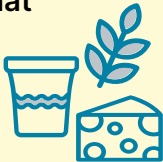


Required Food Safety Training At-a-Glance

Understanding who must be trained, what training is required, when it's required, and what records must be kept.



FDA & USDA: Good Manufacturing Practices (GMPs) (21 CFR 110)	
WHO:	Food handlers and supervisors
WHAT:	<ul style="list-style-type: none">• Employees must know their responsibilities and understand the importance of following established procedures so as to minimize the likelihood of food contamination.• Personnel responsible for identifying sanitation failures or food contamination must have a background of education and/or experience that provides a level of competency necessary for the production of clean and safe food.• Food handlers and supervisors must be trained on proper food handling techniques, food-protection principles, and the dangers of poor personal hygiene and insanitary practices.
WHEN:	Prior to assignment. Retraining should occur when conditions or hazards in the workplace change, with refresher training every two to three years.
WHAT RECORDS:	<ul style="list-style-type: none">• FDA requires GMP training records under 21 CFR Part 117, including documentation of food safety and hygiene training, with records kept for at least two years.• USDA does not require GMP training records under 9 CFR Parts 416 and 417, but they are strongly expected and often reviewed during inspections.

FDA & USDA: Hazard Analysis and Critical Control Point (HACCP) (9 CFR 417)	
WHO:	<ul style="list-style-type: none">• At least one member of the HACCP team (internal or external) must be trained in HACCP.• All employees must be trained prior to beginning employment to use the approved HACCP.
WHAT:	<ul style="list-style-type: none">• Training should provide an overview of HACCP's prevention policy, while focusing on the specifics of the employee's normal functions.• Training must include the identification of food safety procedures, processes that are critical control points, how processes will be monitored, and what corrective actions must be taken when standards are non-compliant or violated.
WHEN:	Prior to assignment. Retraining should occur when conditions or hazards in the workplace change, with refresher training every two to three years.
WHAT RECORDS:	<ul style="list-style-type: none">• FDA requires training records for both juice and seafood HACCP systems.• Training records must be kept and available for FDA inspection. USDA requires training records for those involved in developing, reassessing, and verifying the HACCP plan.

FDA & USDA: Food Safety Modernization Act (FSMA)

WHO:	Companies covered by the Act with personnel assigned to vulnerable areas.
WHAT:	Training must cover the employer's food defense plan.
WHEN:	Prior to initial assignment and when changes are made to the plan.
WHAT RECORDS:	<p>Although not required–</p> <ul style="list-style-type: none"> • Sanitation (9 CFR 416): Training records are strongly recommended to show that employees understand cleaning, sanitation, and hygiene procedures. • HACCP (9 CFR 417.4(a)(8)): Requires HACCP personnel to be trained, and proof is expected during audits or Food Safety Assessments (FSAs). • Slaughter, processing, ready-to-eat operations: FSIS inspectors often request training documentation during inspections, especially when deficiencies are noted.

FDA & USDA: Workplace safety (29 CFR 1910)

WHO:	Food handlers and supervisors.
WHAT:	OSHA regulations such as lockout/tagout, machine guarding, personal protective equipment (PPE), hazard communication, and hearing protection may apply.
WHEN:	Prior to initial assignment. Annual and/or refresher training may apply depending upon topic.
WHAT RECORDS:	Varies by OSHA regulatory area.

FDA: Cleaning and sanitation procedures (21 CFR Part 120, Section 120.6)

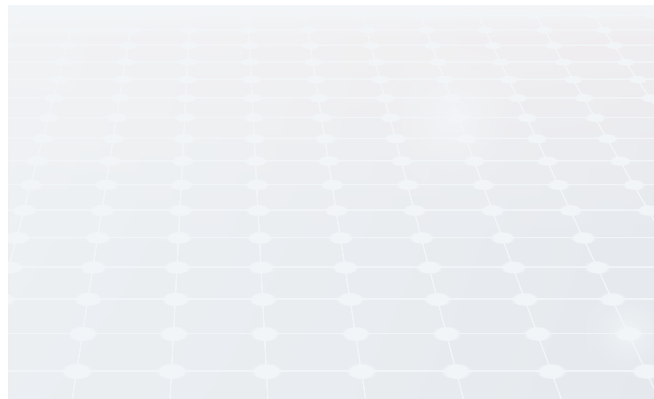
WHO:	Food handlers and supervisors.
WHAT:	Training must address the employer's sanitation standard operating procedure (SSOP) for sanitation conditions and practices before, during, and after food processing.
WHEN:	Prior to assignment. Training needs should be re-evaluated whenever there's a change in a product or food operation.
WHAT RECORDS:	<p>While 120.6 itself does not require training records, training is required under:</p> <p>◆ 21 CFR §120.13 – Training</p> <p>This section mandates that individuals involved in developing and implementing the HACCP system (including SSOPs for cleaning/sanitation) must be:</p> <ul style="list-style-type: none"> - Trained in HACCP principles, and - Qualified to perform assigned tasks. - And training must be documented.

USDA: Cleaning, sanitation, and employee hygiene (9 CFR Part 416)

WHO:	All persons working in contact with product, food-contact surfaces, and product-packaging materials.
WHAT:	Training should address the employer's sanitation standard operating procedures (SSOPs) for sanitation conditions and practices before, during, and after food processing; and cleaning food contact surfaces of facilities, equipment, and utensils. Employee hygiene requirements also must be addressed [§416.5].
WHEN:	Prior to assignment. Training needs should be re-evaluated whenever there's a change in a product or food operation.
WHAT RECORDS:	<p>Even though 9 CFR 416 doesn't spell it out, the USDA expects establishments to:</p> <ul style="list-style-type: none"> • Demonstrate that personnel are trained in their roles (especially those performing sanitation tasks) • Show that employees understand hygiene requirements to prevent product contamination • Support SSOP implementation through documented competency

USDA: National Organic Program (7 CFR Part 205)

WHO:	<ul style="list-style-type: none"> • Employees whose responsibilities involve organic production or handling. • Certification reviewers and inspectors have specific training requirements under 7 CFR 205.501.
WHAT:	Training must be in accordance with the employer's internal control system.
WHEN:	Prior to initial assignment. Training needs should be re-evaluated whenever there's a change in a product or food operation.
WHAT RECORDS:	<ul style="list-style-type: none"> • Certifying agents must maintain current training requirements, training procedures, and training records for all inspectors and certification review personnel. • No record requirements specified for other personnel involved in organic production or handling. • 7 CFR Part 205 does not explicitly require training records, but certifying agents expect to see evidence that staff are trained to implement the Organic System Plan and follow organic standards. Maintaining training documentation is a strong best practice that supports compliance and smooth organic certification audits.



USDA: Food ingredients and sources of radiation (9 CFR Part 424, Subpart C)

WHO:	Key irradiation personnel who monitor or control daily operations.
WHAT:	Training must include food technology, irradiation processing, and radiation health and safety.
WHEN:	Prior to assignment.
WHAT RECORDS:	<ul style="list-style-type: none"> • Certification that key irradiation personnel have been trained in food technology, irradiation processing, and radiation health and safety. • Though not explicitly required in 9 CFR Part 424, training records are highly recommended for employees handling food ingredients or irradiation sources. This ensures that they are trained in safe handling procedures and regulatory compliance. Maintaining records also supports the establishment in case of FSIS inspections or audits.



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