

## From the Food Safety Committee

### Current Good Manufacturing Practices—Warehouse and Distribution

*Ashley Wilson, Stone Brewing, MBAA Food Safety Committee*

Current Good Manufacturing Practices (CFR 21, Part 117, Subpart B) include regulations on the entire beer production process, from employee hygienic practices to warehouse and distribution. While the Warehouse and Distribution subsection is short and sweet, it has a major impact on food safety because it encompasses both the start and end points of the production process. The aim of this section is the safe storage and transportation of food (remember, beer is food!). Below is a direct excerpt from CFR 21, Part 117, Subpart B.

#### Sec. 117.93 Warehousing and Distribution

Storage and transportation of food must be under conditions that will protect against allergen cross-contact and against biological, chemical (including radiological), and physical contamination of food, as well as against deterioration of the food and the container.

What does this mean in a practical sense? Regarding the physical structure of the warehouse, cooler, and transportation vehicles, they must

be well maintained, clean, pest free, and safe for storing food. Cooling systems must be maintained to prevent loss of cooling capability, as well as to prevent leaks from cooling units into food storage areas.

Routine cleaning tasks, whether handled internally or by a third party, must be performed and recorded in a log. Employees must be trained on special handling and storage requirements for all raw materials and pay special attention to sensitive products, such as allergens, juices, spices, hops, grains, and temperature- or moisture-sensitive raw materials.

Allergen control is another important consideration for warehouse and distribution teams. Allergen control means that there are procedures in place to ensure the separation of allergenic and nonallergenic raw materials and products. If there is a possibility of cross-contamination, adequate steps should be taken to separate allergenic substances by physical or other effective means.

#### Ask the Food Safety Team

Ever have a food safety question you don't know the answer to or for which you would like a second opinion? The Food Safety team is there to help! Just post your question in the "Ask the Brewmasters" section of the community site, and the Master Brewers Food Safety Committee will weigh in or get another expert's answer for you!