

Packing Houses and the Preventive Controls Rule

Avocado Packing Houses must establish and implement a food safety system that includes an analysis of hazards and risk-based preventive controls and a written food safety plan that includes all aspects the hazard analysis and risk-based preventative controls plan (HARPC) which is at least equal to the provisions of the Preventive Controls final rule and corresponding Food Safety Modernization Act. A trained and certified "Qualified Individual" who has completed the FDA approved training curriculum is required in each packing facility to write and enforce the food safety plan for that specific facility.



Packing houses will only provide fruit to an importer who is in compliance with the Foreign Supplier Verification Program final rule of the Food Safety Modernization Act, which has taken certain risk-based activities to verify that food imported into the United States has been produced in a manner that meets applicable U.S. safety standards.

Current Good Manufacturing Practice and Hazard Analysis and Risk-Based Preventive Controls for Human Food otherwise known as The Preventive Controls for Human Food Rule

Key Provisions of the Preventive Controls Rule:

- Hazard Analysis:

Avocado Packing Houses must establish and implement a food safety system that includes an analysis of hazards and risk-based preventive controls and a food safety plan which is written by a "Preventive Controls Qualified Individual" that includes all aspects of this HARPC plan.

- Preventive Controls:

These measures are required to ensure that hazards requiring a preventive control will be minimized or prevented. They include process, food allergen, and sanitation controls, as well as supply-chain controls including a recall plan. Therefore, all packing plants need to ensure that they source and pack only those avocado that are grown in accordance with the produce safety rule.



- Oversight and Management of Preventative Controls:

Monitoring to ensure preventive controls are consistently performed, corrective actions to reduce the likelihood a problem will recur and verification activities to ensure that preventive controls are consistently implemented and effective are all key components of oversight and management.



- Current Good Manufacturing Practices are Updated and Clarified:

Some of the previously nonbinding provisions, such as education and training, are now binding. In other words, education and training are now required under the law.

The regulation requires that a “Preventive Controls Qualified Individual” who has “successfully completed training in the development and application of risk-based preventive controls” must complete certain activities and be trained according to a specific curriculum developed by the *Food Safety Preventive Controls Alliance*. This curriculum, known as Preventive Controls Qualified Individual training (PCQI Training), was developed jointly between the Food and Drug Administration in partnership with the Food Safety Preventative Controls Alliance.

“The Food Safety Preventive Controls Alliance (FSPCA) is a broad-based public private alliance consisting of key industry, academic and government stakeholders whose mission is to support safe food production by developing a nationwide core curriculum, training and outreach programs to assist companies producing human and animal food in complying with the preventive controls regulations that will be part of the Food Safety Modernization Act (FSMA).”

For more information on the FSPCA and corresponding PCQI training programs see below:

<https://www.ifsh.iit.edu/fspca>

For more information on the Preventive Controls for Human Food Rule see below:

<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm334115.htm>