SAFE FEED/SAFE FOOD UPDATE

Review of FSC36 Safe Feed/Safe Food Audits

In March 2015, the FSC36 Safe Feed/Safe Food guidance document was updated to support compliance with the Food Safety Modernization Act final rules for animal food. In addition, the format of the audit was updated to follow the same concepts as Safe Quality Food Institute audits. The number of elements and sub-elements were reduced and audits were scored. By updating the format, the American Feed Industry Association is able to collect information from the audits to help drive continuous improvement within the guidance document and establish appropriate training.

AFIA was able to retrieve information from 315 on-site audits that were scored using the updated format for FSC36 Safe Feed/Safe Food audits. The assessment of the audits was based on the type of facility and audit rating. The following are key learnings from the audits:

- Approximately 90 percent of the audits were completed on AFIA member facilities. It is estimated there are more than 2,000 facilities among AFIA member companies.
- Half of the facilities were considered feed manufacturing facilities and half were supplier facilities. Dry feed and ingredient facilities accounted for 60 percent of the on-site audits between January 2015 and September 2016.
- The 315 audits were completed by 24 auditors. The average number of audits completed by an auditor was 13 with a range of 1 to 47 audits during this time period.
- The new format for FSC36 Safe Feed/Safe Food audits scored facilities based on the number of nonconformance findings. Audit ratings are Excellent (Score > 95), Good (Score 85-95), Complies (70-84) and Fails to Comply (Score < 70).
Based on the number of audits completed thus far, there should be approximately 25 percent more facilities audited in 2016 compared to 2015 by the end of the year. This is consistent with expectations as more facilities are seeking a third-party certification that supports FSMA compliance.

60 percent and 32 percent of the audit ratings were Excellent and Good, respectively.

Almost half of all audit scores were 98, 99 or 100 (27 percent = Score 100). There is concern that auditors are not holding facilities accountable to the FSC36 guidance document with scores too high, or the auditors do not have a full grasp of the requirements for FSMA requirements. A score of 100 implies the supplier is compliant with FSMA. This includes the implementation of Current Good Manufacturing Practice requirements, the development of a facility’s food safety plan and appropriate records for preventive controls, if any.

This is AFIA’s first opportunity to assess the new format of FSC36 Safe Feed/Safe Food audits and implementation of an effective quality and food safety program is a journey. The March 2015 changes to the FSC36 guidance document were implemented to help facilities drive continuous improvement. While a high score from an on-site audit is gratifying, AFIA encourages facilities to do a “self-assessment” on its accuracy. An on-site audit should be an affirmation of what’s already known with few surprises.

AFIA encourage you to work with your certification body to help your facility reach compliance with Safe Feed/Safe Food requirements, which supports FSMA compliance. AFIA is committed to work with auditors to help them do a better job auditing facilities for Safe Feed/Safe Food. The Quality and Animal Food Safety Committee is evaluating updates to the FSC36 guidance document for 2017.
Food Safety Certification Programs

Are you certified yet?

Contact AFIA
If you have additional questions about this information or about Safe Feed/Safe Food, please contact Henry Turlington, director of quality, education and training, at 703-650-0146, or Shakera Daley, accounting and administrative coordinator, at 703-558-3571.

Safe Feed/Safe Food Website

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AFIA | afia@afia.org | 2101 Wilson Boulevard
Suite 916
Arlington, VA 22201
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