**Conference for Food Protection**

**2018 Issue Form**

**Issue: 2018 II-015**

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| **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:**

PSC 4 - Amend VNRFRPS Standard 3, Inspections Based on HACCP Principles

**Recommended Solution: The Conference recommends...:**

that a letter be sent to the FDA requesting that the Voluntary National Retail Food Regulatory Program Standards (VNRFRPS), Standard 3 - Inspection Program Based on HACCP Principles be amended as follows (language to be deleted is in strikethrough format; language to be added is underlined):

**1. Add an additional asterisk comment to Program Management, item 4:**

4) Develops and implements a program policy \*\*\* that requires:

a) On-site corrective actions\* as appropriate to the type of violation.

b) Discussion of long-term control\*\* of risk factor options, and

c) Follow-up activities.

\*\*\* Consideration of the elements outlined in Standard 4 will ensure a strong foundation for a quality and uniform inspection program.

**2. Correct misspellings of the word "policies" under Description of Requirement, items 5 and 6:**

5) Establishes and implements written ~~polices~~ policies addressing code variance requests related to risk factors and interventions.

6) Establishes written ~~polices~~ policies regarding the verification and validation of HACCP plans when a plan is required by the code.

A draft revision to Standard 3 is attached to Issue titled: "Report - Program Standards Committee (PSC)"; see content document titled: "Std 3 Proposed Changes"

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.