

Good Manufacturing Practices (GMPs)

What are GMPs?

Good Manufacturing Practices (GMPs) are the set of standards used to determine if a manufacturer is maintaining practices set by federal, state and county regulations. GMPs include industry recommendations. These easy to understand and execute standards allow companies to operate in confidence that their facility is acting in good faith to satisfy requirements from any regulatory body that may come and inspect the facility. Current U.S. Food and Drug Administration (FDA) regulations require all breweries to have an active GMP program in place.

GMPs cover various subjects. Good Manufacturing Practices for Craft Brewers (GMPCBs) are representative of standards needed for brewing facilities. There are more GMPs for other types of food and beverage manufacturing plants.

GMPCBs include establishing strong quality management systems, obtaining appropriate quality raw materials, establishing standard operating procedures, detecting and investigating product quality deviations, maintaining reliable laboratory tests, meeting sanitary and processing requirements, and packaging and labeling according to approved standards. GMPCBs help to prevent contamination, mixups, deviations, failures and errors and are the foundation for any brewery's quality assurance program.

These standards help to audit the facility, are set in checklist form, and are organized under these topics:

- Plants and Grounds
- Equipment and Utensils
- Sanitary Facilities and Controls
- Sanitary Operations
- Processes and Controls
- Personnel

These standards will help keep the facility clean, safe and pest-free as well as ensure good employee hygiene.

What is HACCP?

Hazard Analysis and Critical Control Point (HACCP) is a management system in which food safety is addressed through the analysis and control of biological, chemical and physical hazards from raw material production including procurement and handling, manufacturing, distribution, and consumption of the finished product. HACCP is designed for use in all segments of the food industry from growing, harvesting, processing, manufacturing, distributing and merchandising to preparing food for consumption. Prerequisite programs such as GMPCBs are an essential foundation for the development and implementation of successful HACCP plans.

The U.S. FDA does not currently require breweries to have HACCP in place. However, it is strongly recommended that a robust HACCP plan should be a routine part of all breweries' standard operating procedures.

This document was created by the Quality subcommittee to the Technical Committee of the Brewers Association to help all American brewers maintain good practices that comply with regulations as well as create a safe and pride-filled workplace. The Master Brewers Association of the Americas has produced a similar set of parameters referred to as Good Brewing Practices. Though another good reference, this piece is not meant to have exact parity.

Why Good Manufacturing Practices for Craft Brewers are Necessary

Good Manufacturing Practices for Craft Brewers (GMPCBs) are the foundation for all quality, food safety and organizational initiatives in any brewery. GMPCBs should be clearly defined and established before a brewery begins production, regardless of production volume. They require continual improvement and ongoing employee education.

GMPCBs are a critical aspect of any brewery environment for the following reasons:

- They are required for all food and beverage manufacturers of any size by the United States Food and Drug Administration (FDA) and can also be enforced by state and/or local health departments.
- They establish clear guidelines for the hygiene and cleanliness of the workers and their workplace.
- They are the foundation of any quality or food safety program in any manufacturing setting.
- They dramatically decrease the food safety risk for the brewery's customers.
- They are easy to execute and maintain.

Failure to implement GMPCBs can result in the following outcomes:

- Penalties for noncompliance with FDA requirements to institute GMPCBs can range from the
 issuance of a letter notifying the brewery of a violation and requesting correction, to criminal
 prosecution of the individual or firm. Other FDA regulatory actions can include seizure of
 products, injunctions to refrain from production, and criminal fines.
- Publicity associated with an FDA enforcement action or a product recall created by a lack of GMPCBs can result in decreased public confidence and loss of income.

Implementation of Good Manufacturing Practices for Craft Brewers will instill a sense of pride and ownership in both the brewery's work environment and its standing in the community.

