



SAFE FEED/SAFE FOOD UPDATE

May 1, 2017

Volume 19

FSC36 Safe Feed/Safe Food Guidance Document version 7.0 posted to Safe Feed/ Safe Food Website for review

The Quality and Food Safety Committee of the American Feed Industry Association has updated the FSC36 Safe Feed/Safe Food guidance document to ensure the requirements for the certification supports the compliance of FSMA. The new guidance document is now available on the [Safe Feed/Safe Food website](#) for review until May 31, 2017. The updates will go into effect and be incorporated into audits beginning June 1. Firms should begin collecting this information on that date using the new requirements.

The following are key updates made within the FSC36 Safe Feed/Safe Food guidance document version 7.0:

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 was 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 was incorporated into the guidance document to help ensure FSMA compliance. The requirements for records (subpart F of the animal food rule) were incorporated into clause 2.3 Records. In addition, FSMA requirements for the food safety plan and preventive controls were 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 was removed because this has been a point of confusion for auditors, as well as facilities seeking certification. Many auditors and facilities 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 have 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" was 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." It's the latter, as safe feed makes safe food.

Food Safety Certification Programs

Are you certified yet?



Contact AFIA

For technical assistance, please contact [Gary Huddleston](#), AFIA director of manufacturing and regulatory affairs, at (703) 666-8854. For administrative assistance, please contact [Shakera Daley](#), AFIA accounting and administrative coordinator, at (703) 558-3571.

[Safe Feed/Safe Food Website](#)

Stay Connected

#SafeFeedSafeFood | www.afia.org



AFIA | 2101 Wilson Boulevard, Suite 916, Arlington, VA 22201
Copyright © 2016. All Rights Reserved.