

Training: An Industry Perspective

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Introduction

- Training Requirements
- Training Records
- Competency Evaluations
- Training Resources Available
- Challenges for Remote Sites
- Food Safety Culture
- Practical Tips



Food Safety Training Requirements

General Training Requirements

- 21 CFR 117.4 – CGMPs - Qualifications of individuals who manufacture, process, pack, or hold food
- 21 CFR 117.305 – CGMPs - General Requirements applying to Records
- 18 AAC 34.803 Seafood Processing Regulations - Qualifications and Training

HACCP Training Requirements

- 21 CFR 123.10 - Fish and Fishery Products – Training*

FSMA Food Defense

- Independent Third-Party Standards
 - GFSI (BRCGS, SQF, ISO)
 - Sustainability Standards (MSC, RFM)

TITLE 21--FOOD AND DRUGS
CHAPTER I--FOOD AND DRUG ADMINISTRATION
DEPARTMENT OF HEALTH AND HUMAN SERVICES
SUBCHAPTER B - FOOD FOR HUMAN CONSUMPTION

PART 117 CURRENT GOOD MANUFACTURING PRACTICE, HAZARD ANALYSIS, AND RISK-BASED PREVENTIVE CONTROLS FOR HUMAN FOOD

Subpart A - General Provisions

[§ 117.1](#) - Applicability and status.

[§ 117.3](#) - Definitions.

[§ 117.4](#) - Qualifications of individuals who manufacture, process, pack, or hold food.

[§ 117.5](#) - Exemptions.

[§ 117.7](#) - Applicability of subparts C, D, and G of this part to a facility solely engaged in the storage of unexposed packaged food.

[§ 117.8](#) - Applicability of subpart B of this part to the off-farm packing and holding of raw agricultural commodities.

[§ 117.9](#) - Records required for this subpart.

Subpart B - Current Good Manufacturing Practice

[§ 117.10](#) - Personnel.

[§ 117.20](#) - Plant and grounds.

[§ 117.35](#) - Sanitary operations.

[§ 117.37](#) - Sanitary facilities and controls.

[§ 117.40](#) - Equipment and utensils.

[§ 117.80](#) - Processes and controls.

[§ 117.93](#) - Warehousing and distribution.

[§ 117.95](#) - Holding and distribution of human food by-products for use as animal food.

[§ 117.110](#) - Defect action levels.

Subpart C - Hazard Analysis and Risk-Based Preventive Controls

[§ 117.126](#) - Food safety plan.

[§ 117.130](#) - Hazard analysis.

[§ 117.135](#) - Preventive controls.

[§ 117.136](#) - Circumstances in which the owner, operator, or agent in charge of a manufacturing/processing facility is not required to implement a preventive control.

[§ 117.137](#) - Provision of assurances required under 117.136(a)(2), (3), and (4).

[§ 117.139](#) - Recall plan.

[§ 117.140](#) - Preventive control management components.

[§ 117.145](#) - Monitoring.

[§ 117.150](#) - Corrective actions and corrections.

[§ 117.155](#) - Verification.

[§ 117.160](#) - Validation.

[§ 117.165](#) - Verification of implementation and effectiveness.

[§ 117.170](#) - Reanalysis.

[§ 117.180](#) - Requirements applicable to a preventive controls qualified individual and a qualified auditor.

[§ 117.190](#) - Implementation records required for this subpart.

Subpart D - Modified Requirements

Different Types of Training

- Food Safety Training - For everyone who manufactures, processes, packs or holds food

- Examples:

- SSOPs/GMPs
- Health and Hygiene Policy
- Food Defense*



- Job Specific Training – Will vary depending on Job Responsibilities

- Examples:

- Machine Operator
- Grading
- Clean Up Crew
- QC Tech
- HACCP Team





Training Records

In-House training:

- Identity of plant or facility
- Date and Time (include duration)
- Signature or initials (instructor and participants)
- Description of training covered (Include details, especially is not using curriculum)

Third-Party Training:

- Request the record/certificates and maintain on file

Example Training Record

Hazard Analysis and Critical Control Point Training Curriculum 6th Edition, June 2020, page 13

Group Employee Training Record	
Course: Personnel Hygiene and Food Safety Level 1	Location: <i>Headquarters</i>
DATE COMPLETED: April 15, 2017	SIGNED <i>Ben Smith, Supv. No. 1</i>
EMPLOYEES	
<i>Nancy Dolittle - Packing and Labeling</i>	
<i>Anyone Jones - Shrimp cooker belt</i>	
<i>Wei Not - Recv Dock</i>	
<i>Bettie Done - Thawing</i>	

Competency Evaluations

Verification that training was adequate, and employees are able to do the jobs for which they were trained.

- Include discussion questions as part of training
- Written Tests
- On-the-job observation
 - SSOPs and GMPs monitoring
 - QC checks (grading, labeling, weighing)
 - Internal Audits
 - Supervisor observation

Example Supervisor Competency Evaluation

Group Employee Training Record					
Course: Personnel Hygiene and Food Safety Level 1		Location: <i>Headquarters</i>			
DATE COMPLETED: April 15, 2017		SIGNED <i>Ben Smith, Supv. No.</i>			
EMPLOYEES		Competency Evaluation			
		Date	Time	Result	Supervisor
<i>Nancy Dolittle - Packing and Labeling</i>					
<i>Anyone Jones - Shrimp cooker belt</i>					
<i>Wei Not - Recv Dock</i>					
<i>Bettie Done - Thawing</i>					



Types of Training and Resources Available

- Training Curriculums
- Hands-On Training
- Supplier Training Sessions
- FDA Website
- Workshops/Webinars
- YouTube
- Seagrant Programs & Academic Websites
- HACCP and SCP Classes (AFDO/SHA)
- 3rd Party Training (Auditing/Consulting)

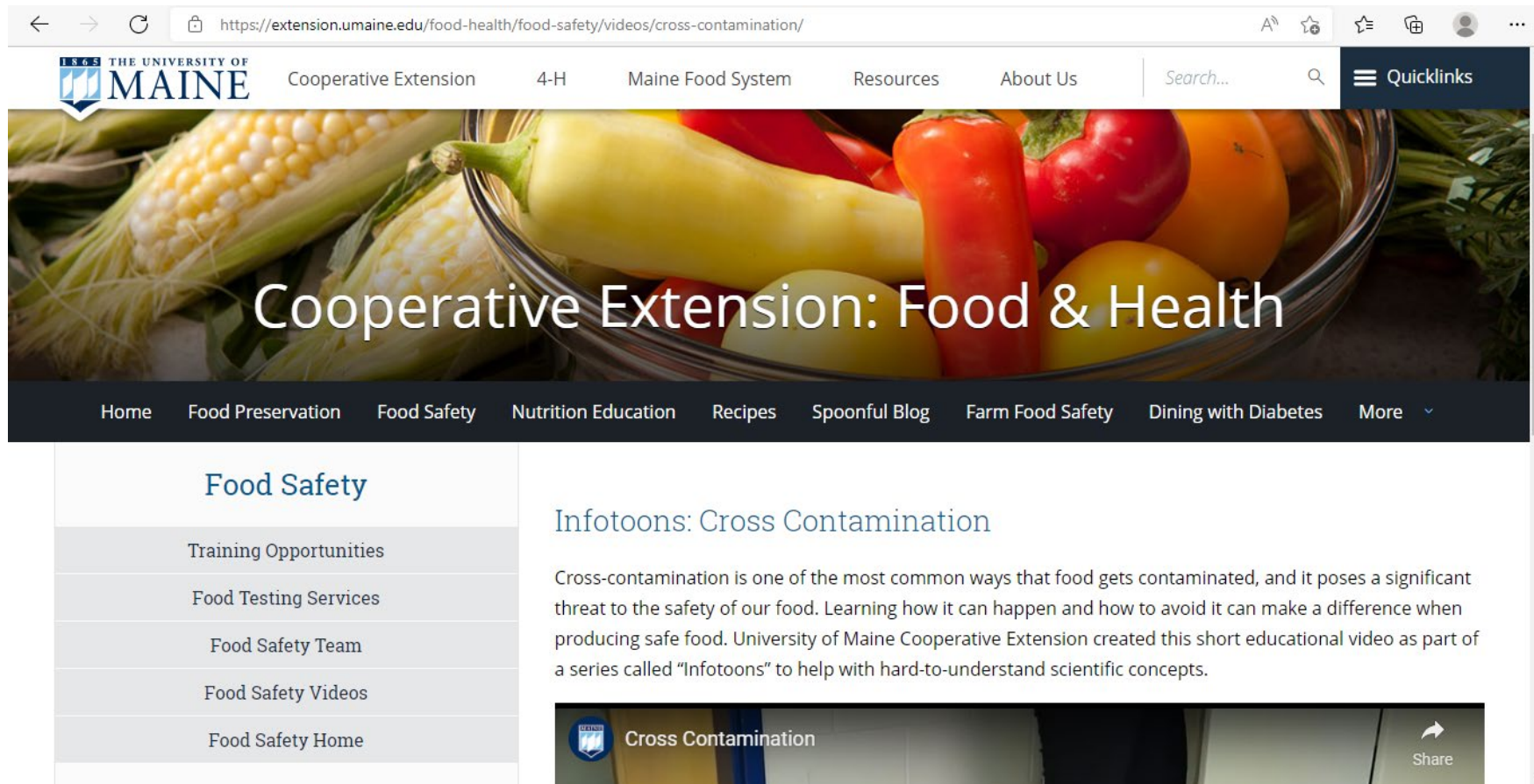
Example of In-House Training Pictures



Example of YouTube Training

University of Maine Cooperative Extension: Food and Health, available on Youtube

- [Cross Contamination - YouTube](#)



The screenshot shows a web browser displaying the University of Maine Cooperative Extension website. The URL in the address bar is <https://extension.umaine.edu/food-health/food-safety/videos/cross-contamination/>. The website header includes the University of Maine logo (1865 THE UNIVERSITY OF MAINE) and navigation links for Cooperative Extension, 4-H, Maine Food System, Resources, and About Us. A search bar and a Quicklinks menu are also present. The main content area features a large image of fresh vegetables (corn, peppers, tomatoes) with the text "Cooperative Extension: Food & Health" overlaid. Below this is a dark navigation bar with links for Home, Food Preservation, Food Safety, Nutrition Education, Recipes, Spoonful Blog, Farm Food Safety, Dining with Diabetes, and More. On the left side, there is a sidebar menu under the heading "Food Safety" with links for Training Opportunities, Food Testing Services, Food Safety Team, Food Safety Videos, and Food Safety Home. The main content area displays the title "Infotoons: Cross Contamination" and a paragraph of text: "Cross-contamination is one of the most common ways that food gets contaminated, and it poses a significant threat to the safety of our food. Learning how it can happen and how to avoid it can make a difference when producing safe food. University of Maine Cooperative Extension created this short educational video as part of a series called 'Infotoons' to help with hard-to-understand scientific concepts." Below the text is a video player with the title "Cross Contamination" and a "Share" button.

Example of FDA Website Training

← → ↻ <https://www.cfsanappsexternal.fda.gov/scripts/FDTraining/index.cfm> 🔊 ⭐ 📄 🏠 👤 ⋮

FDA Home ▶ Food Defense 101 Menu ▶ Food Defense Awareness ▶ Main Menu

Food Defense 101

Food Defense 101 Main Menu • Page 1 of 1

Introduction

The **Food Defense Awareness for Front-Line Employees** course provides awareness training for the front-line employee in food defense. The FDA is an agency within the Department of Health and Human Services, and is a scientific regulatory agency responsible for the safety of the nation's domestically produced and imported foods (as well as cosmetics, drugs, biologics, medical products, and radiological products).

Food Defense 101 has been developed by FDA to provide a resource to enable preparedness against an intentional attack against the nation's food supply. This course provides an overview of food defense and is designed to stimulate discussion of food defense within the industry. Specifically, this food defense awareness course is designed for individuals at actionable process steps and their supervisors to introduce food defense concepts and explain the importance of proper implementation of mitigation strategies designed to reduce significant vulnerabilities at the process step where they work.

Help us improve our training

Please answer a few questions about yourself to help us customize future training development efforts.

Select your Industry

Select your Locality

Select your Position

Select your Affiliation

SUBMIT

🔍 **Food Defense Awareness for Front-line Employees**

Challenges for Remote Sites

- Employee turn-over
- Short seasons
- Multiple Languages
- Limited Internet Access
- Records Availability





Food Safety Culture and Training

- Doing the right thing for the right reasons
- It's difficult to control people's motivations, but we can provide education that focuses on the right reasons
- Less focus on "follow the rules because it's the law" or "because we'll get in trouble if we don't"
- More focus on "follow the rules because it makes it safe for people to eat" and "because this is how it keep our food safe"
- How to evaluate your facility's Food Safety Culture?
 - Ask employees "Why do we do this?" and see if they answer "Because people are going to eat our food."

Practical Tips

- Be prepared and organized before you start, require general orientation before employees can work on the floor
- Have company-wide core curriculums but allow for differences from site to site
- Use a Training Matrix/program to keep track of who has completed which training
- Know when and how your records are going to be needed, and develop a system for filing

Practical Tips (continued)

- Make training interactive (discussion questions/pop quiz, hands-on practice)
- Use visual aids, props (Photos of processing areas/equipment, cartoons, bring hair nets, gloves, ear plugs)
- Make sure the Trainer understands the topic, and include multiple trainers for long trainings
- Take breaks for long sessions
- Be careful about using retraining as a corrective action, do some root cause analysis to find out why the initial training didn't work