The "REAL" Story on FSMA Preventive Controls - Dairy Plant Primer - January 2016

With the September 17th, 2015 formal release by the US Food & Drug Administration of the final requirements for the FSMA "Preventive Controls for Human Foods (PCHF)," the life of dairy processing plants, brokers of dairy ingredients and importers of dairy ingredients was changed forever.

The regulation is 928 pages long, but the actual requirements that directly impact dairy plants is much shorter (approximately 40 pages), still resulting in many of us going cross-eyed while trying to read and understand it. In addition, there were significant new or modified requirements compared to the January 2013 proposed regulation and its September 2014 update.

In order to demystify this regulation and its impact on dairy processing plants, we have created a "Primer" that in a few pages summarizes the September 17, 2015 PCHF regulation. FDA has committed to publishing a "Guideline" sometime in 2016 to also provide added clarity, but its availability may be too late for dairy plants that have to be in compliance by September 17, 2016. It is strongly recommended that dairy plants conduct a thorough review of this "Primer".

A complete outline of timelines, regulations and guidelines referring to: a Dairy Plant's Food Safety Plan, Preventive Controls Qualified Individual (PCQI), Employee Training & Qualifications and Specific Preventive Controls Requirements can be accessed by clicking here.

For more information on how to modify your plant's food safety operations to become FSMA PCHF compliant, please contact Allen Sayler with the ADPI Center for Excellence (asayler@cfsrs.com), or call Dan Meyer, Technical Director for ADPI at (630) 530-8700 x224). Begin this process as soon as possible to ensure your plant is ready when the FDA investigator walks in to enforce the PCHF.

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