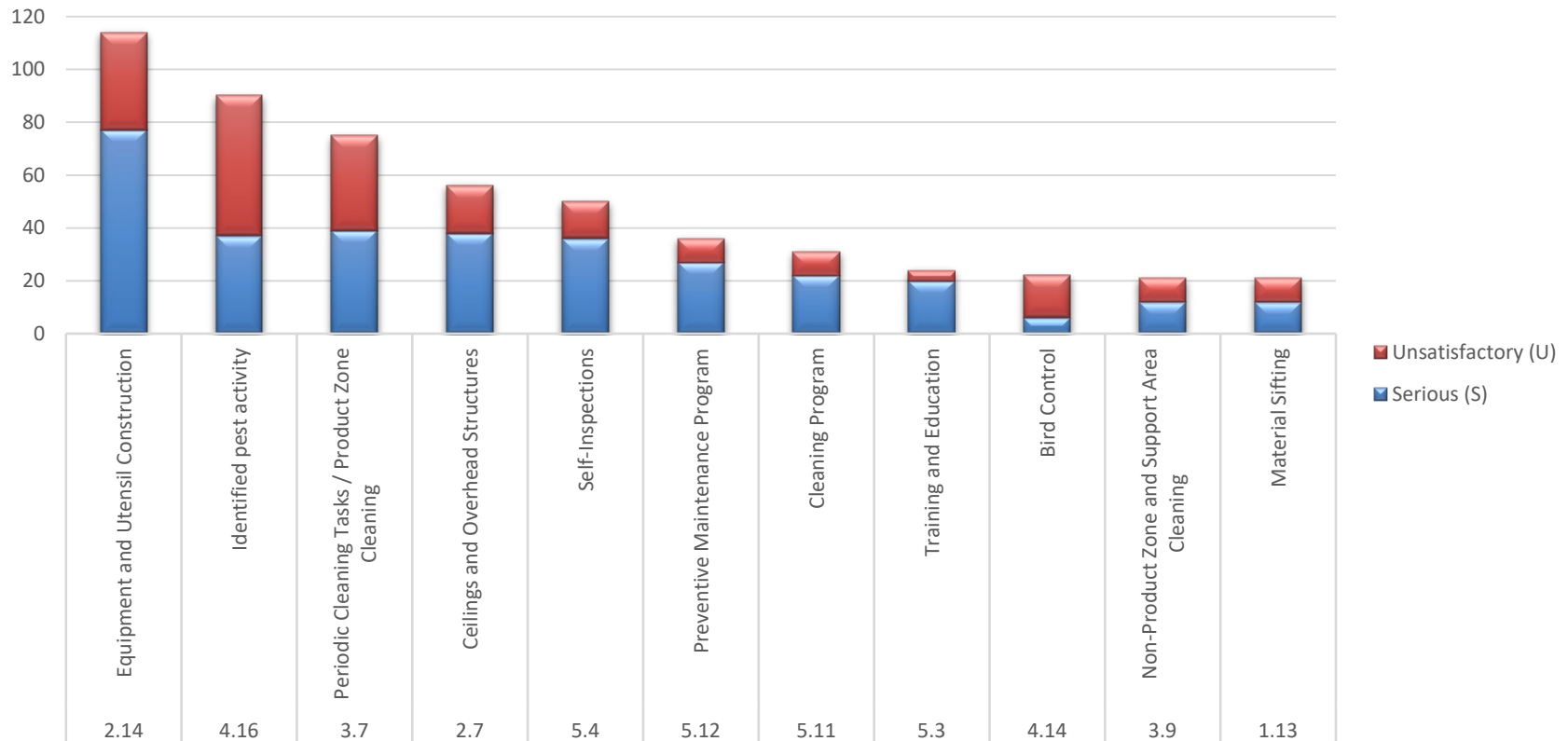
ds for Inspection





# 2019-2021

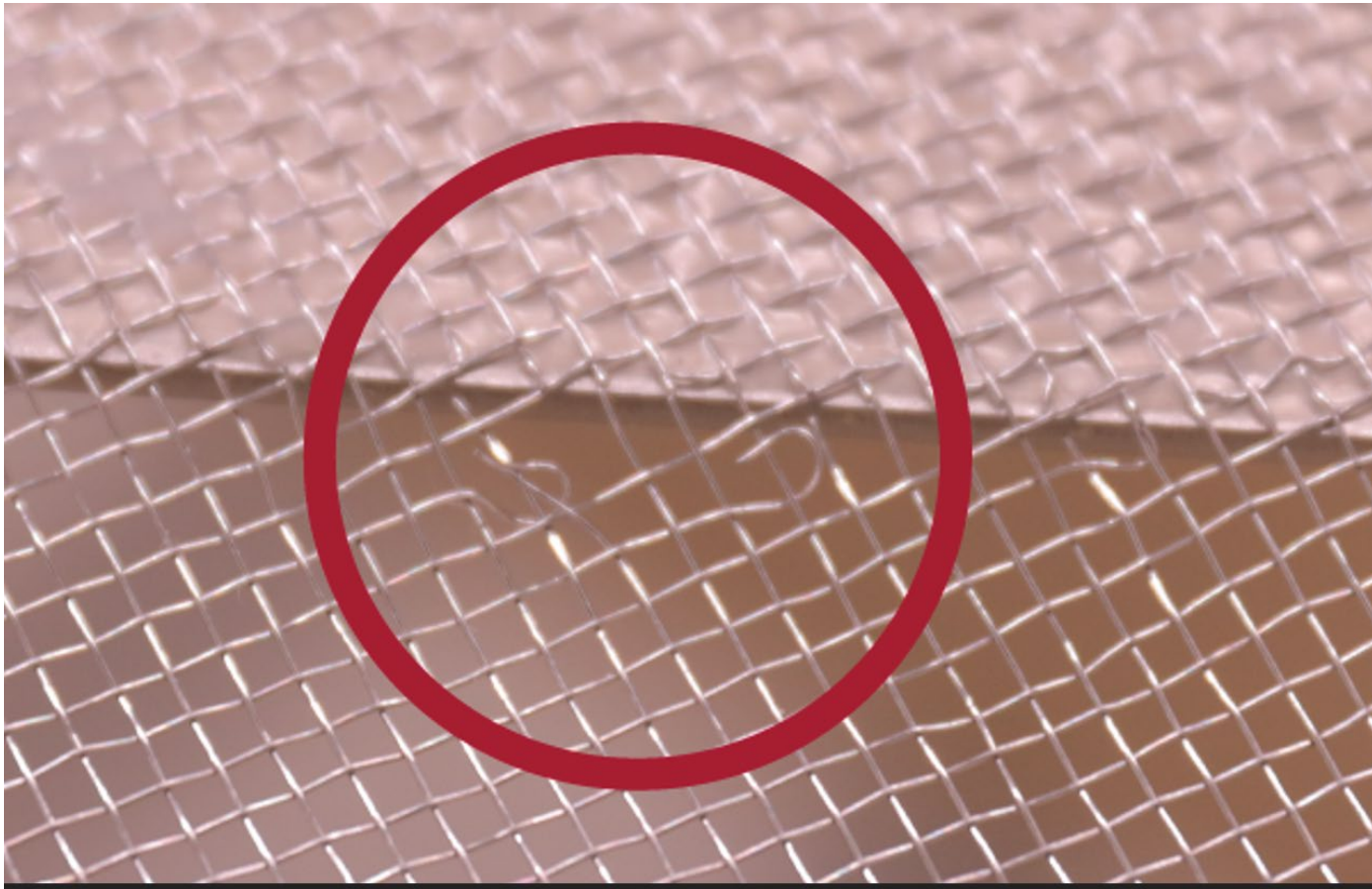
## Milling: Top 10 Serious & Unsat by Standard #



# Equipment and Utensils

- Sifter damage
- Peeling paint product zones

# Damaged Sifter Screens



# Pest Activity

- Birds
- Rodents

# Pest Activity



# Product Zone Cleaning

- Stored Product Pests
- Mold



# Stored Product Pests



# Overheads

- Condensation
- Flaking rust, coatings on covers



# Condensation



# Self Inspection

- GOAL!
- At least monthly
- “May” Clause....explain “Why”

# Self Inspections



# FDA Updates

# FDA Top 483's

Reference Number	Short Description	Long Description	Frequency
21 CFR 1.502(a)	Develop FSVP	You did not develop an FSVP. Specifically, ***	514
21 CFR 117.130(a)(1)	Hazard Analysis - Identification of Hazard	Your hazard analysis did not identify a known or reasonably foreseeable hazard that required a preventive control. Specifically, ***	104
21 CFR 117.35(c)	Pest Control	You did not [exclude pests from your food plant] [use pesticides under precautions and restrictions] to protect against contamination of food. Specifically, ***	98
21 CFR 117.80(c)	Manufacturing, Processing, Packing, Holding - Controls	You did not conduct operations under conditions and controls necessary to minimize the potential for [growth of microorganisms] [allergen cross-contact] [contamination of food] [deterioration of food]. Specifically, ***	95
21 CFR 117.10	Personnel	You did not take a reasonable measure and precaution related to personnel practices. Specifically, ***	87

# datadashboard.fda.gov

## FDA Data Dashboard

### Compliance Dashboards

[Inspections](#)

[Compliance Actions](#)

[Recalls](#)

[Imports Summary](#)

[Import Refusals](#)

[Imports Entry](#)

### FSMA Data Search

Find firm compliance and enforcement information.

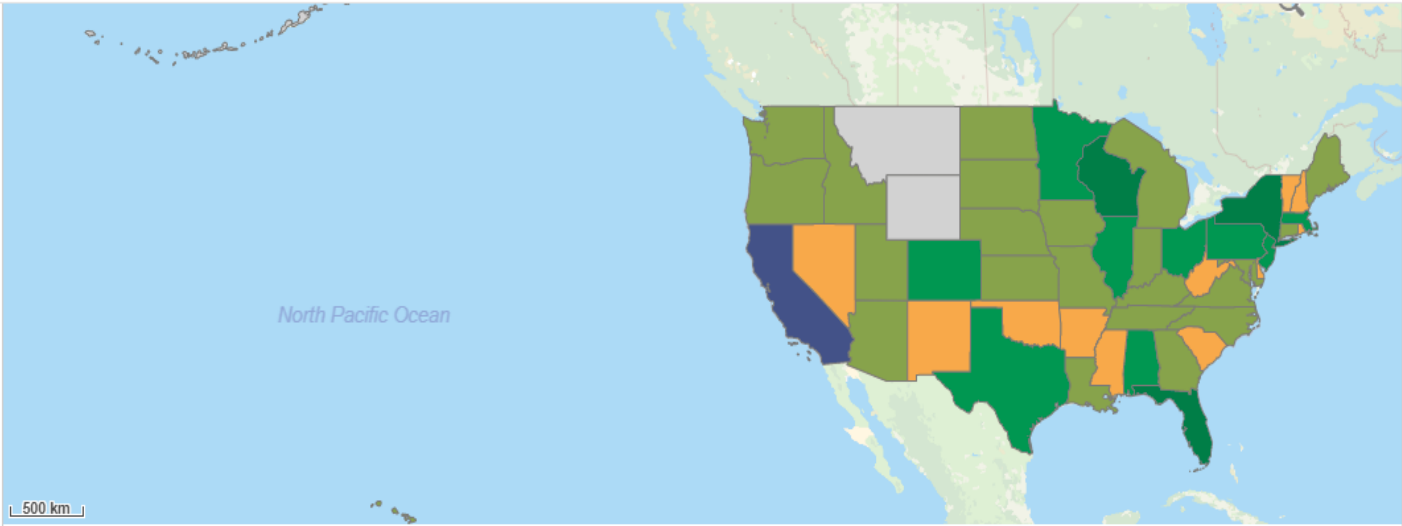
[Search Firm Information](#)

[Approved VQIP Importers](#)

[TPP Participants](#)

The FDA created the Data Dashboard to increase transparency and accountability by displaying and allowing the analysis of public FDA data through easy to use, visually accessible, customizable, and understandable graphics.





Points on the map represent the approximate location for the zip code associated with the firm(s) and not the actual location of the firm(s). Point map view is only available with selection of a single state.

Inspections Details [Help](#)

[Download Inspections Dataset](#)

Record Count: 1,678

Select Inspection ID(s) to view corresponding Inspections Citations.

FEI Number	Legal Name	City	State	Zip	Country/Area	Fiscal Year	Inspection ID	Posted Citations	Inspection End Date	Classification	Project Area	Product Type	FMD-145 Date
<a href="#">3010554425</a>	Skinner Produce Inc DBA Wyco Produce INC.	Tampa	Florida	33629	United States	2022	1162085	No	02/25/2022	No Action Indicated (NAI)	Foodborne Biological Hazards	Food/Cosmetics	-
<a href="#">3003972979</a>	Food Gusto, Inc.	Paterson	New Jersey	07513	United States	2022	1162859	No	02/22/2022	No Action Indicated (NAI)	Foodborne Biological Hazards	Food/Cosmetics	-
<a href="#">3001215005</a>	Owens & Minor	Houston	Texas	77043	United States	2022	1162984	No	02/22/2022	No Action Indicated	Foodborne	Food/Cosmetics	-

# Blueprint For Food Safety





Tech-enabled Traceability



Smarter Tools and Approaches for Prevention and Outbreak Response



New Business Models and Retail Modernization



Food Safety Culture



# Key Takeaways

- No management commitment - no food safety culture
- Establish food safety centric smart goals
- Educated employees lead to a true food safety culture
- Everyone can and should be involved
- **Explain “why”**



# Thank You!



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# Thank You!

