

## Interview with: Dr. Larry L Hood



Name: Larry L Hood

Title: Managing Director

Organization: Technical And Business Services, LLC

Location: Bridgewater, NJ

Career Assignments: JohnsonDiversey – Mgr, Market Development; Celanese America – Business Director; Johnson & Johnson, Inc. – Dir. Technology; Hagelin & Company, Inc. – President/Flavor Division.

Academics: B.S. Degree, University of Illinois; M.S. and Ph.D. Degrees, Michigan State University.

Activities/Organizations: SQF Institute – Tech. Advisory Committee; Member of International Association of Food Protection; Member of Institute of Food Technologists.

### Introduction

“Ensuring the safety of our products and maintaining the confidence of consumers is the single most important goal of the food and beverage industry.”

So says Jim McCarthy, President and CEO of the Snack Food Association.

And the U.S. government agrees. Under current consideration by the Senate is the FDA Food Safety Modernization Act, which amends the Federal Food, Drug, and Cosmetic Act (FFDCA) to expand the authority of the Secretary of Health and Human Services (the Secretary) to regulate food, and by authorizing the Secretary to suspend the registration of a food facility.

The FDA Food Safety Modernization Act requires each food facility to evaluate hazards and implement preventive controls. It requires the Secretary to: (1) identify preventive programs and practices to promote the safety and security of food; (2) promulgate regulations on sanitary food transportation practices; (3) develop a policy to manage the risk of food allergy and anaphylaxis in schools and early childhood education programs; (4) allocate inspection resources based on the risk profile of food facilities or food; (5) recognize bodies that accredit food testing laboratories; and (6) improve the capacity of the Secretary to track and trace raw agricultural commodities.

The bill also strengthens FDA authority and imposes new fees to cover the cost of re-inspections and food recalls.

Last year, the House of Representatives passed the Food Safety Enhancement Act, which includes similar provisions and would impose new user fees on food manufacturing facilities to help cover the cost of the strengthened food safety program. After Senate passage of the new bill, a House-Senate conference committee will negotiate differences between the two measures and develop a final bill. Once passed, that bill would be sent to President Obama for his expected signature.

What this means is that food providers, from farm to table, should be preparing now to comply with current and proposed regulations. To that end, the Wisconsin Potato & Vegetable Growers Association sponsored an SQF training session conducted by Dr. Larry Hood at the WPVGA Grower Education Conference held in Stevens Point this past February. Hood has also assisted individual potato and vegetable operations with their SQF training programs.

Dr. Hood is presently the managing director and founder of Technical and Business Services, LLC, a food safety consulting company based in New Jersey. TBS is a licensed SQF training center. Dr. Hood is a registered SQF consultant for conventional and high risk categories as well as an OSHA trainer. TBS is serving clients in the North American food supply chain that manufacture or distribute beverages, processed food, dairy products, fresh produce, seafood, baked goods, prepared meals (commissaries), food ingredients, and nutritional supplements.

A graduate of the University of Illinois, Dr. Hood completed graduate degree requirements at Michigan State University with specializations in food microbiology (pathogenic species), thermal processing, and food chemistry (protein structure and function). He has more than 30 years of diversified experience that includes technical and general management assignments within the food and beverage product manufacturing and ingredient supplier sectors. These have included branded organizations such as Quaker Oats, Continental Baking, Johnson & Johnson, Inc., and Celanese-America.

Dr. Hood has been actively involved with helping North American companies implement the Safe Quality Food standard since 2005. He is among the first recognized and registered SQF trainers in North America and he is recognized food safety expert in 19 different categories of food products. He currently serves as a member of the SQF Technical Committee, the SQF 2000 pack house guidance sub-committee, and assists the SQF Institute with its training of auditors. He has delivered numerous presentations on the topic of food safety and has authored more than 30 publications and patents during his career. In the following interview, he shares his views on food safety as well as the issues surrounding SQF audits and certification.

### **What should fresh produce growers know about SQF?**

The Safe Quality Food standard (SQF) is a HACCP-based, food safety and quality standard with international recognition by nearly every retail organization around the globe due to its acceptance and recognition under the Global Food Safety Initiative (GFSI) benchmarking process.

The SQF standard is the only GFSI standard that provides certification for all companies that exist within the food supply chain - from growers, orchards and ranches to manufacturers and processors to wholesale distribution companies. There are two separate codes depending upon whether a company is engaged primarily in growing or in subsequent processing of fresh produce or raw food ingredients. Companies whose primary activity is growing of produce or agricultural raw materials will need to implement the SQF 1000 Code. If the primary activity of a company is further processing of produce or food ingredients (washing, grading, dicing, cutting, cooking, packaging or distributing food) then they will be certified under the SQF 2000 Code.

Both 1000 and 2000 Codes offer the possibility of three levels of certification, which reflect primarily upon the type and extent of food safety and quality risk associated with the food category. These are: – Levels 1, 2, and 3. The essential requirements that a supplier must implement are: Level 1 – all required regulatory and food safety programs such as GMPs and SQF prerequisite programs; Level 2 – a validated HACCP plan; and Level 3 – a validated Food Quality plan.

Implementing the SQF code is a challenging task but achieving certification can be extremely rewarding. When a supplier becomes SQF certified, the company is placed into an on-line database provided by the SQF Institute. This database is searchable by buyers of retail food companies, so certification can result in instant, global recognition and potential increase in sales opportunities. Additionally, once certified under the SQF standard, a supplier may need many less routine food safety audits which seem to be proliferating at a rapid rate. The increase in required 3<sup>rd</sup> party audits by retailers leads to escalating costs and reduced productivity for the supplier. Since the SQF audit is seen as more demanding than many standard food safety audits today, retailer's acceptance of the SQF audit allows a supplier to avoid or consolidate many common 3<sup>rd</sup> party audits.

### **What is a realistic time-frame for achieving certification?**

One of the most frequent questions that people ask about certification is “how long will it take?” This is a very hard question to answer precisely. As a rule of thumb, however, if a company has previous experience with and good success with passing third party audits, it will require about six to nine months to get ready for an SQF audit. If there is little or no third party audit experience, the time could easily be 12 -16 months. Companies in the food supply chain that wish to prepare for an SQF audit should visit the website for the SQF Institute. The abundant free information on this website provides a good starting point for understanding the certification process ([www.sqfi.com](http://www.sqfi.com)). However, there are still many practical details of the certification process that are not revealed by visiting the SQF website or calling the SQF Institute. In such cases, companies may feel free to call or e-mail me (201-370-1636; [larry@sqfguy.com](mailto:larry@sqfguy.com)) or visit our web site: [www.sqftrainingcenter.com](http://www.sqftrainingcenter.com).

## **Who conducts the audits and grants the certification?**

SQF certification is granted following an audit of a supplier's facility and documentation by an independent certification body (the "audit company"). Auditors that conduct the certification audits must work for recognized certification bodies; they may not suggest corrective actions during audits nor may they offer recommendations on how to structure program documentation. Doing so would be a serious conflict of interest to ensuring impartiality in judging whether a supplier has met the requirements of the standard. Rather, the job of an auditor is to search for impartial, objective evidence that the supplier has effectively implemented the SQF program at their location.

Suppliers may undertake the preparation of documents and review of site conditions themselves or they may retain the services of a consulting body. Preparation of documents and verification of the status of the facility is done in-house under the leadership of the in-house expert on the SQF standard called an "SQF Practitioner." Every company seeking certification under the SQF standard must have a trained and qualified Practitioner in order to verify and validate the internal activity required when implementing and maintaining the SQF program. Because of conflicting requirements in operating a food business and meeting a reasonable schedule for passing the SQF audit, the Practitioner may elect to get the assistance of a consultant or training body such as our company. Unlike certification bodies, consultant and/or training bodies can and will provide feedback and advice on best practices needed in written procedures and records that prove the SQF program is in place and effective.

## **What should growers, handler, and distributors of fresh produce know about HACCP?**

Hazardous Analysis Critical Control Points, or HACCP (pronounced "ha-sipp"), is a widely recognized food safety management system. Its purpose is to control, reduce, or eliminate potential food safety risks and prevent them from becoming an actual hazard that leads to injury or illness when food is consumed. Companies that grow or handle fresh produce and who want to be certified under a recognized GFSI standard must meet the requirements of a Level 2 SQF certification. A major step in seeking Level 2 certification is the implementation of effective prerequisite programs and the completion of a food safety risk assessment based upon the HACCP process.

There are 12 steps involved in developing a HACCP plan that ensure the SQF audit requirements are met. These steps are reviewed as part of the training that Practitioners undergo. Following the HACCP risk assessment process (step 6 of the 12 steps), a food company may be able to identify previously unrecognized hazards in their product flow as raw materials are converted into finished and packaged product ready for distribution. Once the risk assessment phase of developing a HACCP program is completed, the company will likely have specific control measures to ensure their product does not become unsafe during handling and packaging. The remaining 12 steps in the HACCP process lead to identification, monitoring, and verification of critical control points. Together the last 7 steps of the HACCP process constitute the "7 principles of HACCP" and when properly implemented, represent scientifically valid steps that can control, reduce, or prevent a hazard from occurring in the finished product. Effective

monitoring and records of compliance with critical control points constitute the proof that the HACCP plan has been implemented effectively.

The SQF Codes require that individual employees who have job assignments that impact directly upon food safety complete HACCP training. This could include anyone in with the following assignments: cleaning and sanitizing food contact equipment and facilities, monitoring of critical control points for food safety, pest control monitoring, maintenance activities, training of employees, waste disposal, and other SQF pre-requisite programs

### **Are there any food safety measures that should be implemented in addition to a HACCP program?**

Failure to monitor and maintain critical control limits in the HACCP program will result in unsafe finished products. Unsafe products that make their way into the food distribution channels may lead to a recall or market withdrawal and regulatory action that can lead to civil or criminal charges. HACCP plans play a major role in helping companies avoid product recalls, however, HACCP plans alone do not ensure a safe product. HACCP plans must be implemented in conjunction with other plant-wide programs, called prerequisites. These are essential activities, performed according to written directions and verified by the Practitioner, that ensure the facility is operated and maintained in a condition to ensure the food is safe to consume. Examples of prerequisite programs include: effective pest control program, employee training and implementation of good manufacturing practices (GMPs), employee hygiene, control of hazardous chemicals, cleaning and sanitation programs, maintenance programs and traceability programs.

Prerequisite programs together with the HACCP plan form a major portion of the food safety plan required for a Level 2 SQF certification. The Level 2 SQF certification meets the needs of the Global Food Safety Initiative (GFSI) standards required by retailers as proof a supplier has an effective food safety program in place. Any supplier that fails to demonstrate an effective implementation of their SQF system at the time of the SQF certification audit will receive one or more nonconformance ratings by the auditor. A certificate cannot be issued until all non-conformances are corrected. Usually, a time limit to correct major nonconformance's (14 days) and minor nonconformance's (30 days) is imposed or a certification body will not issue a certificate to the supplier. An effective food safety plan based upon a valid HACCP risk assessment together with effectively implemented prerequisite programs is a critical element of the recorded documentation required to achieving SQF certification.

### **What is the cost of the certification audit?**

The final cost to become SQF certified is hard to pin down exactly. It depends upon a number of factors, only part of which is the cost for the final certification audit. The total final cost of certification will be impacted by: 1) initial and annual certification registration fees, 2) internal time and cost for developing documentation and records, and 3) the cost of internal and external training.

The all-important cost of conducting the final certification audit is based upon competitive pricing among the certification bodies. The standard SQF audit is usually longer, and therefore proportionally more expensive than the typical 3<sup>rd</sup> part food safety audit. However, companies expecting to undergo an SQF certification audit would do well to get price quotes from several certification bodies. It is recommended that companies also not consider multiyear certification agreements, since the long term trend in audit pricing appears to be down. Secondly, since audit cost is a direct reflection of time on-site by the auditor, food suppliers should carefully compare differences in the audit times among the companies in order to arrive at the best cost.



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Dr. Hood is shown providing SQF training at the WPVGA Grower Education Conference held February 3, 2010 in Stevens Point, WI. SQF is a risk management and preventive system implemented to assure food safety and quality.