

# VCFSA NEWS



Ventura County Food Safety Association

[www.vcfsa.org](http://www.vcfsa.org)

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## FSMA Proposed Rule for Food Traceability

The FDA updated the content of the proposed Traceability Rule on Jan 12. If you haven't reviewed it, find it [here](#).

There is still time to submit your comments. Deadline is Feb 22nd.

## The Evolution of the Food Supply Chain

Supply chain participants are no longer limited to the first-tier supplier, the manufacturer, and the distributor. Today, participants include everyone involved from “farm to fork” in the growing, harvesting, processing, packaging, transporting, holding, and selling of a food product. A participant can have multiple roles within the same supply chain. And it's more than likely one or more ingredients or raw products are sourced from non-domestic entities. Risks to food safety exist along each step of the farm-to-fork continuum.

Many companies—from food and beverage manufacturers to restaurants and food retailers—find it difficult to document their end-to-end supply chains. Yet it's essential to understand the supply chain to meet federal regulations, mitigate risks, and satisfy consumer demands for supply chain transparency. Lack of a holistic view and understanding of potential risks can lead to food safety and quality failures, resulting in damage to a company's—or multiple companies'—brand reputation and bottom line. Companies must understand the challenges they face, and the potential solutions available, to manage food safety risks in today's complex supply chains. ([Deloitte & Touche LLP](#))

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## *Food Safety and Local News*

- The FDA completed the traceback [investigation](#) for the multistate outbreak of E. coli 0157:H7 from the fall of 2020.
- Read about [Microbiological Risk Assessment](#), past, present and future.
- If you're planning on upgrading your machinery or building a new facility, check out the [Definitive Guide to Sanitary and Hygienic Design for Food Equipment Manufacturers](#).
- The USDA appointed new senior staff positions, [see the names](#).
- Resources available to agriculture industry and consumers on Covid-19 are [here](#).
- What those in agriculture can [expect](#) under the Biden Administration.
- If you have college students living away from home, here are some food safety [tips](#) for them.
- Get involved in Ventura County Food Safety Association. [Contact](#) us to see how.

Food Safety Has No Competition

# Top 5 Violations Cited by FDA During FY 2020 Inspections

QA Magazine January 29, 2021

The Food and Drug Administration (FDA) released its annual [Inspection Observation Data](#) for the Fiscal Year (FY) 2020. This data depicts how frequently particular violations were found during FDA food facility inspections between October 2019 and September 2020. The following are the top five violations cited by FDA inspectors in FY 2020.

**1. FSVP Development** Under the Food Safety Modernization Act (FSMA), FDA requires most food importers to develop and maintain Foreign Supplier Verification Programs (FSVPs) for their suppliers. The requirement helps ensure that suppliers remain FDA compliant and are producing goods in a safe manner.

During [FSVP inspections](#), FDA expects importers to present complete FSVPs that adequately assure suppliers' food safety. In FY 2020, FDA cited 514 facilities for failing to develop an FSVP. While most food facility inspections were halted for the majority of 2020 due to the COVID-19 pandemic, FDA [continued to conduct FSVP inspections](#) remotely, and FSVP citations increased by 51% from 2019. This is the third year in a row that failure to develop an FSVP was the top cited inspection violation.

**2. Hazard Analysis** In 2020, FDA cited 104 cases where facilities failed to provide an adequate hazard analysis. FDA requires most food facilities to identify potential biological, chemical or physical hazards that may occur at their facility as well as establish preventive controls for those hazards. This is another way FDA ensures that facilities are maintaining food safety protocols.

These hazards can vary. For example, a facility can identify that it is possible for pathogens to survive processing intended to eliminate them. Alternatively, the facility can identify areas where inadequate cleaning of equipment can lead to allergen cross-contact.

**3. Pest Control** During facility inspections, FDA searches for signs of potential pest infestations. FDA cited 98 facilities for failure to prevent pests within their food facility or for misusing pesticides in a way that could cause potential food contamination.

**4. Manufacturing Controls** Manufacturing, processing, packing and holding controls account for 95 of 2020's food facility citations. This citation indicates that a facility did not conduct operations under conditions that would minimize the chances for potential microorganism growth, allergen cross-contamination or contamination and deterioration of food. FDA requires facilities to provide controlled environments when handling food products to avoid potential health risks to consumers.

**5. Personnel** The fifth-most cited violation during food inspections in FY 2020 were personnel issues. These can include failing to address hygiene issues or other good manufacturing practices in relation to employees handling food products. FDA issued 87 citations for this violation.

**Sanitation Citations** While no sanitation citations made it into the top five on their own, sanitation citations make up a significant portion of the FY 2020 violations when combined.

For example:

- FDA cited seafood processing facilities 81 times for failure to properly monitor their sanitation practices. These could include, but are not limited to, not properly monitoring "safety of water that comes into contact with food, condition and cleanliness of food contact surfaces," or "maintenance of hand washing, hand sanitizing and toilet facilities."

- FDA cited 80 facilities for plant maintenance and sanitation issues. These are the result of failing to maintain a clean and sanitary food facility, which can also pose environmental threats to food products. FDA cited facilities for failing to sanitize their equipment 58 times.

FDA cited facilities 45 times for sanitation of food contact surfaces. This usually means that utensils and other surfaces used in food preparation were not properly cleaned to prevent product contamination.