

From the Food Safety Committee

Best Practices for Recordkeeping in a Brewery: Ensuring Food Safety and Regulatory Compliance

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As a brewery, ensuring food safety and compliance with regulatory requirements is of utmost importance. Proper recordkeeping is one important aspect of achieving these goals. Accurate and comprehensive recordkeeping not only helps you manage operations effectively, but it also plays a vital role in maintaining food safety standards and complying with legal and regulatory requirements. Additionally, records must be available for review by FDA inspectors. Here are some best practices for recordkeeping in a brewery.

- 1. Implement a Robust Food Safety Plan:** Develop and implement a comprehensive food safety plan that includes recordkeeping procedures. This plan should cover all aspects of your brewery operations that impact food safety, such as ingredient storage, handling, and processing; cleaning and sanitation; traceability exercises; and employee training. Ensure that your food safety plan is in compliance with applicable regulatory requirements, such as the Food Safety Modernization Act (FSMA) in the United States or equivalent regulations in other countries.
- 2. Maintain Detailed Sanitation Records:** Proper sanitation is critical in a brewery to prevent contamination and ensure food safety and quality. Maintain detailed records of all cleaning and sanitation activities, including the cleaning schedules, cleaning procedures, sanitizers used, and verification checks. Sanitizers used for food-contact surfaces must be food grade. These records are important for monitoring the effectiveness of your sanitation program and demonstrating compliance with food safety regulations.
- 3. Record Ingredient Information:** Keep accurate records of all incoming ingredients, including their source, lot number, and expiration date. These records are essential for traceability in case of any product recall or quality issue and for complying with labeling requirements. Supplier approval programs are helpful.
- 4. Document Recipe Formulations:** Maintain detailed records of your recipe formulations, including the type and quantity of each ingredient used, batch size, and any modifications made. These records are important for ensuring product consistency, managing inventory, and complying with labeling requirements.
- 5. Monitor and Document Critical Control Points:** If your brewery follows hazard analysis and critical control point (HACCP) principles or other food safety management systems, ensure that you monitor and document all critical control points (CCPs). These may include temperature checks, pH measurements, or other critical parameters that impact food safety. Accurate and timely documentation of CCPs is essential for identifying and addressing any food safety hazards and maintaining compliance with food safety regulations.
- 6. Retain Records for Appropriate Timeframes:** Understand the required retention periods for different types of records and ensure that you retain records for the appropriate length of time. This may include retaining records related to food safety plans, sanitation activities, ingredient information, and recipe formulations. Develop a record retention policy that outlines the specific retention periods for each type of record and ensures compliance with food safety and regulatory requirements. As of November 2023, the requirement for record retention listed in Title 21 CFR Part 117 Subpart F states that all records must be retained at the facility for at least two years after the date that they were prepared.
- 7. Conduct Regular Internal Audits:** Conduct regular internal audits of your recordkeeping practices to ensure compliance with food safety requirements. Food safety requirements may change periodically, so it is important to review them regularly to ensure your recordkeeping practices are still compliant. These audits should cover all aspects of recordkeeping, including data accuracy, completeness, and retention. Identify any areas that require improvement and take corrective actions as needed to maintain compliance and continuously improve your recordkeeping practices.
- 8. Provide Ongoing Employee Training:** Properly train your employees on the importance of recordkeeping, especially in the context of food safety and compliance. Provide regular training on recordkeeping procedures, data accuracy, and the significance of maintaining complete and up-to-date records. Foster a culture of accountability among your team members to ensure that recordkeeping is given the attention it deserves.

In conclusion, effective recordkeeping is essential for ensuring food safety and regulatory compliance in a brewery. By implementing a robust food safety plan; maintaining detailed records of sanitation activities, ingredient information, recipe formulations, and CCPs; and retaining records for appropriate timeframes, breweries can demonstrate compliance with food safety regulations and manage operations effectively.

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!