

# FSMA AND HACCP FOR OLIVE OIL PRODUCTION

AOOPA

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# WHAT CUSTOMERS CARE ABOUT

Price



Competitive and reasonable to afford

Health



How to use it to improve family health quality and feel good

Transparency



Know where their foods come from and traceability

Non GMO



Perception that this is healthier

Organic



Perception its better for you and the environment

Food Safety



Allergens and Adulteration

# EASY WAYS TO COMBAT

**Health**



Education in labels, website, hand outs, tastings, etc.

**Transparency**



Clear programs in place to be able to trace to the ranch

**Non GMO**



Education, Label it (*legally you have to*)

**Food Safety**



Comply with FSMA (*legally you have to*) consider a GFSI scheme (*it's the wave of the future*)

# HEALTH CLAIMS

- **Certified EVOO**
  - Applied Sensory
- FDA Health Claims
  - Heart healthy, fatty acids and polyphenols
- **Non GMO Project Verified**
  - Inherent but surprising amount of consumers inquire
  - Legally required to label per FDA law from 2016.
- **Gluten Free Certification**
  - Inherent but surprising amount of consumers inquire
- Kosher
  - East coast driven
  - Expensive but can
- Halal
  - East coast driven



# GFSI – GLOBAL FOOD SAFETY INITIATIVE

- Organization made up of retailers, regulators, and food chains
  - Examples schemes: BRC, SQF, IFS, etc.
  - “do what you say, say what you do”
  - FSMA on steroids. But FDA will not recognize as an alternative to FSMA
- Important Focus on
  - Document Control
  - HACCP
  - Training
  - Documentation....Documentation....Documentation

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## What is GFSI



The Global Food Safety Initiative (GFSI) brings together key actors of the food industry to collaboratively drive continuous improvement in food safety management systems around the world.

With a vision of *Safe food for consumers everywhere*, food industry leaders created GFSI in 2000 to find collaborative solutions to collective concerns, notably to reduce food safety risks, audit duplication and costs while building trust throughout the supply chain. The GFSI community works on a volunteer basis and is composed of the world's leading food safety

experts from retail, manufacturing and food service companies, as well as international organisations, governments, academia and service providers to the global food industry.

GFSI is powered by [The Consumer Goods Forum \(CGF\)](#), a global industry network working to support *Better Lives Through Better Business*.



# WHAT ARE THE FSMA RULES

## Required for Olive oil Production

Preventative Controls for Human Food	Yes NOW*
Labeling Updates	Yes- Nutrition Facts Edits Postponed July 2019
Preventative Controls for Animal Food	Yes- <u>IF</u> you sell anything (pomace, water, defective oil) to animal feed NOW*
Foreign Supplier Program	Yes- NOW importers of food. 2019 affects equipment and raw materials
Produce Safety Rule	No- because the olives go through further processing

\*depending on your size there are extensions leading into 2019, but everyone eventually is required no matter how big or small you are

# EXPECTATIONS

- **What the FDA is expecting**

- Allergen control and cross contamination
- Pesticide control
- Training
- Managerial responsibility to food safety
- Vendor approvals and management (all vendors)
- Expertise and analysis of your operation

- **What you should expect**

- Likely require more robust documentation from farming operations to the processing facilities to have supplier compliance.
- Unannounced inspections from the FDA in the next 5 years for processing facilities
  - Will be used as **educational** to help familiarize companies with new rules.
  - Focusing on high risk operations (kill step or high risk for foodborne illness)

# KEY DELIVERABLES FOR HUMAN FOOD AND ANIMAL FEED

- *Register with FDA- Bioterrorism*
- *Register with CDPH- Food Processing Facility (and Organic Food Processing Facility)*
- PCQI training (separate for Human and Animal)- 1 employee minimum
- Food Safety Program implementation
  - HACCP Plan
  - Procedures for all Preventative Controls
- GMP's

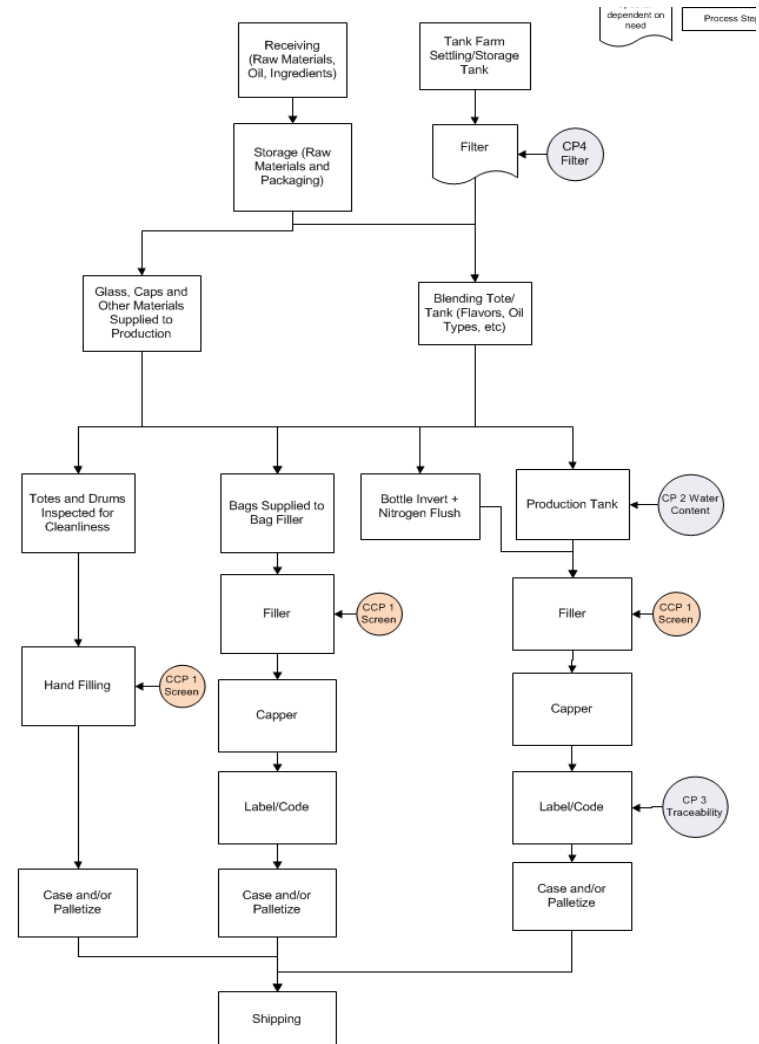


# PREVENTATIVE CONTROLS

- Good Manufacturing Practices requirements
- Preventative Controls relating to your HACCP Program
  - Process Controls- **CCPs**
  - Sanitation Controls
  - Allergen Control
  - Supply Chain
  - Food Safety Plans
    - Monitoring, Verification, Validation activities
    - Recall Plan
- Key is to have written policies to match what you do. They are adopting the SQF Motto- *Do what you say, Say what you do.*

# HACCP

- **Hazard Analysis Critical Control Points**
  - HACCP Team lead by your PCQI
  - Product Details (Description, Intended Use, Traceability, Storage Conditions, Significant Hazards by Category (Biological, Chemical, Physical))
  - Process Flow Chart (visual)
  - Risk assessment (Likelihood vs. severity)
  - Identifying Preventative Controls and CCP's
  - Monitoring, Verification, and corrective actions of CCP's
- If you have a CCP you must have Recall Plan



# FSMA LABEL CHANGES

- Removing Calories from Fat
- Dietary fiber and sugars define as added vs. naturally occurring
- Serving size real analysis of how it is normally used
- New daily value %
- Change in required vitamins to be listed
- Format changes for type font and locations
- Required Proof of your values

## Current Label

<b>Nutrition Facts</b>			
Serving Size 2/3 cup (55g)			
Servings Per Container About 8			
Amount Per Serving			
<b>Calories</b> 230	Calories from Fat 72		
		% Daily Value*	
<b>Total Fat</b> 8g			<b>12%</b>
Saturated Fat 1g			<b>5%</b>
Trans Fat 0g			
<b>Cholesterol</b> 0mg			<b>0%</b>
<b>Sodium</b> 160mg			<b>7%</b>
<b>Total Carbohydrate</b> 37g			<b>12%</b>
Dietary Fiber 4g			<b>16%</b>
Sugars 1g			
<b>Protein</b> 3g			
* Percent Daily Values are based on a 2,000 calorie diet. Your daily value may be higher or lower depending on your calorie needs.			
	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

## New Label

<b>Nutrition Facts</b>	
<b>1</b>	8 servings per container <b>Serving size 2/3 cup (55g)</b>
<b>2</b>	<b>Amount per serving</b> <b>Calories 230</b>
% Daily Value*	
<b>3</b>	<b>Total Fat 8g 10%</b> Saturated Fat 1g 5% Trans Fat 0g
	<b>Cholesterol 0mg 0%</b> <b>Sodium 160mg 7%</b> <b>Total Carbohydrate 37g 13%</b> Dietary Fiber 4g 14% Total Sugars 12g
<b>4</b>	Includes 10g Added Sugars <b>20%</b>
	<b>Protein 3g</b>
<b>5</b>	Vitamin D 2mcg 10% Calcium 260mg 20% Iron 8mg 45% Potassium 235mg 6%
<b>6</b>	* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

# USEFUL WEBSITES

- Laws, Regulations, FREE Trainings- CDPH in various regions of California
- Options for PCQI Training
  - <https://dfaofca.com/services/training-and-consulting/fsma-training-and-consulting/>
  - <https://www.scsglobalservices.com/fsma-preventive-controls-for-human-food-pchf-workshop>
- FSMA
  - <http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm247559.htm>
  - <http://www.regulations.gov/document?D=FDA-2011-N-0920-0001>
  - <http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm334115.htm>
  - <http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm257978.htm#GuidanceDockets>
  - <https://www.fda.gov/downloads/Food/GuidanceRegulation/FSMA/UCM472499.pdf>
- HACCP
  - <http://www.haccpalliance.org/sub/haccpmodels/guidebook.pdf>
  - <http://www.fda.gov/Food/GuidanceRegulation/HACCP/ucm2006801.htm>

THANK YOU!

