

FSMA Has Arrived! What You Need to Know For Preventive Controls Compliance

Why is FSMA important to me?

Almond processors and some huller/shellers are covered by Preventive Controls (PC) for human food, which went into effect September 2016 for large operations.

Depending on the nature of your operations, additional FSMA rules that may apply to you are Preventive Controls for Animal Food, Sanitary Transportation of Human and Animal Food, Foreign Supplier Verification Programs (FSVP) for Importers of Food for Humans and Animals, and Intentional Adulteration.

How do I know whether Preventive Controls apply to me?

Preventive Controls apply if your operation is not a primary or secondary activities farm (nor connected to a farm) and it engages in hulling/shelling, sizing, sorting, processing or manufacturing activities (i.e., if you roast, chop, grind or coat almonds).

What do I need to do right now?

As a first step, confirm that your facility is current on the implementation of the FDA's Current Good Manufacturing Practice (CGMP) requirements. Keep in mind that under Preventive Controls, Huller/Shellers are exempt from CGMPs. However, a good CGMP program specific to these types of operations is still important and required of all food facilities in California.

You'll also need to have a Food Safety Plan prepared (or its preparation overseen) by a Preventive Controls Qualified Individual (PCQI). Almond Board of California has provided PCQI training sessions and will offer additional sessions in the future. Please contact us to inquire about upcoming training dates. The Food Safety Plan must include the following elements, and you need to document its implementation in records that you will need to keep and make available to the FDA for review and copying:

- A hazard analysis
- Preventive controls
- Monitoring procedures
- Corrective action procedures
- Verification procedures
- A supply chain program, if appropriate
- A recall plan

While not required, we advise having a conversation with each of your suppliers and customers to understand their plans and whether they plan to pursue any exemptions.

Compliance Deadlines:

For larger businesses the primary compliance date was:

Sept. 19, 2016

>500 employees

For midsize businesses the primary compliance date is:

Sept. 18, 2017

<500 employees

For smaller businesses the primary compliance date is:

Sept. 17, 2018

<\$1 million in sales

Additional Resources:

- FDA Resources on Preventive Controls Rule: <https://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm334115.htm>
- Preventive Controls Alliance: <https://www.ifsh.iit.edu/fspca>
- UC Food Safety: <http://ucfoodsafety.ucdavis.edu/>

Visit almonds.com/processors/fsma for more information.

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