



NATIONAL REGISTRY OF FOOD SAFETY PROFESSIONALS EXPANDS TO INCLUDE HACCP

The passage of the Food Safety Modernization Act (FSMA) ushered in a new era of regulation and oversight designed to further improve the safety of food from farm to fork with an emphasis on prevention rather than response.

While many companies throughout the food chain have developed a series of safety programs, FSMA now requires that all FDA-regulated food companies develop and implement written food safety plans, or HACCP (Hazard Analysis and Critical Control Points). The requirement of written food safety plans would apply to all facilities that manufacture, process, pack or hold human food. With only a handful of exemptions as we now understand it, the new preventive control provisions would apply to facilities that are required to register with FDA under FDA's current food facility registration regulations. Companies that think they may fall under the new rule should discuss the exemptions to understand how the rules apply to them.

This new FDA rule requires that firms develop and implement written food safety plans to identify potential food safety hazards, put into place steps to address those hazards, verify that the steps are working, and outline how to correct any problems that arise. Under the new requirements, the written food safety plans should, at a minimum, include the following:

1. a hazard analysis;
2. risk-based preventive controls;
3. monitoring procedures;
4. corrective actions;
5. verification procedures; and
6. record keeping.

In addition to creating plans that will pass the scrutiny of FDA, food companies will also need to demonstrate that these plans have been designed by a "qualified individual."

For years with guidance by organizations like the International HACCP Alliance and others, companies have developed training programs for individuals who would be deemed “qualified.” The burden of proof of qualification ultimately became the quality and integrity of the HACCP plan and its implementation. For companies hiring an individual to develop and implement the plan, they trusted that the individual obtained the requisite knowledge from one of the many courses offered for HACCP managers and auditors.

The National Registry of Food Safety Professionals established a presence in the food profession through the development and delivery of a food safety manager certification program for individuals in the retail industry. That program, which is accredited under two different standards (both the Conference for Food Protection Standards as well as ISO/IEC 17024) established National Registry’s role as a company positioned to help identify “qualified individuals” through the successful completion of a psychometrically valid examination -- in this case, managers of retail food establishments.

As FSMA worked its way through Congress, it became apparent that the identification of a qualified individual as required under the new rules could be left to interpretation. Because of that, training alone may not be enough to meet either the spirit or the letter of the law. As many in the food industry know, it is not until the point of inspection or audit that you learn that you are not in compliance...often times too late.

Because HACCP is a management system that touches raw material production, procurement and handling, manufacturing, distribution and finally consumption of food, it was important for National Registry to assemble a global representation of experts to define the need and develop an examination that would comprehensively address the HACCP system within that wide range of organizations.

Starting in late 2012, National Registry started the long process of developing the examination. After months of development, review and testing, the exam is set to be introduced this July.

To ensure an effective learning system and maintain the independence of the examination process, National Registry is working with a wide range of training bodies who will use the examination, recognizing that a valid and independent examination will provide the burden of proof that a qualified individual is, indeed, qualified. Indeed, it is a great partnership among trainers, examination provider, industry, and consumers that will help ensure a preventive food safety system.

For more information on National Registry’s HACCP examination, please visit the [National Registry website](#).