



## SAFE FEED/SAFE FOOD UPDATE

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### Revisions to FSC36 Safe Feed/Safe Food Guidance Document

In March 2015, the American Feed Industry Association updated the FSC36 Safe Feed/Safe Food guidance document to support 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. The final FSMA rule for animal food was published in September 2015, and businesses are busy preparing for compliance. With the rule now in place, AFIA plans to update the FSC36 Safe Feed/Safe Food guidance document to ensure the requirements for the certification supports the compliance of FSMA.

The good news is, the requirements for FSC36 Safe Feed/Safe Food are not changing. However, the expectations relative to FSMA compliance are more clear. The following are key updates planned for the FSC36 Safe Feed/Safe Food guidance document:

1. More direct references to the FSMA animal food rule requirements have been added.
  - After comparing the FSMA animal food rule to the FSC36 guidance document, there seemed to be several gaps. For example, the requirements for Current Good Manufacturing Practices (CGMP) (subpart B of the animal food rule) were not specifically identified, although the expectations were generally called out within the various requirements. A clause will be added for each CGMP requirement to ensure suppliers incorporate steps, processes or procedures to comply with these FSMA requirements.
  - More text from the animal food rule will be incorporated into the guidance document to help ensure FSMA compliance. The requirements for records (subpart F of the animal food rule) will be incorporated into clause 2.3 Records. In addition, FSMA requirements for the food safety plan and preventive controls will be added to the guidance document.
2. "Auditing Guidance" was removed while "Implementation Guidance" was maintained.
  - Within version 6.1, implementation guidance and auditing guidance are provided for each clause. Within version 7.0, the auditing guidance will be removed because this has been a point of confusion for auditors, as well as facilities seeking certification. Many auditors and auditees have interpreted this information as the only items that are relevant to the audit while the intent was to provide a minimum expectation for compliance. This has led to several nonconformance activities not being reported by auditors or ignored by the suppliers.
  - Auditing guidance will be an individual/stand-alone document. This allows changes or additions as needed to help auditors maintain consistency and improve the quality of audits. This document is being developed and will be launched at a later date.
3. Reference to clauses has been updated.
  - In version 6.0, there were sections with the same number within the document. As an example, Section 2.3 = "Auditing Duration Guide" while within the scheme requirements 2.3 = "Document Control (M)". Many companies were confused and questioned the requirements for certification. To help alleviate the confusion, "SF/SF" will be added in

front of each clause for Safe Feed/Safe Food requirements. Within the text of the document "Safe Feed/Safe Food" is not abbreviated as "SF/SF" to avoid confusion as to the meaning of the acronym. Many people ask whether it is "Safe Food/Safe Feed" or "Safe Feed/Safe Food."

Version 7.0 will be posted on the [Safe Feed/Safe Food website](#) by April 2017 for review by individuals interested in the changes. The updates will go into effect and be incorporated into audits beginning June 1.

At some time in the future, AFIA will hold an education and training conference called the AFIA Animal Food Safety Summit. The agenda for the conference is being developed by the AFIA Quality & Animal Food Safety Committee and will be available soon. The intent is to provide educational sessions to help facilities comply with Safe Feed/Safe Food certification.

## Food Safety Certification Programs

*Are you certified yet?*



### Contact AFIA

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