



Brand Owner Management Set-up Services (Food) Action Items

Requirements	Scope	Action Items
CFR Subpart L - Foreign Supplier Verification Programs for Food Importers (if applicable) § 1.502 What foreign supplier verification program (FSVP) must I have?	Foreign Supplier Verification Program	Collect/Provide Records
		Assess
		Draft
		Review
		Approve
		Implement
	Foreign Supplier Verification Requirement Program	Develop
		Maintain
		Follow
		Implement
		Implement preventive controls
		Implement a risk-based supply-chain program
	Food Defense Plan Form	Assess the facility
		Draft the Food Defense Plan
		Key Activity Type Vulnerability Assessment
		Draft Food Defense Challenge
	Management of Suppliers of Raw Materials and Packaging Records	Implement Food Defense Challenge
		Provide/Collect Supplier Register
		Provide/Collect Raw Material Register
		Provide/Collect Packaging Material Register
		Review Supplier Register
		Review Raw Material Register
	Temporary FSVP Policy for Emergency Suppliers	Review Packaging Material Register
Identify		
Assess		
Draft the Program, Policy, Procedure		
Review		
Approve		
Ingredients, Raw Materials, Products Foreign Supplier Importer Evaluation Form	Implement	
	Provide/Collect Records	
	Identify	
	Assess	
	Draft the Program, Policy, Procedure	
	Review	
21 CFR 117 Subpart G - Supply Chain Program 117.410 General requirements applicable to a supply-chain program.	Approve	
	Implement	
	Collect/Provide Records	
	Assess	
	Draft	
	Review	
21 CFR 121.130 Vulnerability assessment to identify significant vulnerabilities and actionable	Food Fraud Vulnerability Assessment (Supplier and Ingredient)	Approve
		Implement
		Collect/Provide Records
		Assess
		Draft



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Identify significant vulnerabilities and actionable process steps.	Program	Review Approve Implement
21 CFR 117.139 Recall plan.	Product Withdrawal and Recall Program	Collect/Provide Records Assess Draft Review Approve Implement
21 CFR 117.435 Onsite audit.	Internal Audit Checklist for Co-Manufacturer Program	Collect/Provide Records Assess Draft Review Approve Implement
21 CFR 117.475. Specifications Program	Specifications Management (Finished Product, Raw Materials, Co-Manufacturer)	Collect/Provide Records Assess Draft Review Approve Implement
21 CFR 117.315 Requirements for record retention.	Records Management Program	Collect/Provide Records Assess Draft Review Approve Implement
21 CFR 117.410(e) General requirements applicable to a supply-chain program.	Customer Complaint Program	Collect/Provide Records Assess Draft Review Approve Implement
21 CFR 101.3 Identity labeling of food in packaged form.	Label Management/Product Identification Program	Collect/Provide Records Assess Draft Review Approve Implement
21 CFR 1.1315 Traceability Plan, FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods	Traceability Program	Collect/Provide Records Assess Draft Review Approve Implement
21 CFR 117.335 Special requirements applicable to a written assurance	Co-Manufacturing Management (Quality/Contract Agreement)	Collect/Provide Records Assess Draft Review



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		Approve
		Implement
21 CFR 117.126 Food safety plan.	Food Safety Plan/HACCP Plan	Collect/Provide Records
		Assess
		Draft
		Review
		Approve
		Implement
21 USC 301 Food Safety and Security Strategy.	Crisis Management Program	Collect/Provide Records
		Assess
		Draft
		Review
		Approve
		Implement
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