

The truth about food safety and company culture

Lately, we have been hearing a lot about “food safety culture” and the role it plays in keeping companies out of trouble (recalls, regulatory citations, etc.). But what is it, how do we identify it, and does it really matter? The concept of a food safety culture is not a “flavor of the month” ideal. To make our food safety systems work, it is critical that we ensure we have a strong food safety culture within our operation.

Food safety certifications, such as any of the Global Food Safety Initiative (GFSI) schemes (e.g., SQF, BRC, FSC22000, etc.), are often looked at as the Holy Grail. They are seen as a means to fulfill customer requirements, attract new customers, or generally “prove” their food safety programs are solid and compliant with current regulations. It is true that these certifications require programs that form a good backbone to a company’s system; however, they don’t always guarantee the operation is compliant, safety measures being taken are adequate, or that the system is followed every day and not just during the operation’s certification audit.

What does a lack of food safety culture look like?

I have seen food safety personnel chasing down non-compliances to the extent they do not have time to complete other tasks. I have also seen non-compliances not being observed, noted, and/or corrected due to lack of time to oversee employees on a constant basis or the inability to correct employees. When I say “inability”, I mean that oftentimes quality and food safety personnel do not have the authority to correct employees and have to leave that to production supervisors who value production efficiency over food safety. Why would production personnel not value food safety, you ask? Because management has set their goals around low downtime, high yield, and reduced labor costs. These are valuable goals for the operation as they can increase margins and support revenue opportunities. Quality and food safety can sometimes be viewed as a “cost center”. This viewpoint demonstrates a lack of food safety culture and can result in decreased productivity and the risk of regulatory citations and/or recalls.

What are the elements of a true food safety culture?

A food safety culture ensures that the system is supported each day by both management and employees. It includes implementation of effective documented food safety programs, necessary resources to support those programs, strong communication systems, and empowerment of all employees in production, warehousing, shipping and receiving, the laboratory, or any other area in the facility that handles product or packaging. The crucial elements include:

- 1) A strong and effective food safety plan that considers all applicable risks,
- 2) Management that models the food safety protocols,
- 3) Resources provided by management that fully support the implementation of the food safety plan,
- 4) Communication systems that extend from the top down and reflect back from the bottom up, and

- 5) Proactive management of the food safety systems to correct non-conformances and prevent them from reoccurring.

Effective programs are the backbone of the culture

Food safety programs must be well-documented and be developed to mitigate all foreseen and unforeseen risks. For example, all raw materials, processing aids, and packaging must be reviewed for potential contamination, adulteration, or substitution risks based on historical company or industry events, regulatory changes, and new discoveries within the industry. Handling, manufacturing, and/or distribution practices, equipment, and facility conditions must also be evaluated to ensure lack of food contamination or breaches in food defense. This risk evaluation must be comprehensive and oftentimes scientifically backed and requires a great deal of up-to-date knowledge in each of these areas.

Management commitment and modeling of the food safety protocols is key

Most food certification standards require a statement of management commitment as part of the overall food safety plan. However, these must be more than just words within a document. Management commitment is the most critical piece to a food safety culture and without it, will significantly impact the operation. Too often I have been in operations with the Management Commitment statement posted on a wall, then been given a tour by a member of senior management where they do not wash their hands before entering production, wear a watch in exposed food areas, handle unpackaged product post-kill step and put it back on the line, or take food off the line and eat it in the production area – all in violation of the operation's own Good Manufacturing Practices (GMPs)! I have seen management walk right by employees violating GMPs without commenting or correcting the non-conformances. These actions clearly communicate to employees that food safety is not important.

Necessary resources must be in place to support the food safety plan

Another aspect of management commitment, and unfortunately one that is the most overlooked, is ensuring appropriate resources are in place. Resources include:

- 1) The right number of quality/food safety personnel that are leaders that are empowered to enforce actions on the floor and obtain employee buy-in to food safety,
- 2) Equipment and utensils that are in good condition, in sanitary condition, and easy to clean and sanitize,
- 3) Involvement in the purchase of production equipment, changes in production processes, and changes in processes to maintain a food-safe environment,
- 4) 3rd party training or other learning opportunities for food safety personnel to keep them up to date, and
- 5) The time necessary to complete the numerous tasks involved in maintain the operation's food safety programs.

Top-down, bottom-up communication systems involve the entire operation

Maintaining a food safety culture involves both management and employees. Both top-down and bottom-up communications systems are key. While management may provide adequate resources, models food safety leadership, and communicates the importance of food safety to

employees is critical, it does not guarantee employee buy-in or may lead to situations whereby an employee may devise their own method of doing something that they *think* will protect product but is unsafe or non-compliant with regulations. Therefore, systems must be in place for employees to communicate their observations or ideas to management. These communications should be followed up on so that the employee knows they have been listened to, their comments acknowledged, and any issues addressed. Also, employees should be empowered to communicate issues on the floor (i.e., non-compliances).

A proactive stance to food safety helps prevent adverse events

A food safety culture is proactive. Food safety plans generally include implemented programs, inspections, record reviews, sampling, etc. (proactive), yet often end up being reactive (e.g., following up on non-conformances, tracking incidents, implementing corrective actions, etc.). Proactive activities go further and are meant to prevent these events. This requires an understanding of the risks, an ongoing review of the food safety plan to mitigate those risks, and implementation of preventive actions. This takes time and development, but the more proactive actions that are taken, the less reactive actions will be required.

One observation I have made is that when non-conformances in the operation are noted, a corrective action may be put in place, but a strong preventive action is not developed. For example, too often I see “employee training” as the corrective action for a non-compliance, but I don’t see a preventive action to ensure it doesn’t happen again. If there are repeated GMP violations on the floor perhaps more training is not the solution. Perhaps employees need to be empowered and encouraged to immediately resolve the violation. I like to see situations where an employee points out to another employee that they need to wash their hands again, or that their hairnet is not covering all of their hair, or to pick up their trash that missed the waste receptacle. Employees should also feel empowered to approach unaccompanied strangers in the plant and make sure there is not a breach in the food defense program.

Another example of addressing a non-conformance might be related to metal contamination in a product. Instead of just fixing the piece of equipment that resulted in the contamination, perhaps that part of the equipment should be replaced or shielded or inspected after each run to prevent the incident from occurring again. Sometimes this will trigger the identification of another possible risk point that can be addressed or a necessary change to the food safety plan. When management supports these changes, the company is demonstrating a strong food safety culture.

Results of a food safety culture

Food safety culture is not defined by the fact an operation has all the appropriate food safety programs documented, nor by the fact the company can pass a certification audit. A true food safety culture encompasses

- 1) Robust programs,
- 2) Management commitment,
- 3) Adequate resources,
- 4) Strong communication systems, and

5) A proactive mindset

This will likely require capital investment and increased food safety costs for the medium term, but if nurtured, the food safety culture can ultimately lower costs. Examples include (but are not limited to) decreases in downtime due to well-maintained and sanitary equipment, decreases in labor costs resulting from lower turnover due to employee satisfaction, and decreased risk of a costly recall.

With these benefits, why would you not ensure your company has a strong food safety culture?