

**Conference for Food Protection
2012 Issue Form**

**Internal Number: 117
Issue: 2012 I-013**

Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

All information above the line is for conference use only.

Title:

HACCP-based Guidance for Meat and Poultry Processing at Retail

Issue you would like the Conference to consider:

The Food Safety and Inspection Service (FSIS), in collaboration with the Association of Food and Drug Officials (AFDO), is seeking input on comprehensive Hazard Analysis Critical Control Points (HACCP) guidance materials under development to assist in providing a uniform standard available for all regulatory jurisdictions to control meat and poultry processing activities at retail when a variance is required. This guidance is intended for developing or reviewing HACCP plans for multifaceted processing activities at retail (i.e., smoked, cured, fermented, jerky). Guidance materials previously developed by the Minnesota Department of Agriculture (DOA) are being further developed by FSIS and AFDO into comprehensive HACCP guidance materials to assist all regulatory jurisdictions in complying with FDA Food Code variance requirements.

[i] FSIS and AFDO jointly recommend that a Committee be formed so that input can be received from a wide variety of backgrounds on the guidance under development. By forming a Committee, this would ensure that this guidance provides acceptable, ready-to-use materials available to all regulatory jurisdictions to strengthen their control of meat and poultry processing at retail by utilizing HACCP-based guidance to meet variance requirements. Also, by forming a Committee, this will assure that input is received from a wide variety of backgrounds so that the guidance under development provides suitable guidance materials to control meat and poultry processing activities at retail when a variance is required.

[i] Minnesota Department of Agriculture. *Model HACCP Plans*, and *A Retail Food Establishment Guide for Developing a HACCP Plan*. Links are found at:

[https://docs.google.com/open?](https://docs.google.com/open?id=0ByXV4y__bb1JMMQ3ZTFhODAtNzk0MC00MDExLTk5NTktYTgyMTA3NWUzNTk3)

[id=0ByXV4y__bb1JMMQ3ZTFhODAtNzk0MC00MDExLTk5NTktYTgyMTA3NWUzNTk3](https://docs.google.com/open?id=0ByXV4y__bb1JMMQ3ZTFhODAtNzk0MC00MDExLTk5NTktYTgyMTA3NWUzNTk3)

[https://docs.google.com/open?](https://docs.google.com/open?id=0ByXV4y__bb1JNDM0NmQ4ZTEtNmYxNy00NzZhLTk1NTgtM2RjM2E3OTEzOTQ3)

[id=0ByXV4y__bb1JNDM0NmQ4ZTEtNmYxNy00NzZhLTk1NTgtM2RjM2E3OTEzOTQ3](https://docs.google.com/open?id=0ByXV4y__bb1JNDM0NmQ4ZTEtNmYxNy00NzZhLTk1NTgtM2RjM2E3OTEzOTQ3)

Public Health Significance:

Some retail processing activities under the Food Code (as per § 3-502.11 Variance Requirement), including much of the meat and poultry processing, would require a variance based on a HACCP plan. However, relatively few state and local jurisdictions have

procedures in place requiring that retailers have variances based on HACCP plans. FSIS believes that more guidance is needed on the preparation of HACCP Plans and HACCP-based variance requirements for multifaceted processing activities (i.e., smoked, cured, fermented, jerky), and currently available guidance is inadequate. In developing HACCP plans for meat and poultry processes, retail establishments must consider all possible hazards in accordance with Title 9 CFR 417.2 Hazard Analysis and Critical Control Point (HACCP) Systems.[i] Part 417.2 addresses pathogens of public health concern. Retail establishments are important settings for foodborne-disease outbreaks. If retail establishments do not address pathogen reduction in their HACCP plans, adulterated product may be released into commerce.

In accordance with the preface of the Food Code under "Advantages of Uniform Standards," a retail establishment may be granted a variance from their regulatory jurisdiction to use a specific federal food safety performance standard for a product or a process instead of compliance with applicable provisions in the Food Code. To show compliance with the federal performance standard, however, the retail establishment must demonstrate that processing controls are in place to ensure that the standard is being met similar to a federally inspected establishment. Therefore, a retail establishment's request for a variance based on a federal performance standard must be supported by a validated HACCP plan with record keeping and documented verification being made available to their regulatory jurisdiction.

All regulatory jurisdictions can strengthen their control of meat and poultry processing at retail by utilizing HACCP-based variance requirements if there were available ready-to-use guidance materials on how to accomplish this. While state and local jurisdictions would be the primary audience, such guidance can also be used by retailers to assist in developing their HACCP plans, as they would be able to learn what would be the expectations of their regulators. By forming a Committee, this will assure that input is received from a wide variety of backgrounds so that the guidance under development provides suitable guidance materials to control meat and poultry processing activities at retail when a variance is required.

[ii] Lynch, M., J. Painter, R. Woodruff, and C. Braden. 2006. Centers for Disease Control and Prevention. Surveillance for foodborne-disease outbreaks-United States, 1998-2002. *MMWR Surveill. Summ.* 55(SS10):1-42. Found at: <http://www.cdc.gov/mmwr/preview/mmwrhtml/ss5510a1.htm>

Recommended Solution: The Conference recommends...:

1. That a Committee be established to:

- (a) provide input on comprehensive Hazard Analysis Critical Control Point (HACCP) guidance materials under development by the Food Safety and Inspection Service (FSIS), in collaboration with the Association of Food And Drug Officials (AFDO),
- (b) to assist in providing a uniform standard available for all regulatory jurisdictions in the evaluation of variance requests involving the processing of meat and poultry at retail, and
- (c) to better control meat and poultry processing activities at retail, utilizing the attached guidance materials that are being further developed by FSIS and AFDO, *Model HACCP Plans for Retail Processing*, and *A Retail Food Establishment Guide for Developing a HACCP Plan - Meeting the Requirements of the FDA Food Code Variance in the Relation to Specialized Meat and Poultry Processing Methods*),
- (d) report back to the 2014 Biennial Meeting.

2. That the Conference send a letter to FDA asking that they consider if and how these guidance materials, once finalized, can best be incorporated into:

(a) FDA Food Code Annex 2 (References, Part 3 - Supportive Documents);

(b) FDA Food Code Annex 4 (Management of Food Practices - Achieving Active Managerial Control of Foodborne Illness Risk Factors), and

(c) FDA's two HACCP Manual "Managing Food Safety ; A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments," and "Managing Food Safety: A Regulator's Manual for Applying HACCP Principles to Risk-Based Retail and Food Service Inspections and Evaluating Voluntary Food Safety Management Systems")

Submitter Information:

Name: John Hicks

Organization: USDA/FSIS

Address: Address: Stop Code 3782, Patriot's Plaza III, 8-163A, 1400 Independence Avenue, S.W.

City/State/Zip: Washington, DC 20250

Telephone: 301-504-0840 Fax:

E-mail: john.hicks@fssis.usda.gov

Attachments:

- "HACCP Development for Retail Processing_1"
- "HACCP Development for Retail Processing_2"
- "HACCP Development for Retail Processing_3"
- "HACCP Development for Retail Processing_4"
- "HACCP Development for Retail Processing_5"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.