

FIBCA

FOOD SAFETY GUIDE



AN INTERACTIVE GUIDE TO:

FIBCA Statement on Food Grade Standards

FDA Regulations and Misconceptions

Clean Room Check-List

The Global Food Safety Initiative (GFSI) and Recognized Packaging Schemes

The Status of the Food Safety Modernization Act

Another Educational Resource Provided by:



Flexible Intermediate Bulk Container Association



Statement from FIBCA:

*The topic of food safety in the packaging industry is constantly evolving, with tougher industry standards and increased government regulations becoming the norm. FIBCA recognizes that there are many adequate food safety processes, accreditations, certifications, and schemes for the production of FIBCs; and therefore recommends that all manufacturers, distributors, and users of FIBCs confirm that their process is adequate for each FIBC application. While FIBCA does not endorse one food safety scheme over another, it does strongly support the effort of the **Global Food Safety Initiative** to establish a global standard.*

The FDA Myth:

While many users of FIBCs may request an “FDA Approved” bulk bag, it is important to note that such a product does not exist. **The Food & Drug Administration does not issue any approvals or certifications of FIBCs or FIBC liners.**

The FDA regulations that govern food contact can be found [here](#). With regard to polypropylene resin, a major component of most FIBC fabric, FDA Food Contact Regulation [21 CFR 177.1520](#) states that 100% virgin polypropylene resin "may be safely used as articles or components of articles intended for use in contact with food"



A Clean Room Checklist:

FIBCs for food products should be manufactured in a clean room environment. While the definition of a “clean room” varies, there are certain standards which should be present in all clean room facilities. Here’s quick checklist to help you ensure that your FIBCs are being manufactured in a proper environment.

- ✓ Proper Ventilation
- ✓ Pest Control Procedures
- ✓ Metal Detection
- ✓ Light Table Inspection
- ✓ Vacuum / Air Cleaning
- ✓ Proper Personnel Wardrobe
- ✓ Proper Personnel Hygiene
- ✓ HACCP Program
- ✓ Record Keeping

Global Food Safety Initiative (GFSI):

The Global Food Safety Initiative is a non-profit foundation created under Belgian law, and operated under the Consumer Goods Forum in a mission to globalize our food safety processes. GFSI benchmarks existing third-party food safety schemes in order to achieve a worldwide standard. With the support of many of the world's largest food manufacturers and retailers, GFSI is quickly becoming the global leader on the topic of food safety in the supply chain.

GFSI:

- ✓ Benchmarks **existing** third-party schemes against a global Guidance Document
- ✓ Recognizes specific schemes for individual scopes of the food manufacturing process
- ✓ **Does not** issue its own certification or accreditation

A Few GFSI Supporters:



GFSI Scope "M" – Production of Food Packaging:

The following are third-party food safety schemes that have been recognized by the Global Food Safety Initiative for the production of food packaging. **Click on the individual scheme logo below for additional information.**

	<p>British Retail Consortium (BRC) <i>BRC Global Standard For Packaging & Packaging Materials; Issue 4</i></p>
	<p>Safe Quality Food Institute (SQFI) <i>SQF Code 7th Edition; Level 2</i></p>
	<p>Food Safety System Certification 22000 (FSSC) <i>FSSC 22000 October 2011 Issue</i></p>
	<p>International Featured Standards (IFS) <i>IFS PACsecure, Version 1</i></p>

Food Safety Modernization Act (FSMA):

The Food Safety Modernization Act (FSMA) was signed into law in January 2011. The purpose of the legislation is to ensure that the US food supply is safe by shifting the focus of federal regulators from **responding** to contamination to **preventing** it. FSMA grants the Food and Drug Administration (FDA) new authoritative powers, including mandatory recall, container detention, foreign supplier verification, and records inspection.

FSMA Implementation Update:

FSMA regulations were originally scheduled to begin implementation in 2012, however; the first two measures (of seven) were only recently published in September 2015. The implementation phase remains severely underfunded, with the FDA having received less than half of the \$580 million that had been allocated to rollout the legislation between 2011 and 2015.

The Preventive Controls for Human Food rule and the Preventive Controls for Animal Food rule were finalized on September 10, 2015. Compliance will begin for most food companies by September 2016. Legally, these provisions do not directly impact food packaging manufacturers / distributors, but the packaging industry will undoubtedly feel the effects through increased quality control requirements from food manufacturing customers.

FSMA & The Food Packaging Industry:

At this time, the FDA implementation process is focused first and foremost on food manufacturers. The direct impact on the food packaging industry is very much unknown. However, packaging manufacturers and distributors should prepare for the impacts of two key provisions:

Preventive Controls (Final)

- Requires all “registered food” facilities to have a detailed hazard analysis and prevention plan in place
- According to the Federal Food Drug & Cosmetic Act (FFDCA), “food” excluded “food contact substances” for registration purposes (i.e. food packaging companies would not be legally accountable to FDA for this provision).
- Packaging companies will still be accountable to their customers

Foreign Supplier Verification (Proposed)

- Applies to all “importers of food” and requires verification activities to ensure that imports are in compliance with Preventive Controls measure, are not adulterated, and do not contain undeclared food allergens
- For the purposes of this provision, “food” **does include** food packaging
- Defines “Importer” as USA owner or consignee (or agent/rep of foreign owner) of the article of food at time of entry to the United States