

Physical Facility Compliance a Stepping Stone Towards Food Safety Audit Requirement

By BT Gorti



Compliance with food safety norms can save recurring costs

Food business operators should understand the primary responsibility lies with them for the delivery of safe food products across the food chain. This can only happen when food business operators plan for strategic investment in the compliance of his or her facility against the food safety standards.

Strategic Investment in Gap Audit Exercise

The ideal strategy would be getting the GAP audit of the facility against the compliance of the food safety standard which is required by the market department. The GAP audit should cover facility compliance to current documentation status against the audit requirement of food safety standards.

At the design phase of the project various important criteria must be taken into account. For example, the zoning of the factory to prevent cross contamination based on risk analysis. If this is not done, the management may land up having to make huge investments at a later stage to compile with the food safety standards. This may even end in recurring expenses on closing the audit observation.

If the facility is not aligned with the proper linear flow, it is difficult to ensure 100 percent compliance with the latest food safety system correctly. In such a scenario it is better to think of a new facility to be constructed as per compliance of the latest food safety standards rather than spending more

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money in correction and refining of the facility.

In coming years, India will face a paradigm shift in food safety audit, compliance, monitoring and implementation of food safety as continuous improvement tools for the food industry. The need of the hour for business owners is to run the food business to satisfy customer demand, to fulfill the government mandatory requirement or to meet the international trade agreement. Hence it is difficult to think of a food processing facility not in compliance with food safety standards. Either the facility will not get the order to run the operation or the regulatory and mandatory requirement of food safety will influence the decision maker to take a call on building a new facility.

If the new project is in compliance with food safety standard at the design stage itself, then food business operators would have won half the battle by the time the food business starts commercial operations.

Facility compliance criteria based on Schedule 4 of Food Safety Standard Authority of India (FSSAI) Act 2006

Layout & Design of Food Establishment Premises	
(a)	As far as possible, the layout of the food establishment shall be such that food preparation/manufacturing processes are not amenable to cross-contamination from other pre and post manufacturing operations like goods receiving, pre-processing
(b)	Floors, ceilings and walls must be maintained in a sound condition to minimise the accumulation of dirt, condensation and growth of undesirable moulds. They should be made of impervious material.
(c)	Doors shall also be made of smooth and non-absorbent surfaces.
(d)	The floor of food processing / food service area shall have adequate and proper drainage and shall be easy to clean and where necessary, disinfect. Floors shall be sloped appropriately to facilitate drainage in a direction opposite to the direction of food preparation / manufacturing process flow.
(e)	Adequate control measures should be in place to prevent insects and rodents from entering the processing area.

Some examples of building facilities compliance requirement are described in the tables but are not limited to these criteria alone. These criteria are very comprehensively covered in schedule 4 of Food Safety Standard Authority of India (FSSAI) act 2006.

Facility compliance has many facets of audit requirement. This may range from construction of change room, wash room to purchase of expensive foreign matter deduction equipment like X ray machine. We often come across cases where electrical connections, wiring

and electrical fitting are running on the walls and exterior. With latest food safety issues and requirements dominating the decision making process, the concept of concealed wiring system has become the norm in the latest food industry design

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Drainage and Waste Disposal
Food waste and other waste materials shall be removed periodically from the place where food is being handled or cooked or manufactured to avoid building up. A refuse bin of adequate size with a proper cover preferably one which need not be touched for opening shall be provided in the premises for collection of waste material. This shall be emptied and washed daily with a disinfectant and dried before next use.
The disposal of sewage and effluents (solid, liquid and gas) shall be in conformity with requirements of Factory/Environment Pollution Control Board. Adequate drainage, waste disposal systems and facilities shall be provided and they shall be designed and constructed in such manner so that the risk of contaminating food or the potable water supply is eliminated.
Waste storage shall be located in such manner that it does not contaminate the food process, storage areas, the environment inside and outside the food establishment and waste shall be kept in covered containers and shall be removed at regular intervals.
Periodic disposal of the refuse/waste should be made compulsory. No waste shall be kept open inside the premise and shall be disposed of in an appropriate manner as per local rules and regulations including those for plastics and other non environment friendly materials.
Air Quality & Ventilation
Ventilation systems natural and /or mechanical including air filters, exhaust fans, wherever required, shall be designed and constructed so that air does not flow from contaminated areas to clean areas.
Lighting
Natural or artificial lighting shall be provided to the food establishment, to enable the employees/workers to operate in a hygienic manner. Lighting fixtures must wherever appropriate, be protected to ensure that food is not contaminated by breakages of electrical fittings.
Packaging materials or gases where used, shall be non-toxic and shall not pose a threat to the safety and suitability of food under the specified conditions of storage and use.

standards. The entire facility should ideally have concealed wiring with all electrical equipments closed properly with unbreakable covers under lock and key. Facility design should take care of prevention of pest entry in the workplace.

mandatory requirement. The planning for rest room facility, dining hall, and separate rooms for lorry drivers will add up the cost of project initially but bring down the later cost involved in reducing the foreign body contamination during commercial operations.

designing rain water harvesting line along with proper road coupled with proper drainage system will certainly reduce the risk associated with foreign body contamination and will increase the audit score during the surveillance audit of food safety standards.

Each room in the facility should be complied with lux requirement as per

Even construction of effluent treatment plant, sewage treatment plant,

The world is witnessing a wave of food safety and mandatory regulations via USA (FSMA), Canada (Safe food for Canada), India new Food safety FSSAI 2006 act and Philippines Food Safety Act 2012. Hence it is worth spending on GAP audit on physical facility. This will in turn, set the tone for food business operator's future food safety compliance journey with cakewalk.

FACILITIES
Water Supply
Only potable water, with appropriate facilities for its storage and distribution shall be used as an ingredient in processing and cooking.
Water used for food handling, washing, should be of such quality that it does not introduce any hazard or contamination to render the finished food article unsafe.
Water storage tanks shall be cleaned periodically and records of the same shall be maintained in a register.
Non potable water can be used provided it is intended only for cleaning of equipment not coming in contact with food.
Non potable water pipes shall be clearly distinguished from those in use for potable water.
Washing of Raw Materials
Adequate facilities for washing of raw food should be provided. Every sink (or other facilities) for washing food must have an adequate supply of hot and/or cold water. These facilities must be kept clean and, where necessary, disinfected. Preferably, sinks which are used for washing raw foods shall be kept separate and that should not be used for washing utensils or any other purposes.
Ice and Steam Ice and steam used in direct contact with food shall be made from potable water and shall comply with requirements



The author is a food consultant and heads the Saradiro E Services Pot Ltd. He is a food safety lead auditor ISO 22000 FSMS, BRC food safety version 6.0. B T Gorti has nearly 25

years of rich experience and expertise in the food processing & FMCG sectors. His clients include leading firms from across the country.