



A Systems-Based Approach to Regulatory Food Safety Inspections

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Agenda

Systems thinking

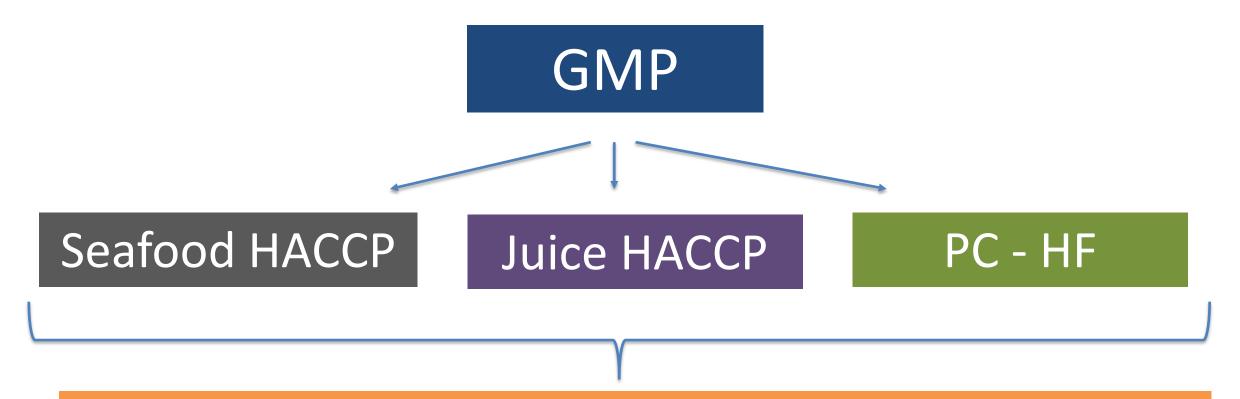
Systems-based inspections

Background

1969 - GMPs 1973 - LACF 1979 – Acidified Foods 1995 - Seafood HACCP **2022 – Juice HACCP** 2011 - FSMA • 2015 - Preventive Controls for Human Food

Interplay of Food Regulations





LACF, Acidified, Sanitary Transport, Intentional Adulteration, etc.



Systems Thinking

What is it?

Why are we talking about it now?

Food Facility
Inspections

How is it applied during an inspection



Systems Thinking Habits

Are you a systems thinker?

- Looking at the big picture
- Recognizing interdependencies
- Making connections
- Considering assumptions and Internal Representations
- Assessing from many perspectives
- Seeing issues fully



Systems Based Inspections

What is the objective?

Principles of a Systems-based Food Safety Regulatory Program

- Build trust and accountability
- Promote open communication
- Use tools to achieve compliance
 - Voluntary corrective action
- Accomplish a common goal safe food
 - Educate before and during inspection
- Be flexible
- Regulatory strategy based on public health

Inspection Process









- Initial Interview
- Walk through develop flow narrative
- Interview and observe
 - Receiving
 - Processing
 - Storage
 - Distribution
- Write and/or discuss observations
 - Based on regulatory significance

Systems-based Inspection Approach

Documenting Observations

Observations based on public health rather than regulatory requirements

Significant observations – documented

Non-significant observations – discussed

Tracking voluntary corrective actions

