



July Newsletter



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Training Opportunities

[Advanced HACCP](#)

October 3-4, Fayetteville, AR

**[FSPCA Foreign Supplier Verification Programs \(FSVP\)](#)

September 12-13, Oakland, CA

September 19-20, Long Beach, CA

****New Offering!**

[FSPCA Preventive Controls – PCQI](#)

August 8-10, Peabody, MA

August 23-25, Washington, DC

September 13-15, Atlanta, GA

November 14-16, Fayetteville, AR

[FSPCA Preventive Controls & HACCP](#)

October 18-20, Peabody, MA

Register Now!

FSIS Guidance for Importing Meat, Poultry, and Egg Products into the United States



FSIS is providing guidance to interested parties on steps they can take to ensure meat, poultry, and egg products are imported in compliance with the applicable statutes and regulations of the United States. ([See attached.](#))

This guidance is intended to help U.S. importers, customs brokers, official import inspection establishments, and egg products plants understand the import requirements found in 9 CFR 327 (meat), 9 CFR 381, Subpart T (poultry), 9 CFR 590.900-970 (egg products) and 9 CFR 530.557 (*Siluriformes* fish (Docket No. FSIS-2008-0031)).

Although FSIS is requesting comments on this document, this document reflects FSIS' current position. FSIS recommends importers begin using it now.

Please [contact HCG](#) if you have any questions or need assistance.

Contributed by [Bob Savage](#), HCG Senior Vice President

FSIS Directive 8140.1 - Notice of Receipt of Adulterated or Misbranded Product

This directive instructs inspection program personnel (IPP) when to complete and submit FSIS Form 8140-1, Notice of Receipt of Adulterated or Misbranded Product. FSIS is reissuing this directive to update IPP instructions consistent with the requirements of 9 CFR 418.2; replace obsolete inspection system references; and update the distribution instructions to align with current FSIS organizational structure. ([See Attached.](#))

FSIS is also revising the form to allow electronic completion and distribution to the District Office (DO).

Contributed by [Bob Savage](#), HCG Senior Vice President

X = 6 is Only Partial Credit

HCG attended the Food Safety Preventive Controls Alliance (FSPCA) Conference in Tampa this month. There were many helpful presentations provided by individuals from industry, the FSPCA, and the FDA. Topics included several details of the Preventive Controls Rules and the Foreign Supplier Verification Rule. One of the many interesting comments came from Maile Hermida of Hogan Lovells Law Firm. She brought us back to memories of school days when she said, "X=6 is not the answer."

If you can remember your algebra class, you may remember that there was a lot of problem solving. To be successful, you had to tease out the unknown variable to get it alone in the mathematical 'sentence'. Only then could you determine its value. Often it took 3-5 steps to achieve the goal. Algebra tests typically required you to **get the right answer and show your work** as to how you reached your conclusion. If all you documented was the right answer (e.g. X=6), you would only get partial credit on the exam. You might be correct, but **demonstrating that you understand the process** was also very, very important. An answer like 'X=6' fails to demonstrate the logic behind the answer. This is a great comparison for Food Safety and HACCP Plans.

It is not enough to 'just' make safe food in a sanitary environment. A finished product test showing no pathogens is great validation, but the Food Safety or HACCP Plan must define how this was achieved. Maile's statement was a reminder of the importance of a thoroughly documented hazard analysis and resulting controls based on supporting material. Customers expect it and the law requires it. Food companies must achieve food safety and document how it was achieved today and how it will continue to be in place tomorrow.

If you need help with your Food Safety or HACCP Plan, [let us know](#). HCG has experience helping companies document how they "know" they are producing safe food.

Contributed by [Cathy Crawford](#), HCG President

FSIS Administrator Retires

USDA, Food Safety and Inspection Service Administrator, Al Almanza, announced his retirement at the end of July. Al was Administrator for 10 years and served as Acting Deputy Undersecretary for Food Safety from September 2014 to December 2016. Al began his career with USDA back in 1978 as a food inspector in a slaughter plant in the Dallas District. Working his way up, as Administrator, Al managed the nearly 10,000 FSIS employees and the inspection of nearly 6,000 meat, poultry and egg product establishments. During this time many challenges were faced and resolved to ensure the continued safety of our food supply.



Meat Thermometer Options and Calibration Tips

The videos below, recently released by the Meat Institute, demonstrate the importance of correctly using a meat thermometer to ensure that meat products have reached the correct internal temperature during cooking. Remember that thermometers aren't only for meat. For all foods, when in doubt, check the temperature!



Cyber Attacks and the Food Industry

In late June, a cyber attack that reportedly began in Ukraine and spread swiftly across the globe, impacted a wide variety of businesses including banks, pharmaceutical companies and yes, food companies. Cadbury of Australia and Royal Canin, a pet food company with operations in the United States, shut down production. Royal Canin reported to its customers over a week later that only limited production operations had resumed.

HCG reminds our clients of the importance of firewalls and protection from viruses. The company crisis management plan should take this type of challenge into consideration and consult with IT professionals; however, it is nearly impossible to prevent such an attack. The best stance is to become as prepared as possible by ensuring reliable back-up systems and the ability to move to a manual system where possible. Most data recording functions can be quickly converted to hard copy records. If electronic systems fail, manual checks of production attributes can fill the gap. However, production equipment run by computer systems may be at risk and should be further evaluated.

Contributed by [Cathy Crawford](#), HCG President

Best Wishes,

A handwritten signature in black ink that reads "Cathy M. Crawford".

Cathy M. Crawford, President

