



Our Industry. Our Passion. Our Voice.

Safety: For the Employee, the Animal, the Consumer

Gary Huddleston – Director of Feed Manufacturing and Regulatory Affairs



VOICE



REPRESENTATION



EXPERTISE



ENGAGEMENT

Why should you have a safety program at your facility?

- **Concern for your employees**
- **Cost of work-related accidents**
- **Compliance to government regulations**



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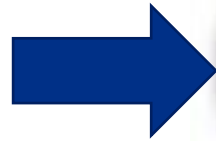


What should a safety program at a feed production facility look like?



- It should be written
- It should include documented job hazard analysis
- It should include employee training
- It should include a facility safety committee
- It should include accident/incident investigation
- It should include compliance to OSHA standards
- Your program should create a **SafetyCulture**

**Start
Here**



Regulations

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Applicable OSHA Standards



Walking Working Surfaces – Fall Protection

- 29 CFR 1910 Subpart D (1910.21-30)
- Ladders, stairways, fall protection systems



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Applicable OSHA Standards



Exit Routes and Emergency Planning

- 29 CFR 1910 Subpart E (1910.33-39)
- Emergency Action Plan (1910.38)
- Fire Prevention Plan (1910.39)



Applicable OSHA Standards



Powered Platforms, Manlifts

- 29 CFR 1910 Subpart F (1910.66-68)
- Manlifts (1910.68)



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Applicable OSHA Standards



Occupational Health and Environmental Control

- 29 CFR 1910 Subpart G (1910.94-98)
- Noise Exposure (1910.95)



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Applicable OSHA Standards



Hazardous Materials

- 29 CFR 1910 Subpart H (1910.101-126)
- Compressed Gasses (1910.101)
- Flammable Liquids (1910.106)
- Storage and Handling of LPG (1910.110)

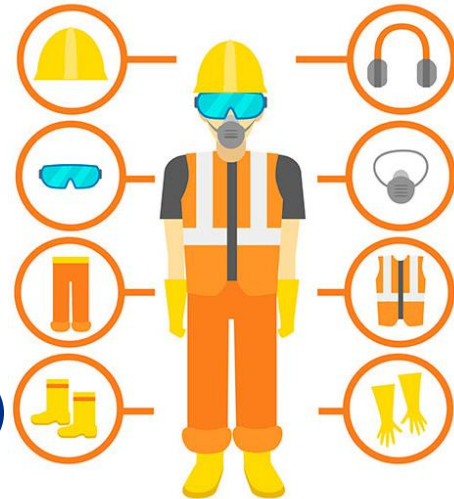




Applicable OSHA Standards

Personal Protective Equipment

- 29 CFR 1910 Subpart I (1910.132-140)
- Eye and Face Protection (1910.133)
- Respiratory Protection (1910.134)
- Head Protection (1910.135)
- Foot Protection (1910.136)
- Electrical Protective Equipment (1910.137)
- Hand Protection (1910.138)
- Personal Fall Protection Systems (1910.140)



Applicable OSHA Standards



General Environmental Controls

- 29 CFR 1910 Subpart J (1910.141-147)
- Permit-required Spaces (1910.146)
- Hazardous Energy – Lockout/Tagout (1910.147)



Applicable OSHA Standards



Fire Protection

- 29 CFR 1910 Subpart L (1910.155-165)
- Portable Fire Extinguishers (1910.157)
- Standpipe and Hose Systems (1910.158)
- Automatic Sprinkler Systems (1910.159)



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Applicable OSHA Standards



Materials Handling and Storage

- 29 CFR 1910 Subpart N (1910.176-184)
- Powered Industrial Trucks (1910.178)



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Applicable OSHA Standards



Machinery and Guarding

- 29 CFR 1910 Subpart O (1910.211-219)
- General Requirements for All Machines (1910.212)



Applicable OSHA Standards



Hand and Portable Powered Tools

- 29 CFR 1910 Subpart P (1910.241-244)



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Applicable OSHA Standards



Welding, Cutting and Brazing

- 29 CFR 1910 Subpart Q (1910.251-255)
- Hot Work permits and requirements (1910.252)



Applicable OSHA Standards



Special Industries

- 29 CFR 1910 Subpart R (1910.261-272)
- Grain Handling Facilities (1910.272)



Housekeeping Weekly Checklist

DATE: _____

ROOM	TASK	Sun	Mon	Tues
Room Name	Briefly describe the housekeeping task for this room. Use 2 lines. Necessary for the column.			
Room Number	If great checklist for personal or professional housekeeping address. For personal housekeepers or small subcontractor employees' tasks.			
Room	Any additional names or notes can be written by hand in the notes section.			
Room	Write the dates for the current week's tasks on the Dates line above.			
Room	This is an editable PDF file that allows you to edit or delete the text in the Room and Task columns only. (Adobe Reader recommended.)			
Room	The columns to the right are for checking off which days of the week the individual tasks were completed.			
Room	NOTE: Fonts and cell size cannot be changed.			
Room	Task			
Room	Task			
Room	Task			
Room	Task			

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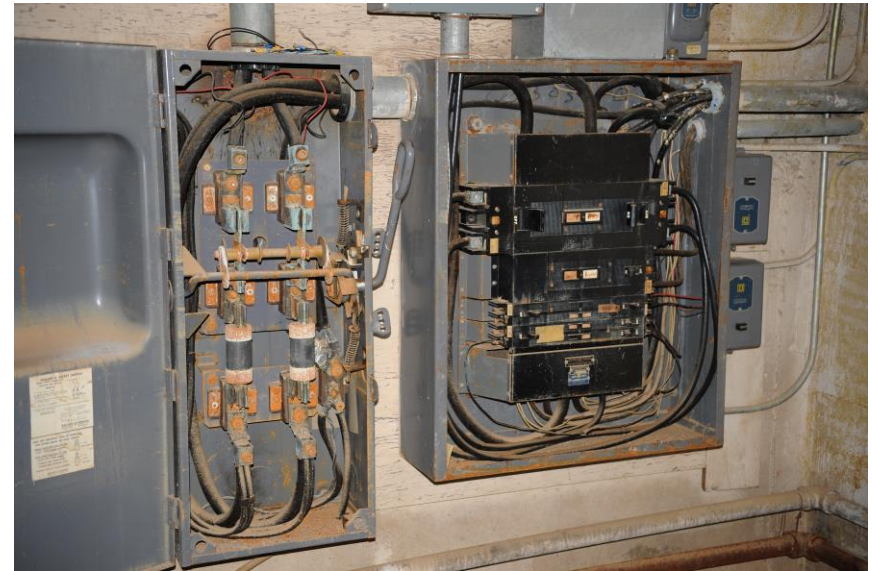


Applicable OSHA Standards



Electrical

- 29 CFR 1910 Subpart S (1910.301-399)



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Applicable OSHA Standards



Toxic and Hazardous Substances

- 29 CFR 1910 Subpart Z (1910.1000-1200)
- Hazard Communication (1910.1200)



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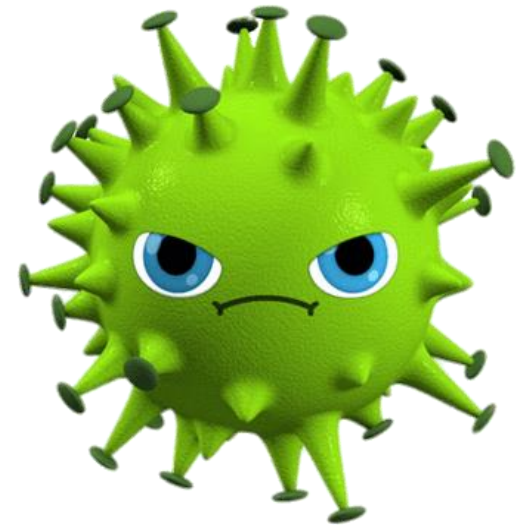


Applicable OSHA Standards



What about COVID-19?

- No ETS that applies to our industry
- OSHA issues regularly updated guidance
- Recent guidance recommends masks for all employees
- Workplace exposures have to be reported on OSHA 300



State Regulations...

NYS HERO ACT

On May 5, 2021, NY's Governor signed the New York Health and Essential Rights Act (NY HERO Act) into law. The law mandates extensive new workplace health and safety protections in response to the COVID-19 pandemic. The **purpose of the NY HERO Act is to protect employees against exposure and disease during a future airborne infectious disease outbreak.**

Key Dates and Elements:

August 5th a plan must be in place. Model Airborne Infectious Disease Exposure Prevention Plan, can be found at: <https://dol.ny.gov/ny-hero-act>

Plan must go into effect when an airborne infectious disease is designated by the New York State Commissioner of Health as a highly contagious communicable disease that presents a serious risk of harm to the public health. **Currently, while employers must adopt plans as required by the law, as of the date of this writing no designation has been made and plans are not required to be in effect.**



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What's on everyone's mind when it comes to FDA?

FSMA Snap Shot

Signed into law January 4, 2011

- **The current food safety system has opportunity for improvement.**
 - 1 in 6 Americans (48 million) sickened, 128,000 hospitalized, 3,000 die each year from foodborne diseases (CDC, 2011)
- **Identified by FDA as the most sweeping reform of food safety laws in more than 70 years.**
 - GOAL: Aims to ensure the U.S. food supply is safe by shifting the focus of federal regulators from responding to contamination to preventing it.

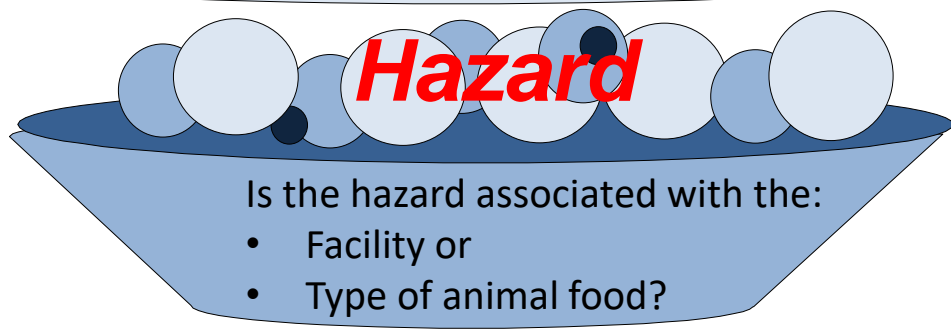
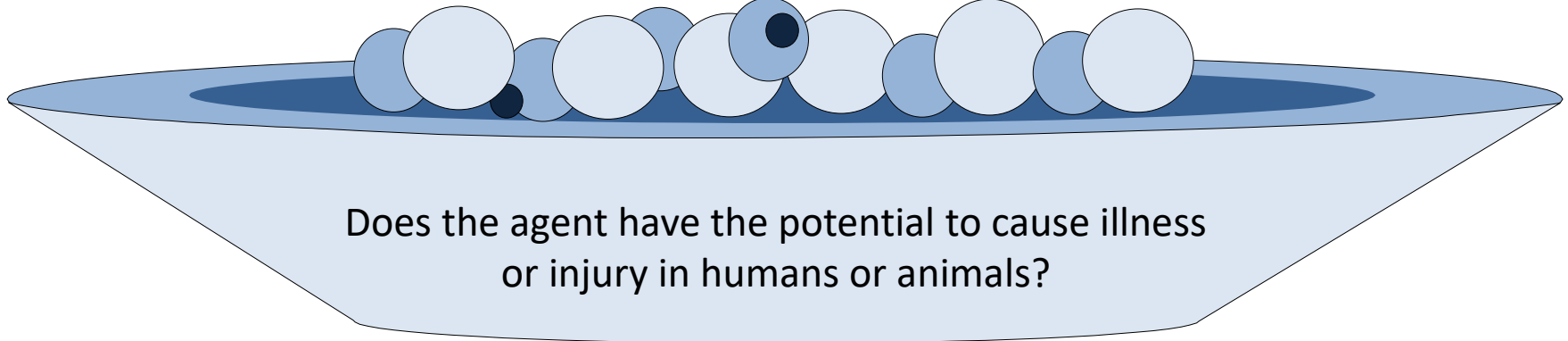
What Does FSMA Require?

- **Facilities that only hold animal food must (includes retail):**
 - Comply with CGMP requirements
 - Train Qualified Individuals
- **Facilities that manufacture, process or pack must also:**
 - Designate and train a Preventive Controls Qualified Individual (FSPCA Animal Food Course best method)
 - Conduct a Hazard Analysis
 - Develop a written Food Safety Plan to address the hazards identified

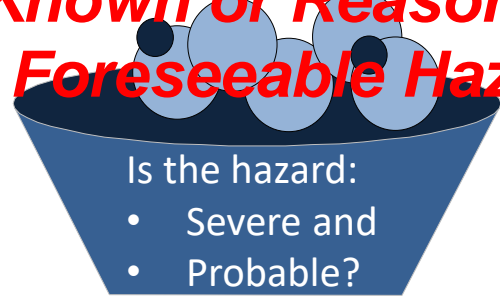
What is a FSMA Hazard Analysis?



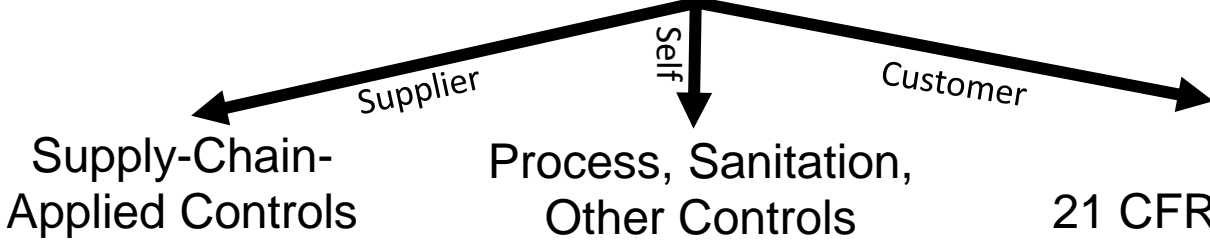
- **Varies by facility**
- **Consider ingredients and processes**
- **Identify hazards to animals as well as humans**
- **Most difficult part of FSMA compliance**



Known or Reasonably Foreseeable Hazard



Hazard Requiring a Preventive Control



Hazard Analysis Process

List Ingredients and Steps/Equipment within the Process Flow (recommended)



1

2



Identify *Known or Reasonably Foreseeable Hazards*

Assess Severity of Illness or Injury if Hazard were to Occur



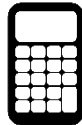
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4



Assess Probability that the Hazard will Occur in the Absence of Preventive Controls

Determine if the Hazard Requires a Preventive Control



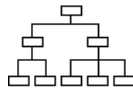
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6



Justify the Classification of the Hazard

Determine the Control for the *Hazard Requiring a Preventive Control*



7

8



Assign a Preventive Control Number (recommended)



Food Safety Plan

Required Documentation

All of this information should be assembled into a written Food Safety Plan

- The format is flexible
- Describes the facility's risk-based approach to managing the identified hazards

Applicable FDA FSMA Guidance for Industry



#235 Current Good Manufacturing Practice Requirements for Food for Animals

- No real surprises or enlightening interpretations
- Final document after comment period not bad
- Almost all of AFIA's suggestions were accepted
- Good explanation about the different types of facilities
- Does a good job highlighting flexibility of the rule
- Best part of the document is Appendix B – Self-Assessment Tool (Inspection Checklist)

Applicable FDA FSMA Guidance for Industry



#245 Hazard Analysis and Risk-Based Preventive Controls for Food for Animals

- This document is still in the draft stage (169 pages)
- AFIA submitted 36 pages of comments (lots of issues!)
- A lot of the language was devoted to hazards not relevant to most of the industry (pet vs livestock)
- Not enough qualifying language on the intended use of the animal food
- The list of hazards in Appendix E is concerning

Applicable FDA FSMA Guidance for Industry



#246 Hazard Analysis and Risk-Based Preventive Controls for Food for Animals: Supply-Chain Program

- This document is still in the draft stage (53 pages)
- It addresses Subpart E (not very relevant to animal food)
- Not nearly as many issues as GD #245
- AFIA submitted 8 pages of comments
- It's unlikely feed mills will have a supply-chain-applied control

Primary Types of FSMA Inspections

CGMP



Subpart B



HA/PC



Subparts C&E

- Sanitary Transportation
- FSVP



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Hopefully, it will end like this:



**But...
With poor preparation it could end
like this:**



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You want to avoid it ending like this:



CGMP Inspections: Frequent 483 Citations

Personnel

- Failed to enforce hygienic practices

Grounds & Maintenance

- Facility housekeeping and maintenance

Holding & Distribution

- Failed to hold under proper conditions

Records Requirements

- Failed to initial, sign off on or their records were inaccurate or illegible

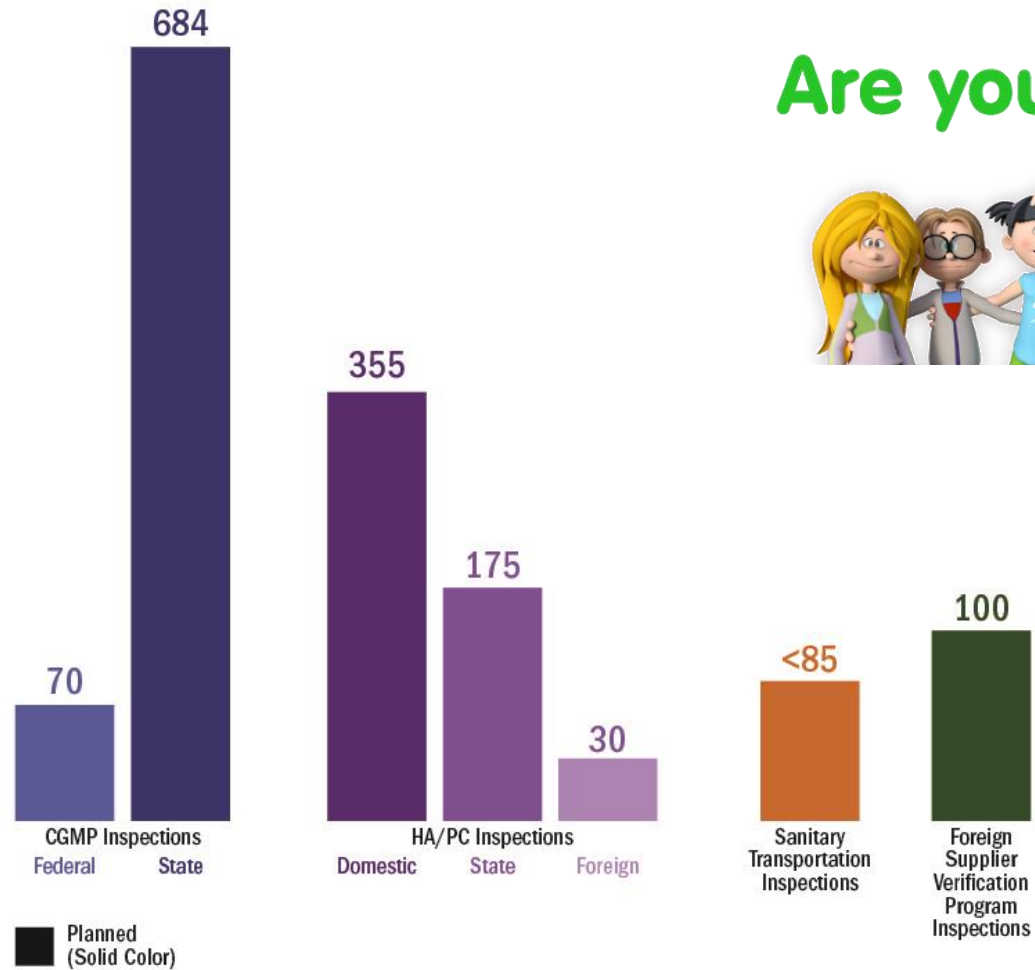
A few regarding...

- Utensils, pest control, handling rework

HA/PC Inspections: Frequent 483 Citations

- Not identifying the need for and implementing a PC
- Failed to have a **Food Safety Plan**
- Failed to evaluate all known or reasonably foreseeable hazards
- Process PC failed to minimize or prevent the hazard
- Effectiveness of PCs not effectively verified via product testing
- Sanitation PCs not effectively verified via environmental monitoring
- Failed to conduct **reanalysis** of FSP

FDA FY 2021 Inspection Goals



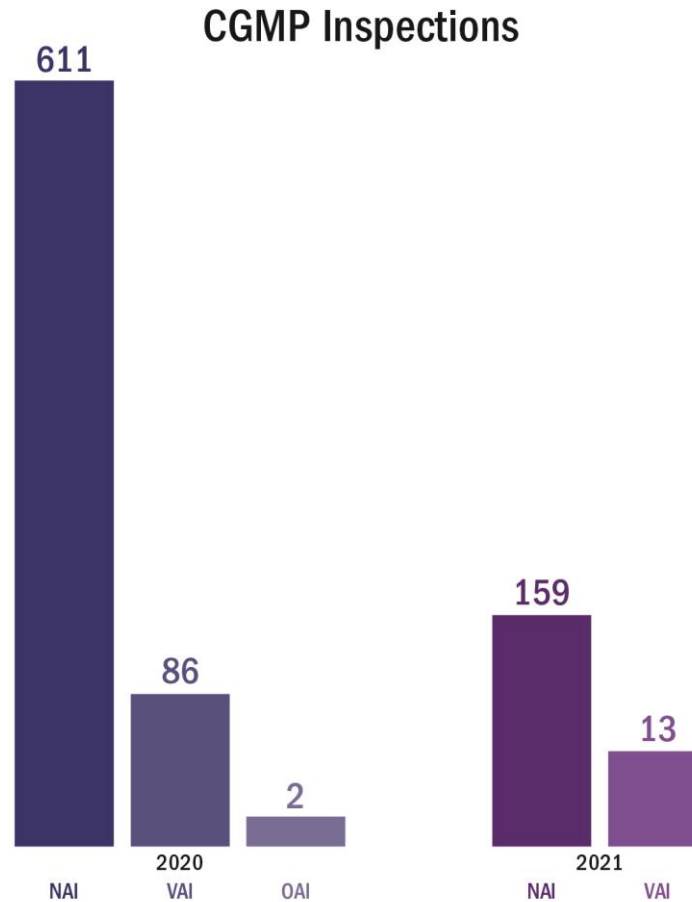
Are you ready?



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2020 and 2021 Inspections

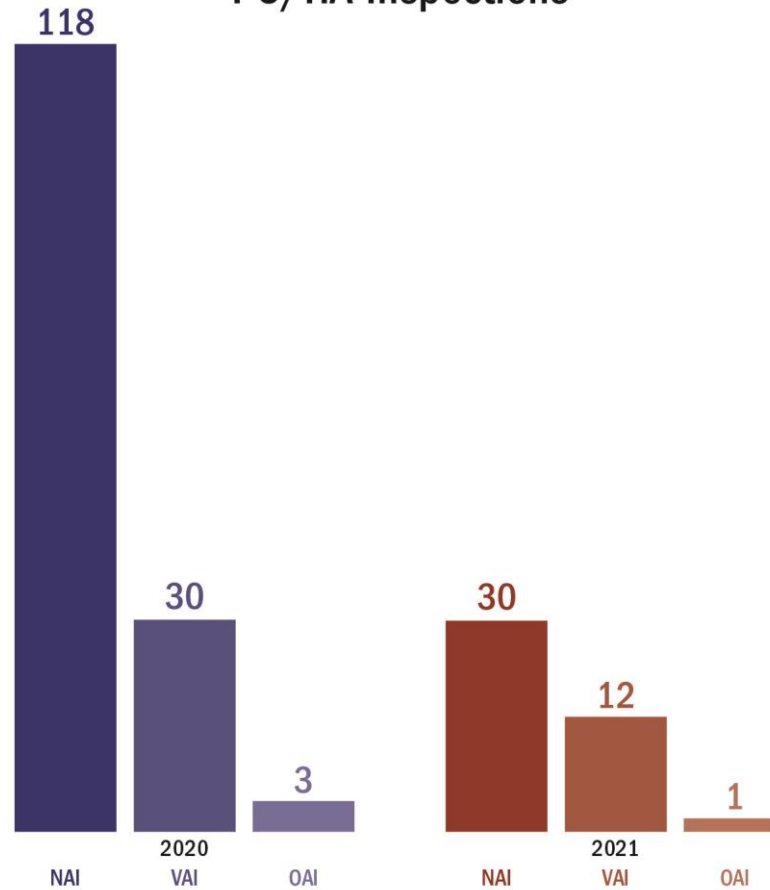


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2020 and 2021 Inspections

PC/HA Inspections

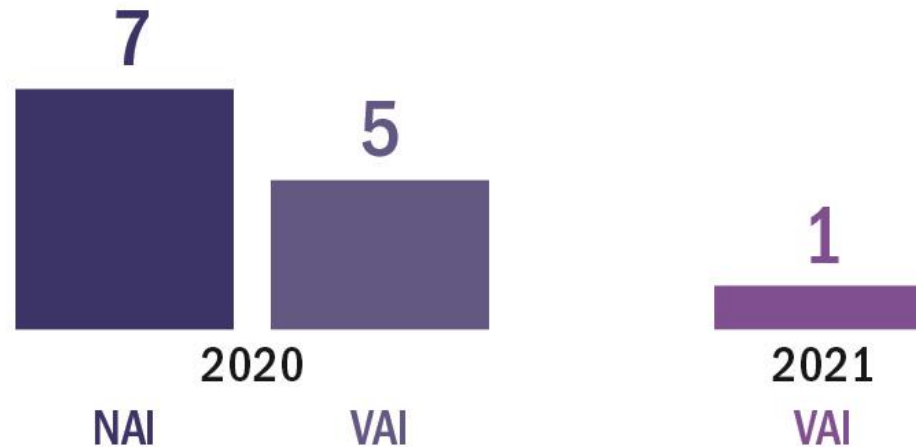


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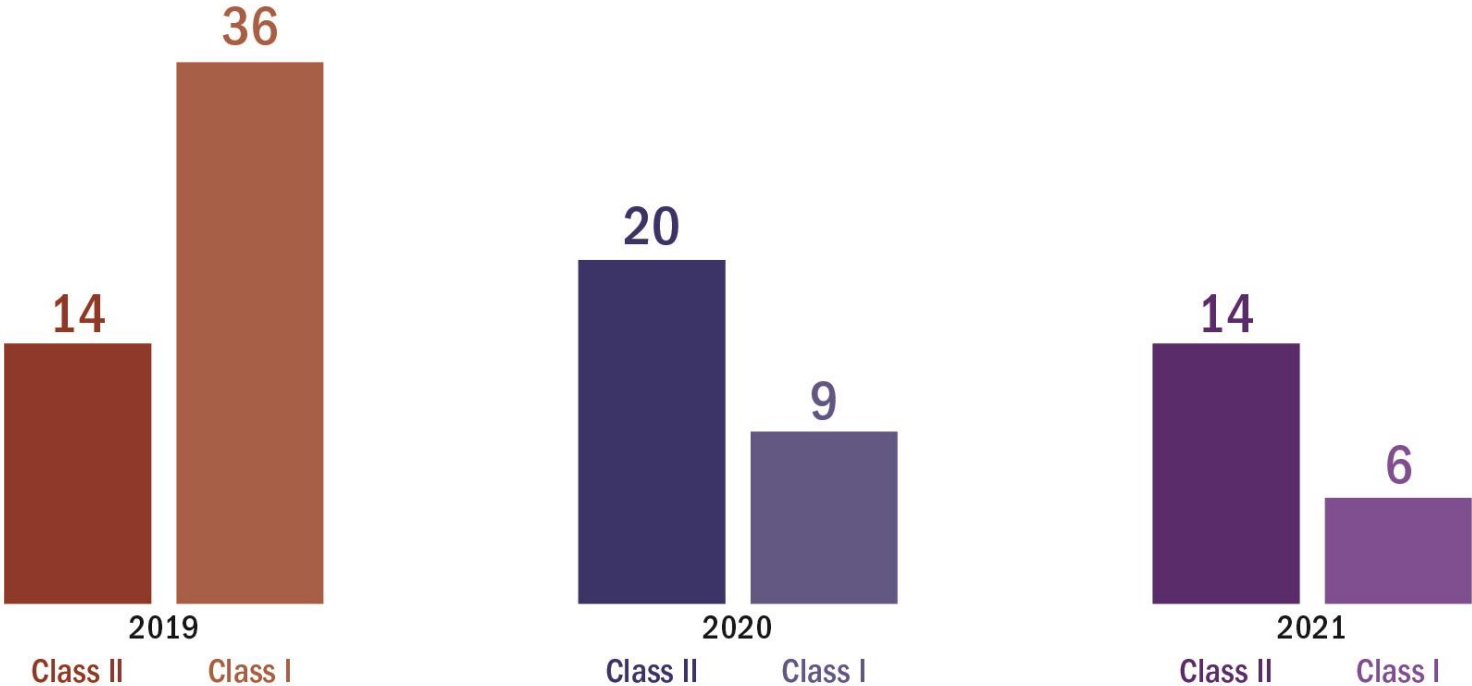
2020 and 2021 Inspections

FSVP Inspections



2019 - 2021 Recalls

Recalls



Inspections Beyond 2020?

- The new world of inspections
- What will it look like?
- Will the pandemic change the inspectional landscape permanently?



The best way to prepare for an inspection is to know the Regulations

- Attend a FSPCA PCQI Training
 - Ohio Agribusiness Association in Columbus, OH September 27-29: oaba.net/events.
 - See Barbara Simeon for other offerings



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Barbara Simeon Contact Information

Training Webpage

<https://fsma.cfd.coop/training/>

Cell Number 607-759-4175

Two Great AFIA Programs



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THANK YOU

AFIA'S 4 PROMISES



— VOICE —



— REPRESENTATION —



— EXPERTISE —



— ENGAGEMENT —

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