



SAFE FEED/SAFE FOOD UPDATE

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Volume 17

Review of FSC36 Safe Feed/Safe Food Audits

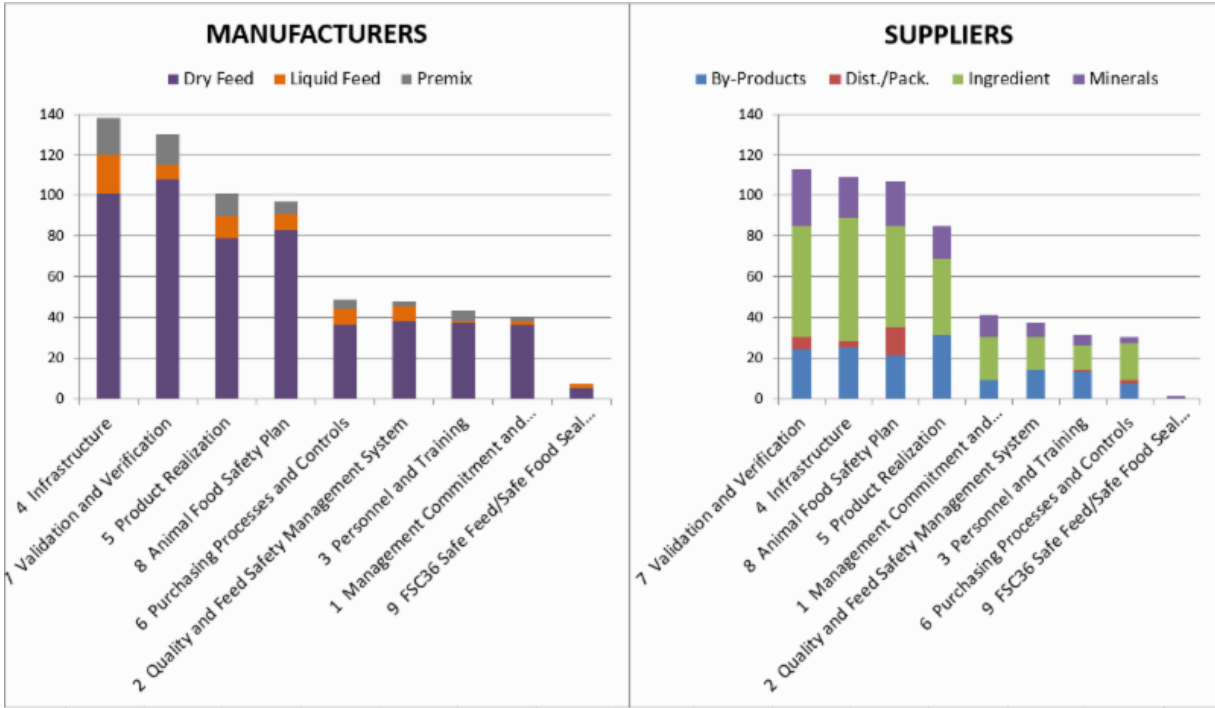
In March 2015, the American Feed Industry Association updated the FSC36 Safe Feed/Safe Food guidance document to support the compliance of the Food Safety Modernization Act and to format the audit process similar to FSC34 Manufacture of Animal Feeds and FSC32 Manufacture of Pet Food. Thus, audits were scored based on nonconformance findings reported.

With AFIA's alignment with the Safe Quality Food Institute, AFIA is able to capture information from FSC36 Safe Feed/Safe Food on-site audits in regards to nonconformance findings. The following are key learnings from 315 audits completed between January 2015 and September 2016:

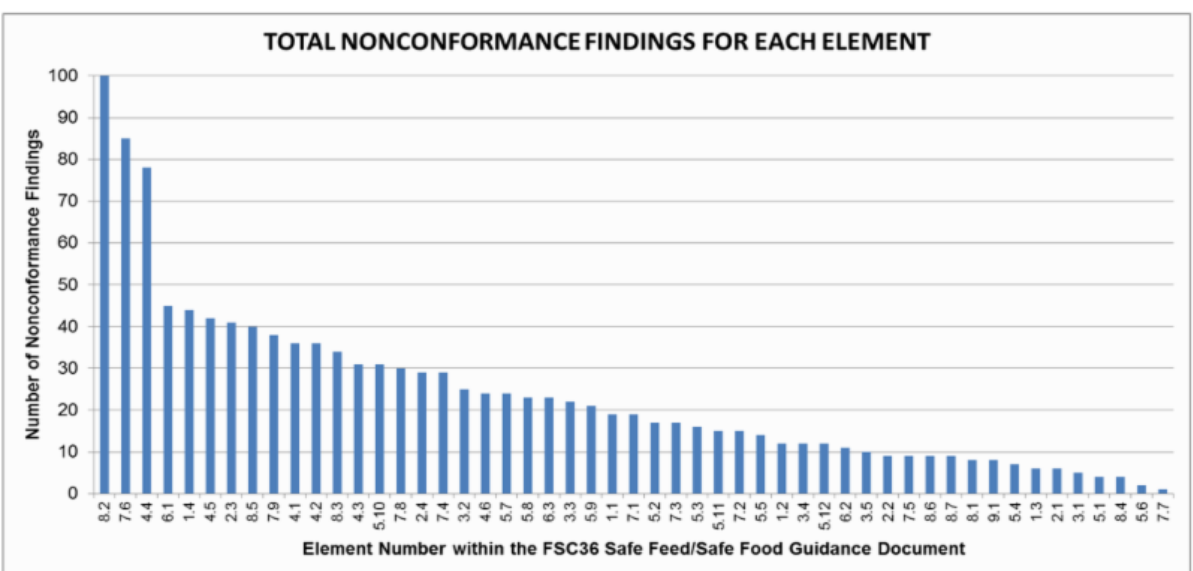
- There were 37 major and 1,170 minor nonconformance findings. Four sections (animal food safety plan, management commitment and responsibility, infrastructure, and validation and verification) accounted for most of the major nonconformance findings.
- More than 60 percent of the nonconformance findings were associated with implementation of Current Good Manufacturing Practices (CGMPs). The remaining nonconformance findings were associated with development of the animal food safety plan and documentation for preventive controls or records to ensure hazards are properly minimized or mitigated.
- The level of nonconformance findings was comparable across feed manufacturing facilities and supplier manufacturing facilities. Dry feed manufacturing and ingredient suppliers had the most nonconformance findings, which is expected, as these feed manufacturers represent a majority of the Safe Feed/Safe Food certified facilities.

REVIEW OF NONCONFORMANCE ACTIVITIES FROM FSC36 SAFE FEED/SAFE FOOD ON-SITE AUDITS	
NONCONFORMANCE TYPE	TOTAL
Major	
1 Management Commitment and Responsibility	6
2 Quality and Feed Safety Management System	1
4 Infrastructure	9
5 Product Realization	1
6 Purchasing Processes and Controls	1
7 Validation and Verification	6
8 Animal Food Safety Plan	13
Minor	
1 Management Commitment and Responsibility	75
2 Quality and Feed Safety Management System	84
3 Personnel and Training	74
4 Infrastructure	238
5 Product Realization	185
6 Purchasing Processes and Controls	78
7 Validation and Verification	237
8 Animal Food Safety Plan	191
9 FSC36 Safe Feed/Safe Food Seal Requirements	8
Grand Total	1207

*There were 315 on-site audits completed between January 2015 through September 2016 using the FSC36 Safe Feed/Safe Food Guidance Document v6.0-6.1.



- Four sections accounted for almost 75 percent of all nonconformance findings: four infrastructure, seven validation and verification, eight animal food safety plan, and five product realization.
- The section with the most nonconformance findings was section four, "Infrastructure," with 247 findings. The "top 10" elements or sub-elements with the most nonconformance findings accounted for more than 30 percent of the total findings. A combination of nonconformance findings for 2.3 Document Control and 2.4 Records was 70. A combination of nonconformance findings for each sub-element within 8.2 Animal Food Safety Plan equaled 100 findings, which was the area for the most nonconformance findings. Clauses 7.6 Internal Audits and 4.4 Pest Control followed with 85 and 78 findings, respectively.



A review of the nonconformance findings across all FSC36 Safe Feed/Safe Food on-site audits helps us identify the areas where certified facilities need help with education and training. Based on the information above, facilities need support with implementing CGMPs and developing a complete animal food safety plan that supports FSMA compliance.

Food Safety Certification Programs

Are you certified yet?



Contact AFIA

For technical assistance, please contact [Henry Turlington](#) at (703) 650-0146. For administrative assistance, please contact [Shakera Daley](#), AFIA accounting and administrative coordinator, at (703) 558-3571.

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