

Food Safety Plan Builder is Very Helpful, but Not the End of Your Plan

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The Food and Drug Administration has new software to guide you through the creation of a food safety plan. But just because you follow it, doesn't mean you're automatically compliant with all federal regulations.

[The software is available online](#), and walks users through the steps to create a food safety plan required by the Food Safety Modernization Act and the Preventative Controls for Human Food Rule and other regulations finalized by the FDA.

While the FDA points out that it believes the plan builder is consistent with existing agency guidance and regulations, the plan builder contains disclaimers indicating that use of the software is optional and will not assure that your food safety plan fulfills the federal agency's requirements.

Use of the software may be optional, but having a food safety plan is not. For many medium and smaller-sized food processors and manufacturers, use of the FDA's plan builder will be helpful in addressing both missing elements in their food safety plan and comparing their food safety plan to the results generated by using the plan builder. Bear in mind that the quality of any food safety plan is determined by the quality of the analysis and information a business provides.

Most manufacturers should have in place a Hazard Analysis and Critical Control Point (HACCP) plan addressing biological, chemical and physical hazards to their products which could form the partial basis for their food safety plan. Manufacturers using the plan builder should consider whether the resulting food safety plan will be adequate under your specific circumstances and whether additional input from your quality assurance personnel or outside assistance would be useful.

For a number of manufacturers, use of the plan builder undoubtedly will assist in both analyzing existing plans and identification of analytical gaps in your food safety approach, as well as in enhancing your food safety interactions with your supply chain.

If you have questions about which Food Safety Modernization Act regulations apply to you - and when they do - or questions about the application of specific FDA food safety regulations to your food safety plan, [please contact me](#) or any of the attorneys in [Barley Snyder's Food & Agribusiness Industry Group](#).

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Timothy G. Dietrich

Counsel

Tel: (610) 898-7154

Email: tdietrich@barley.com