



Master Brewers Food Bites



From the Food Safety Committee

Training in the Brewery: A Food Safety Fundamental

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Training is a fundamental part of brewery operations and a critical requirement for your food safety plan. In addition to adhering to regulatory requirements and serving as proof for third-party or regulatory audits, training sets your team up for success by giving them the knowledge of what to do and why to do it. Providing the why is critical to building a culture of safety and quality and empowering team members to understand and own their role in food and beverage production. When food safety culture is strong, team members think about product safety first, and unprompted, they keep consumer safety top of mind, make risk-based decisions, and take risk-based actions. This Food Safety Bite will walk you through the key components of training and provide you with resources to help you get started or take your training to the next level.

Who

Everyone receives training on a variety of topics, including, but not limited to, all of the policies and SOPs that apply to their role, their job duties, and some topics that apply to everyone, such as Good Manufacturing Practices (GMPs).

Who conducts the training? The trainer may vary based on the topic or function being trained. Generally, any party with demonstrated knowledge can train people in that knowledge. This is often team leadership, members of the Food Safety/HACCP team, a safety or food safety manager, Human Resources staff, etc. Trainers can also be from outside the company, such as consultants, online classes, or third-party companies contracted to run training either on- or off-site.

One key thing to remember is don't have one person or one team conduct all of your training. A variety of voices is more powerful than just one or two. Trainees will eventually grow fatigued from having a single trainer.

What

Everyone needs to know the fundamentals, including, but not necessarily limited to, GMPs, basic food safety understanding, an overview of the site's prerequisite programs, and the site's critical control points (CCPs) and process controls. Remember, if a policy or SOP applies to someone, they need to know it.

Every person in your organization also needs to receive role-specific training. Team members must be trained in their job duties. For example, if you have pasteurization as a CCP, then the team members operating the pasteurizer and the team members running data loggers through it for verification testing will need to be trained on how to do those things. As another example, if a team member's job includes sampling from tanks

and testing the gravity of a sample, they need to be trained on all parts of that task.

Additionally, team members who join the HACCP team or Food Safety Team need to demonstrate understanding of HACCP principles, ideally, although not required, from a 2-day HACCP course. In addition, if the preventive controls for human food (PCFH) rule applies to your brewery, then demonstrated knowledge of the rule is required by the FDA (more information on whether the PCFH rule applies to you can be found [here](#))—this can be achieved through demonstrated knowledge and experience and/or through specific preventive controls qualified individual (PCQI) training ([21 CFR 117.180\(c\)](#)).

When

Training should take place throughout a team member's time at the brewery:

- Start early with onboarding, food safety fundamentals, and initial job duty training to build the foundation of your culture of safety and empowerment.
- Continue a team member's training as new policies become relevant to their role, as new policies and updates are rolled out in the brewery, and as they expand their job duties.
- Provide refresher training to keep best practices top of mind. Each brewery will set its own refresher frequency, but annual training is common. Refresher training also can serve as an effective corrective action if there are deviations from SOPs or policies. Take advantage of "all company" meeting times, as they are great opportunities to conduct refresher training.

Always follow up after training, no matter whether it is the first time or a refresh. Consistently following up to see how team members are integrating training into their behavior is key to verifying that your training was effective. It also reinforces that training matters and is an opportunity for the trainer to be present to answer questions and receive feedback for improving the training program. Visit the team members where they work to perform this check—they may have great suggestions but struggle to find time to seek you out. Be there to hear them.

Where

It is ideal to train in person and where the SOP happens or in the area where the policy applies, as it allows for real-world and hands-on examples in the moment, but this isn't always possible. Here are some pros and cons to different training environments and formats.

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 [MBAA Food Safety Community of Practice](#), and the MBAA Food Safety Committee will weigh in or get another expert's answer for you!

- In person—In a training room or where the activity happens
 - Pro: Interaction with trainees. Can modify delivery in the moment if comprehension or attention is waning. Allows for hands-on examples.
 - Con: Can be difficult to schedule production teams. Can take more of the trainer's time. Depending on the location, it can be hard to hear everyone, and there can be potential safety concerns.
- Online—Live
 - Pro: Useful for employees who work remotely for most of their job duties (e.g., sales team.) Offers a chance for trainer–trainee interaction. Can modify delivery in the moment if comprehension or attention is waning.
 - Con: Can be difficult to schedule remote teams as a group. Can take more of the trainer's time. Fewer opportunities for interaction and hands-on activities.
- Recorded—Custom to your brewery
 - Pro: Ultimate scheduling flexibility. Takes least amount of trainer's time once training is recorded and edited.
 - Con: Least interactive. Need to ensure computer access. Takes more up-front time to record, edit, and keep updated.
- Third-party online resources
 - Pro: Best for topics that are uniform across many sites—for example, good value for HACCP, PCQI, etc.
 - Con: Can be difficult to find one-size-fits-all training for a brewery's food safety policies.

Every brewery is different, and you might identify additional or different pros and cons. Choose what works best for your team.

How

Regardless of where you conduct the training, if it is in-person, plan to have interactive elements and examples with which the trainees can engage. Here are a few examples:

- On-the-floor packaging quality training: Together examine pallets to look for defects or tear boxes to check for proper glue adhesion rather than just showing pictures in a presentation.
- Classroom-style allergen storage training: Create a hands-on exercise that mimics what would happen in the warehouse, with pictures representing allergen and nonallergen products and a grid representing storage racking. Shuffle the pictures for each trainee, and have the team rearrange the “warehouse” to comply with the SOP in picture-form.
- Classroom-style GMP training: Present an image and ask the trainees to point out all the GMP violations and suggest how they can be corrected.
- For any style of training, you can also include quizzes to help gauge trainee attention and comprehension throughout or at the end of training.

There are multiple ways to keep your team up-to-date with refresher training. This includes long-form style classroom or on-the-floor training, but it can also be incorporated into

- All-hands meetings as short reminders (think five to six sentences).
- Posters on the company bulletin board.
- Monthly brief toolbox-style talks, and more.

While these methods aren't always as interactive, they keep the information in front of team members and top of mind throughout the year, not just during designated training times.

Aside from interaction, there are additional elements that can make your training more effective:

- Be animated and energetic: A dry presenter who seems like they would be happier anywhere else will make your trainees feel like the topic is not important and that they would also be happier anywhere else. Show that you care and are invested in the topic, the training, and the trainees.
- Customize for your audience: While not every trainer is multilingual, explore options to make training more accessible for trainees whose primary language may differ from yours. Also, everyone has different learning styles and motivations, so you may need to change your approach to the topic mid-training. Tie the training topic back to what the trainees do and care about at work. What connects with one team member about allergen storage and handling policies might be different from what connects with another. For example:
 - The CEO may care about the overall budget—adherence mitigates potential cross-contact, meaning no money wasted on replacing adulterated goods.
 - The forklift operator may care about how efficiently they can store and pick products—adherence means not having to hunt for storage locations since products have defined areas, keeping loading and unloading times down.

Recordkeeping

Recordkeeping is fundamental, because if there is no record then there is no proof it happened. This is true for third-party auditors (whether they are auditors you hire or the FDA) and your own internal inspectors and auditors.

Training records will often include an employee training policy. This policy will cover, but is not limited to, who will receive training, the topics (or types of topics) they will be trained on, and the general frequency of the training.

You also will want a record from each training session that takes place. For example:

- Electronic or paper quiz results.
- A “sign-in” sheet for trainees to sign at the end of training.
- A training checklist with multiple SOPs, tasks, etc. listed, which the trainee and trainer will initial and date once a task has been successfully trained and performed.

This record should capture the training topic, date of the training, trainer name, trainee name(s), and the trainer and trainee signatures/initials. These forms also may include a statement of acknowledgement and understanding for the trainee to sign.

A database or spreadsheet cataloging your training activities can help you check when yearly training is due, quickly verify if all team members have had their basic training, and show a third-party auditor what training activities have taken place.

Conclusions

A deliberately designed training program sets team members and the brewery up for success by giving team members knowledge of their role, context on why it matters, and empowers and encourages them to be part of the brewery's overall culture of safety and quality.

Additional Resources

[11-Part Series on Food Safety Culture from the Alliance to Stop Foodborne Illness](#)

[Brewer's Association Crafting a Training Program](#)

[Neogen Educational Webinar Series—Success Factors for Developing and Implementing Effective Food Safety Training Programs](#)