

Rainy Day Food Regulatory Projects

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Looking at some downtime between emergencies? It's always a good idea to plan ahead for the next emergency! Some rainy day projects your regulatory team can do include scheduling an audit of your regulatory operations, and reviewing your recall program.

When conducting an audit, try to use a fresh set of eyes. Things that appear to be clean or in good working order to you because you see it day in and day out may appear unsanitary or in disrepair to someone not familiar with the facility. Also, it is always a good idea to review the procedures for handling an FDA inspection. These procedures should include the corporate policy for refusing to read, copy or sign any affidavit. All facilities subject to FDA inspection should have such a procedure, given that FDA is mandated under the **Food Safety Modernization Act** to conduct a greater number of inspections over the next few years. Everyone needs to be familiar with the plan for handling an FDA inspection, because it can happen, unannounced, at any time.

Food recalls are an ever present threat, and it's important to review recall strategies periodically. For example, make sure the recall team identified in the plan is correct, that the list of contacts in the event of a recall is current, and that shipping and receiving records provide sufficient traceability. It might also be a good opportunity to review lot or batch identification to ensure that it is sufficiently descriptive to allow for targeted product recalls.

It may involve some work, but these preventative steps can help save costs and prevent agency actions ahead of time before the worst happens.

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