



HARPC Overview

The Food Safety Modernization Act regulations require that you conduct and document a Hazard Analysis and Risk-Based Preventive Controls (HARPC) (21 CFR 117 Subpart C). This is a formal consideration of the food safety hazards in your food/beverage gas and includes hazards that your supplier may have passed on to you. The HARPC regulations have requirements for development of a Food Safety Plan, risk analysis, training for the persons administering the program, periodic verification and validation of the plan, etc.

The FDA has developed and continues to roll-out guidance for industry to implement the regulations. As the agency develops additional guidance for implementing HARPC, you may need to review and revise your existing plans.

The Food Safety Modernization Act contains an important HARPC exemption for small businesses ("qualified facility"). Contact tom@asteriskllc.com to see if you qualify for the exemption.

Your HARPC Implementation Schedule

The FDA has published the compliance schedule for the Food Safety Modernization Act. [Click here for the final rule and schedule.](#)

The compliance dates are staggered – depending on the size of your business:

- **"Very small businesses"** - If your sales of **food gases** are under a million dollars per year, you will have three years to be in compliance. The compliance deadline is 9/17/2018.
- **"Small businesses"** - If you have fewer than 500 employees, you will have two years to be in compliance. The compliance deadline is 9/17/2017.
- **"All other businesses"** - You will have one year to be in compliance. The compliance deadline is 9/17/2016.

We have pre-developed sample Food Safety Plans, Written Procedures, Training Programs, and HARPC's for your consideration. These HARPC's cover CO₂ cylinder filling, CO₂ mini-bulk, other high pressure gases and mixtures.

Please direct questions or requests for sample procedures/white papers to:
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