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## February Newsletter

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## Training Opportunities

### [Developing and Implementing SQF Systems](#)

March 23-24, Philadelphia, PA  
April 18-19, Stillwater, OK

### [Basic HACCP](#)

March 21-22, Philadelphia, PA  
FSIS – May 3-4, Greer, SC

### [Advanced HACCP](#)

April 18-19, Fayetteville, AR

### [Developing and Implementing HACCP Plans and SQF Systems](#)

March 21-24, Philadelphia, PA

### [Listeria Control](#)

### [FSPCA Preventive Controls – PCQI](#)

March 14-16, Fayetteville, AR  
March 15-17, Littleton, MA  
May 23-25, Fayetteville, AR  
May 25-27, Monterrey, Mexico  
September 19-21, Fayetteville, AR  
November 14-16, Fayetteville, AR

### [Sprout Safety](#)

March 21-22, Dallas, TX

### [Internal Auditing](#)

April 6, Columbus, OH

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## FSIS Spreadsheet on Validated Pathogen Test Kits by Independent Organizations

FSIS has made available an [updated list](#) of test kits that have been validated for detection of relevant foodborne pathogens (i.e. *Salmonella*, *Campylobacter*, *E. coli* O157:H7, *Listeria* spp. including *L. monocytogenes*, and non-O157 STECs). These lists are intended to be informational and are not an endorsement or approval by FSIS of any particular method, regardless of its inclusion in the list. (see attached) While FSIS does not require the use of any particular test method, the method chosen by an establishment should be:

- 1) Validated for testing relevant foods by:
  - a) a recognized independent body (i.e., AOAC, AFNOR, MicroVal, NordVal), or
  - b) a U.S. regulatory body (i.e. FSIS MLG or FDA BAM), or an ISO method
- 2) The validated method should be:
  - a) Fit for the intended purpose and application, and
  - b) Performed under validated conditions by a laboratory that assures the quality of the analytical results.

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## HCG Advises French Dry Cured Ham Plants

Over the last several years, two HCG professionals have provided consultation to several pork plants in southern France who produce high quality, dry cured hams. These slaughter and processing plants were subsequently determined to be equivalent to USDA-FSIS regulatory requirements and are now importing Jambon de Bayonne (Bayonne Hams) into the United States. The HCG professionals made several consulting visits to the plants to advise them on the changes in slaughter and processing procedures necessary to meet U.S. food safety regulatory standards. French government inspection personnel assigned at the plants were also provided guidance on how to provide inspection services equivalent to the USDA. They also presented basic and advanced meat safety courses based on the requirements of FSIS sanitation and HACCP regulations to the industry and government inspection personnel at these plants, to assure a full understanding of the applicable regulations and directives.

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## FDA Control of Lm in RTE Foods – Guidance for the Industry

With the ever increasing number of product recalls due to the presence of *Listeria monocytogenes* (e.g., ice cream, cheese, humus, etc.), it is essential that any company producing ready-to-eat (RTE) products closely review the recently released FDA guidelines for *Listeria* control and controls of Lm in their facilities ([see attached](#)). Important sections of the FDA guidance document include, but are not limited to:

- Control of Personnel;
- Design, Construction and Operations of Your Facility;
- Design, Construction and Maintenance of Equipment;
- Sanitation;
- Controls on Raw Materials and Other Ingredients;
- Process Controls Based on Formulation of RTE Products;
- Listericidal Process Controls; Environmental Monitoring to Verify Control of *Listeria* spp. and *Listeria monocytogenes*;
- Sampling and Testing of RTE Foods; and
- Analysis of Data for Trends.

These sections, along with other valuable, practical information, for the control of Lm will be discussed in the **upcoming *Listeria* Seminar being held on April 21, 2017 by HCG and the Quality Support Group**. Plan to register soon.

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## Are Allergen Errors Always a Class I Recall?

In the U.S., control of the "big 8" allergens is mandatory. Labels must be accurate and products must match the label for allergen content as well as other labeling facts. In most cases, the presence of an unlabeled (undeclared) allergen for a food in commerce indicates the necessity for a Class I Recall; however, this is not always the case.

Historically, the FDA has classified recalls for undeclared wheat as a Class II recall due to a lack of history regarding extreme allergic responses to this specific allergen (other allergens are Class I). The approach is on

a case-by-case basis, considering the risk to the consumer. There have been circumstances that elevate the risk to the consumer and therefore elevated the Class of the recall. If a food is labeled "gluten free," consumers are likely to also understand this to mean the product is free of wheat. If wheat is in the product, there is now an increased risk due to the labeling statement. In this case, the recall may be a Class I Recall.

The topic of allergen control is of utmost importance to the food industry, particularly as Food Safety Plans are being drafted or updated to meet new regulations. The approach to control, the level of control required, and the regulatory or legal response to concerns is not always clear. HCG advises our clients to follow the regulations and communicate to others in your industry sector to ensure best practices are being followed. If you would like your allergen program reviewed, please [contact us](#).

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## Preventive Controls Alliance Training Grant Program Apply Now!

The FDA and AFDO are now accepting applications for the 2017 Preventive Controls (PC) Alliance Training Grant Program. This grant program provides funds so that food safety officials may attend the PC Human Food and PC Animal Food Alliance training courses. The grant portal is open now and will remain open until March 31, 2017 at 7:59pm EST. More information and the link to the grant portal can be found [here](#). See our list of FSPCA Preventive Controls course offerings and registration link in the "Training Opportunities" section above. If you don't see a course that is convenient to you, please [contact us](#) to discuss how we can meet your needs.

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