New FSC36 Safe Feed/Safe Food Guidance Document (Part 1)

Safe Feed/Safe Food was launched in 2004 with the first facilities obtaining certification the following year. Since the beginning of the Safe Feed/Safe Food program, the number of certifications has expanded to four options. FSC36 Safe Feed/Safe Food is the most popular certification and is considered the core offering of the program.

The American Feed Industry Association has updated the requirements of FSC36 Safe Feed/Safe Food with the intent of the certification to support the new requirements outlined in the Food Safety Modernization Act as well as help drive continuous improvement within a location's quality and feed safety program. The updated requirements are listed as the FSC36 Safe Feed/Safe Food guidance document on the Safe Feed/Safe Food website.

The requirements for FSC36 Safe Feed/Safe Food certification include Current Good Manufacturing Practices for animal feed production as well as the requirements for an effective animal food safety program. The requirements for FSC36 Safe Feed/Safe Food support a risk-based management system that is documented and implemented by a facility (supplier) of feed or feed-related products to control animal food safety.

Feed and feed materials intended for consumption by animals must be produced, processed and handled in a safe and efficient manner. In order to accomplish this, feed processing premises shall be designed to facilitate proper processing, handling and storage of product. The guidance document for FSC36 Safe Feed/Safe Food provides an outline for the guidance on each aspect of the manufacturing process to assist in understanding various requirements. It also details some of the fundamental practices that must be in place to protect the safety and quality of feed.

What is FSC 36 Safe Feed/Safe Food? When AFIA aligned with the Safe Quality Food Institute, each Safe Feed/Safe Food certification was assigned a Food Sector Code (FSC) number within the SQF database. FSC32 was assigned to AFIA's Pet Food Certification program. FSC34 was assigned to the new GFSI benchmarked program for animal feed. FSC36 was assigned to AFIA's existing Safe Feed/Safe Food certification for animal feed.
Why update the FSC 36 Safe Feed/Safe Food guidance document? AFIA maintains sole control of the requirements for FSC36 Safe Feed/Safe Food whereas SQFI provides the food safety fundamentals for FSC32 and FSC34 programs. When we transitioned to SQFI, the requirements for the FSC36 program were raised and the processes for completing certification were changed. These changes proved burdensome for previously certified facilities. The AFIA Quality Committee embraced the problem and updated the requirements and process to obtain FSC36 Safe Feed/Safe Food certification. In addition, the scope of the program was broadened to support compliance with the new FSMA requirements.

What are the major changes to the FSC36 Safe Feed/Safe Food guidance document? There have been minimal changes to the requirements to obtain FSC36 Safe Feed/Safe Food. However, the process for completing the certification has been streamlined to create a more user-friendly program.

- The number of elements has been reduced from 230-plus elements to 77 elements. This should allow the auditors to spend more time reviewing documentation and the manufacturing processes.

- FSC36 is being changed to a "Continuous Improvement" program from a "Compliant" program. In the past, facilities had to comply with each element in order to obtain certification. The new process will allow the auditor to assess the effort and progress by a facility to comply with the FSC36 Safe Feed/Safe Food guidance document. The facility will be scored based on these efforts. The assessment process will provide the facility with better direction for continuous improvement and compliance with FSMA. The continuous improvement process is consistent with the FSC32 and FSC34 programs. This also allows us to take advantage of the SQFI tools more effectively.

- The "self-audit" is being replaced by a "surveillance audit" (or remote audit) that will be completed by the certifying body (CB). The surveillance audit is an abbreviated version of the on-site audit and covers "mandatory" elements only (see section 2.4 System Elements of the guidance document for a listing of the mandatory elements). The facility will work with the CB to ensure compliance with these elements without completing an on-site audit. This is also referred to as a desk audit. There will be a cost associated with the surveillance audit ($300-$400), but the process and the quality of the audit will be greatly improved as the CB is more involved with the assessment and the facility provides supporting evidence only. An on-site audit will continue to be completed every two years.

What is the purpose of the guidance document? The purpose of the guidance document for FSC36 Safe Feed/Safe Food is to 1) assist facilities with designing, developing, implementing and maintaining a quality and feed safety program that complies with the desired requirements and 2) assist auditors with auditing locations seeking certification for FSC36 Safe Feed/Safe Food. There are numerous examples provided within the guidance document to assist facilities with preparation
for compliance with the requirements. However, it is not a definitive document and applicable in every situation. Suppliers, consultants and auditors are required to understand animal food safety risks (and quality, where applicable) in the feed industry in order to effectively control those risks.

The new FSC36 Safe Feed/Safe Food guidance document includes the following:

- Registration and certification process
- Implementation process
- Introduction to the guidance document
- Guidance document for FSC36 Safe Feed/Safe Food
- Glossary
- Logo use

The next issue of the SAFE FEED/SAFE FOOD UPDATE will cover more details about the new Safe Feed/Safe Food guidance document.

Food Safety Certification Programs
Which program is right for me?

Which certification is right for me? AFIA offers four certification options for quality and food safety programs. The right one for you depends upon your business and your target customers. A brief description of the certification options is provided in the chart below.

Safe Feed/Safe Food Certifications

- **International Safe Feed/Safe Food**
  - Internationally recognized program that aligns with FAMI-QS
  - Designed for feed additives and premixes

- **FSC32 Manufacture of Pet Food**
  - GFSI recognized program that meet FSMA regulatory requirements
  - Designed for pet food manufacturers or ingredient suppliers

- **FSC34 Manufacture of Animal Feeds**
  - GFSI recognized program that meet FSMA regulatory requirements
  - Designed for feed manufacturers and ingredient suppliers

- **FSC36 Safe Feed/Safe Food**
  - Fundamentals for compliance with FSMA
  - Designed for North American feed manufacturers
An update in the guidance document describing the requirements for FSC36 Safe Feed/Safe Food certification is now available on the Safe Feed/Safe Food website (learn more in future newsletters). The goal of the updates is to provide a certification that meets the regulatory requirements for FSMA as well as drive continuous improvement within the facility’s quality and food safety program.

AFIA is dedicated to driving continuous improvement in the delivery of a safe and wholesome feed supply for the growth and care of animals. AFIA maintains its commitment to help its members and the total feed industry to develop quality and food safety programs to meet and exceed the expectations of its customers.

Contact AFIA
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