



Food Safety Bites

By the MBAA Food Safety Committee

Feb - 2021

Current Good Manufacturing Practices - Personnel

What are Current Good Manufacturing Practices (cGMPs) and why do we follow them?

Current Good Manufacturing Practices are a set of standards used to determine if a manufacturer is maintaining practices set by federal, state, and county regulations and include industry recommendations. The US Food and Drug Administration (FDA) regulations require all breweries to have an active cGMP program in place under the Food Safety Modernization Act (FSMA). Under FSMA, beer is considered food. cGMPs are outlined under the FDA's [Code of Federal Regulations 21 Part 117 Subpart B](#). There are eight sections within Part 117 Subpart B that include subjects such as employee hygiene, facility construction and design, and process control. This bulletin will focus on the first section: §117.10 – Personnel.

21 CFR Part 117 Subpart B Section 117.10: Personnel

Part 117 – Current Good Manufacturing Practices, Hazard Analysis, and Risk-based Preventative Controls for Human Food
Subpart B - Current Good Manufacturing Practice
Section 117.10 - Personnel

The key concepts covered in the Personnel section are very simple: control the spread of disease and maintain personal cleanliness in order to protect against the contamination of food.

A) Disease Control

The language of this section is aimed at keeping human pathogens away from the production space by not allowing employees with certain illnesses or injuries to report to work.

Employees are required to tell their Supervisor if they are sick prior to entering the production environment and Supervisors are responsible for excluding or restricting the affected employee.

Employee's experiencing vomiting or diarrhea with a reasonable possibility of food poisoning must be excluded (not allowed at work) from the entire production site.

Employee's experiencing the following may not work in the production environment and must be reassigned or sent home:

- Sore throat and fever
- Persistent sneezing, coughing, or a runny nose
- Open wounds must be securely covered or the employee must be reassigned

B) Cleanliness and Hygienic Practices

To protect against the contamination of beer, all employees working in direct contact with food, food-contact surfaces, and food packaging materials shall conform to hygienic practices. This includes:

- Maintain adequate personal cleanliness.



Food Safety Bites

By the MBAA Food Safety Committee

Feb - 2021

- Wear clean clothes.
 - Free of soil, dirt, debris, or other containments
 - Free of rips or tears that expose skin that would normally be protected
- Remove, cover, or otherwise secure all jewelry on hands or arms.
 - Includes watches, medical alert bracelets, and rings other than a simple, plain band.
- Wash hands thoroughly before starting work, after each absence from the workstation, and at any other time when hands may become soiled or contaminated.
- Glove hygiene: Wearing single-use gloves while handling food and food-contact materials is a good practice, although it is not a replacement for properly washing hands and maintaining good hygiene.
 - Single-use gloves must be clean
 - Replace them if they become soiled
- Hair restraint: Employees must wear effective hair restraints during any activity where product is exposed. Beards or mustaches of lengths 0.25 inch (6mm) or greater require beard covers to cover any exposed facial hair. This includes activities such as:
 - Emptying sacks of grain into the grain transport system
 - Adding ingredients to the brewing vessels
 - Adding ingredients to the filtration mixing tanks
 - Adding hops or ingredients to storage tanks
 - Adding crowns to the crowner hoppers or can lids to the magazine sleeve
 - Working on the packaging lines where there are depalletized, unsealed cans/bottles
 - Working on the packaging lines post-rinser through the crowner/seamer
 - Adding yeast to the yeast brinks

C) Personal Items and Restricted Activities

The following items and activities are prohibited in all production areas:

- Storing personal items such as extra clothes, shoes, and personal electronics.
 - Store personal items in the locker room, breakroom, or at your desk away from the production floor.
- Chewing gum and tobacco are only permitted in designated areas away from the production areas.
- Food and beverage
 - No solid food is allowed on the production floor.
 - Beverages are permitted only if they are in sealed containers with spill-proof design.

Resources

- [21 CFR Part 117 Subpart B Section 117.10: Personnel](#)
- [FDA Food Code 2017](#)
- [Master Brewers - Minimum Standard GBPs for Breweries](#)
- [Brewers Association – Food Safety Planning for Craft Brewers](#)
- [Brewers Association – GMP Checklist – Personnel](#)



Food Safety Bites

By the MBAA Food Safety Committee

Feb - 2021