

Frontline Preparedness:

For SQF Edition 10

Today's Presenter:

Cameron Prince

The Acheson Group



FSMAFRIDAY

Monthly Industry News, Updates & Trends for Food, Beverage, & CPG Manufacturers



What is FSMA Fridays?

- ✓ Monthly FSMA Related News
- ✓ Regulation Changes & Updates
- ✓ Industry Trends
- ✓ Q&A with TAG



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A global food safety and public health consulting group made up of seasoned industry experts.

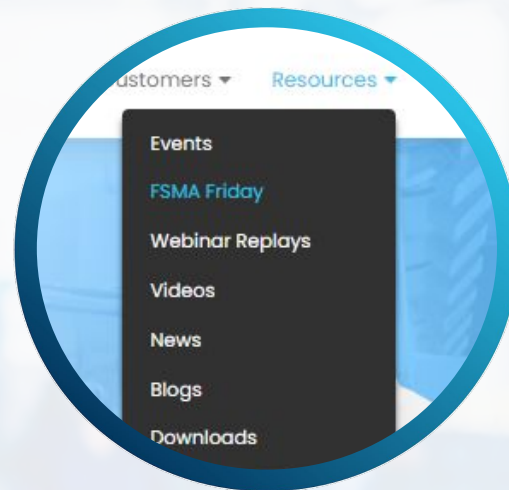


SAFETYCHAIN

Award-winning digital plant management platform to visualize plant-wide performance and better control quality, yield & production optimization.

Before We Get Started...

- ✓ Only panelist microphones are on
- ✓ Ask questions! (Q&A at end)
- ✓ Recording link will be shared
- ✓ Audio issues: use call-in number



Watch prior FSMA Friday recordings at
safetychain.com > Resources > FSMA Friday

Meet Your FSMA Friday Speaker

Cameron Prince

Executive VP, Regulatory Affairs and Managing Director, TAG Canada



- Former VP of Operations at the Canadian Food Inspection Agency (CFIA) — the most senior executive overseeing Canada's national food inspection program
- Led the food safety modernization initiative that shaped the Safe Food for Canadians Regulations (SFCR)
- Certified lead auditor for BRC and FSSC 22000; certified HACCP trainer (NSF); FSMA Preventive Controls lead instructor
- 35+ years across GFSI schemes, food safety culture, regulatory programs, and crisis management in the US and Canada
- Active in CODEX and multilateral food safety organizations



Agenda

01.

Regulatory Updates

02.

Frontline preparedness: for SQF Edition 10

03.

Q&A

04.

SafetyChain Demo

Recent Regulatory Updates Overview

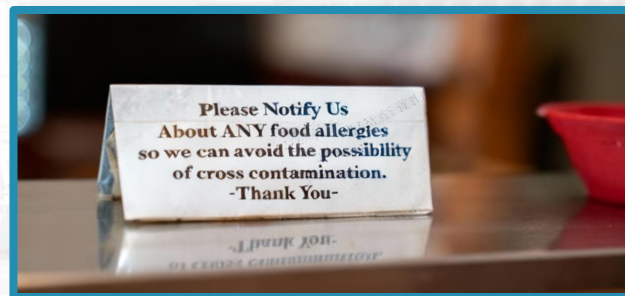
Memorandums of Understanding (MOUs)

- FDA and EPA have a new MOU to exchange scientific information
- Focus on research of human health effects of glyphosates



Foodborne Illness Risks in Retail Delis

- FDA has released a report on Retail Food Store Delis and Foodborne Illness Risk Factors
- The report addresses inadequate cooking, poor personal hygiene, and use of food from unsafe sources



Frontline preparedness: for SQF Edition 10

Edition 10: more than a documentation update

The shift is toward demonstrating that food safety controls are connected, risk based, and effective.

RISK BASED

Decisions supported by risk assessment and scientific or operational rationale.

EVIDENCE BASED

Records show implementation — not simply that a procedure exists.

INTEGRATED

HACCP, EMP, sanitation, training, CAPA and change management need to connect.

EFFECTIVENESS

Auditors look for evidence controls work, trends are reviewed, and actions drive improvement.

The readiness question: **‘Can we explain why it’s designed this way, show it’s implemented, and demonstrate it’s working?’**

Where to focus first

Prioritize the changes that affect system design, evidence, and audit risk.

CORE CLAUSES: NEW WEIGHTED AUDIT SIGNIFICANCE

- 2.1.1 Management Responsibility
- 2.1.2 Management Review
- 2.1.3 Complaint Management
- 2.3.4 Approved Supplier Program
- 2.4.3 Food Safety Plan
- 2.4.8 Environmental Monitoring
- 2.5.3 Corrections, Corrective & Preventative Actions
- 2.6.1 Product Identification
- 2.8.1 Allergen Management
- Module 9 example: 9.2.5 Cleaning & Sanitation, 9.7.3 Foreign Matter

Minor = -2 pts | Major = -7 pts

OTHER CHANGES TO PRIORITIZE

Food Safety Culture

Formal assessment plan required: communication, training, employee feedback, and regular measurement.

Change Management

New dedicated §2.3.5: planned, temporary, emergency, and unplanned changes evaluated for food safety impact.

Environmental Monitoring

Documented risk assessment; EMP linked to HACCP hazards with justified sites, organisms, frequency, timing, and response.

CAPA / Management Review

Root-cause method and effectiveness evidence strengthened; monthly management updates now specify CAPA, audits, and complaints.

Vertical Audit

Auditor follows a product/batch and tests documentation, records, interviews, and site practices across the food safety system.

Poll 1

How would you describe your plant's SQF Edition 10 readiness right now?



- A** We've completed a gap assessment and have a plan in place
- B** We know a gap assessment is needed but haven't started
- C** We're relying on our Edition 9 program for now
- D** We haven't looked at this yet — that's why I'm here today

1. Food safety culture: move from activities to a measurable plan

A formal Food Safety Culture Assessment Plan is now required, with communication, training, employee feedback, and regular measurement/evaluation.

Practical program design

OBJECTIVE	ACTIVITY	MEASURE	REVIEW	ACTION
What behavior or outcome do we want?	What will we do to influence it?	How will we know if it is changing?	What does the trend tell us?	What will leadership do next?

Auditor question: "Show me your Food Safety Culture Plan and show me how you know it is working."

Key tip: Connect the FS Culture Plan to training, GMP behaviour, employee feedback, complaints management, KPI, CAPA, and management review.

Connect what your site already does into a structured assessment and improvement cycle.

Food safety culture in practice: six initiative areas

Goal-setting & KPI

Set food safety metrics in annual operational priorities to secure alignment.

Food Safety Training

Formal FS training for cross-functional teams including leadership; audience-targeted delivery.

QFS Network

Quarterly cross-functional meetings; annual connects discussing goals, performance, and SWOT.

Building Ownership

Employee-generated content and quotes in marketing; life-size posters; peer recognition.

Employee Surveys

Do employees have the information they need? What is the level of empowerment?

QFS Cross-Audits

4x deeper audits comparing QA managers independent of function; partnership with operations.

Each area gives leadership a concrete lever to drive and measure culture improvement.

2. Change management: build a trigger, not another form

Change Management is now a dedicated requirement (§2.3.5): temporary, emergency, unplanned, and CAPA-driven changes must be evaluated, documented, communicated, and confirmed/validated.

Label / packaging	Temporary repair	Emergency	CAPA-driven changes	Construction / process
1 What is changing? Identify the trigger: planned, temporary, emergency, or corrective-action-driven	2 Assess food safety impact HACCP? EMP? Allergens? Sanitation? Training?	3 Approval & validation Cross-functional? Document approval? Validation needed?	4 Verify post-change effectiveness Confirm the change achieved its intent without new risk	

Evaluate food safety impact before, during, and after every change, planned or not.

3. Environmental monitoring (EMP): explain the why

EMP is explicitly risk based: the site must document the assessment behind the program and connect monitoring to hazards identified in the food safety plan.

1 START WITH THE HAZARD

What organisms are relevant? Use HACCP / food safety plan + product & process risk.

2 MAP THE FACILITY

RTE / post-lethality vs raw. Zones 1-4 • drains • traffic • wet areas • transitions.

3 RISK-RANK LOCATIONS

Product proximity • moisture • harborage/cleanability • traffic/cross-zone movement • history/trends.

4 DESIGN THE EMP

Organism → Zone → Site → # Sites → Frequency → Timing. Rotation/randomization follows the risk rationale.

5 DEFINE LOSS OF CONTROL

Alert/action criteria → vector sampling → cleaning → resampling. Escalation + criteria to return to routine monitoring.

PRACTICAL EXAMPLE

Location	Characteristic	EMP implication
Drain beside exposed RTE line	Wet + near product + harborage potential	Zone 3 • <i>Listeria</i> spp. • Higher frequency
Conveyor framework	Near product + difficult to clean	Zone 2 • rotating sites
Forklift / wheel route	Cross-zone traffic / transfer potential	Targeted Zone 3/4 monitoring
Dry warehouse wall	Dry + remote from exposed product	Lower relative frequency

A sampling schedule is not the same as a risk assessment.

Poll 2

When your EMP was designed, was it built from a documented risk assessment?



- A** Built from a formal risk assessment, tied to our food safety plan
- B** Started from a template; adapted but rationale not formally documented
- C** Honestly, I'm not sure how the original program was designed
- D** We're in the process of rebuilding it now

4. Close the loop: management review + CAPA

CAPA now places clearer emphasis on documented root-cause methods and effectiveness; monthly management updates explicitly include CAPA, audit results, and food safety complaints.

1) Issue

Identify the non-conformance or trigger event

2) Immediate correction

Stop the problem from continuing right now

3) Root cause

Document the method used and evidence found

4) Corrective & preventative action

Address root cause; prevent recurrence

5) Effectiveness review

Documented evidence that the action worked

6) Trend & learn

Feed results into management review cycle

Effective management review = decisions + resources + actions + accountability

Poll 3

Does your management review produce documented decisions — with owners and deadlines?



- A** Yes — every meeting closes with assigned actions
- B** Sometimes, but it's inconsistent
- C** We document what was discussed, not always what was decided
- D** I'd have to find out

5. Vertical auditing: check if the system connects

Follow one product or batch through the system: do procedures, records, people, and decisions tell the same story?

The audit methodology uses a vertical audit exercise: follow a product/batch and test whether procedures, records, interviews, and site practices tell the same story.

CCP / Processing Records

Formulation & Specs.

Allergens & Line
Clearance

Sanitation & EMP

FINISHED
PRODUCT

Supplier Approval

Training / Competency

Maintenance / Change
Management

CAPA & Management
Review

Poll 4

If an auditor followed one of your products through your system tomorrow, where would the story break down?



- A** Records are there but wouldn't connect — silos between departments
- B** Procedures exist; less confident about evidence of implementation
- C** People would give inconsistent answers to the same question
- D** We'd hold up — we've done the work

Your Edition 10 readiness roadmap

A practical sequence from understanding the change to demonstrating sustained implementation.

1

GAP ASSESS

Edition 9 vs. Edition 10: know where the real gaps are before you start building.

2

PRIORITIZE

Core clauses + material changes. Not all changes carry equal audit risk.

3

BUILD & STRENGTHEN

Culture

- change management
- EMP
- CAPA.

Implement early enough to accumulate records.

4

GENERATE EVIDENCE

Implement early: start now and accumulate 90 days of records before the audit.

5

TEST THE SYSTEM

Internal + vertical audits. Does the system tell the same story end to end?

Start early enough to show the system operating over time, not just updated documents immediately before the audit.

From requirement to readiness: where additional expertise helps

Where TAG expertise can accelerate implementation and strengthen audit defensibility.

Edition 10 Gap Assessment

Know where the real gaps are before you build.

Food Safety Culture Program

Turn activities into measurable improvement.
TAG has expertise in FS culture assessments.

Change Management

Build a practical risk trigger for your team.

EMP Risk Assessment & Program

Design
Strengthen the scientific rationale behind your program.
TAG has SMEs in microbiology (EMP) and sanitation.

Internal / Vertical Audits

Test whether the system connects end to end.
TAG offers best-in-class crisis management simulation exercises.

Implementation & Readiness

Support
Coach your teams through CAPA closeout and audit preparation.

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Questions?



Join us in October



Friday
Oct. 30



9:00 AM PT
12:00 PM ET

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