HACCP Consulting Group, L.L.C®

Excellence in Food Safety Management

October Newsletter

As the leaves turn color and fall sets in, like many other companies, HCG is thinking about plans for 2018. We schedule courses based on client requests. Courses may be private or public and are held throughout the U.S. and abroad. If you would like to plan ahead, please let us know what type of class you are considering for 2018 and when/where you prefer for the location and date by taking our survey below. We work with you to find the best solution for your training needs.

Training Survey

In this edition...

Training Opportunities

FSPCA Preventive Controls – PCQI
November 14-16, Fayetteville, AR
November 15-17, Long Beach, CA
November 27-29, Akron, OH
January 8-10, 2018, Dallas, TX
February 28-March 2, 2018, Dayton, OH
March 20-22, 2018, Jonesboro, AR

Developing & Implementing SQF Systems
February 26-27, 2018, Dayton, OH

FSPCA Foreign Supplier Verification Programs (FSVP)
November 13-14, Long Beach, CA
January 11-12, 2018, Dallas, TX

FSPCA Preventive Controls & HACCP
February 6-8, 2018, Peabody, MA

April 10-11, 2018, Stillwater, OK

Registration for these courses will close at the end of the week, register now!

Register Now!

How and Why to Start Environmental Monitoring (Part 1)

HCG has worked with a wide variety of food and food contact material manufacturers. We've consulted and provided training in nearly every state in the United States and in over 70 countries. A common challenge HCG witnesses is that most manufacturers know how to produce an excellent product, but they have trouble proving this fact to their customers and to regulators.

A great finished product starts with high quality raw materials which are then handled in a clean environment. Developing and implementing an effective sanitation program is essential for the quality and safety of food products and is mandatory based on requirements of the USDA, FDA, and your customers. An environmental monitoring program (EMP) creates the proof needed to verify the effectiveness of the sanitation program. It provides assurance to management, regulators, customers, and auditors that the program, as designed, is functioning and the product is being produced in a sanitary environment. It can provide confidence based on data when facing outside regulatory or other inspections where sampling may be involved.

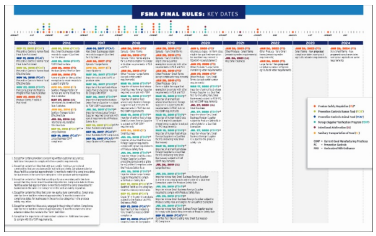
An EMP can verify control of concerns such as the inappropriate presence of pathogens or allergens, or elevated levels of bacteria indicating poor sanitation and a potential shortened shelf-life of finished products. Companies should select the elements of the EMP based on risk. Read more...

The Dangers of Raw Juice

While many believe fresh juices sold at produce stands or health food stores are good for you, that's not always the reality. The FDA has created *Talking About Juice Safety: What You Need to Know* to keep consumers up to date on food safety issues when buying and consuming juices. When some juices are not pasteurized or treated to kill harmful bacteria, consumption of them can result in life-threatening illnesses, particularly for children, the elderly, or those with serious health conditions. Consumers need to be especially careful when buying juices, such as cider, that are sold by the glass at apple orchards, farmers' markets, roadside stands, juice bars, and some restaurants because these products do not require warning labels. Be sure to ask employees if the juice has been treated when there is no label. Review this printable and shareable resource to learn more about juice warning labels.

Contributed by Bob Savage, HCG Senior Vice President

Confused about FDA Compliance Dates?



As we head into fall, it won't be long before the end of the year arrives. This is a good time to think about due dates including ones fast approaching in 2018.

HCG wishes to share with our readers this chart which provides compliance date details for the Food Safety Modernization Act:
https://www.fda.gov/downloads/Food/GuidanceRegulation/FSMA/UCM568798.pdf

If you need assistance in these matters, please contact us.

Contributed by Cathy M. Crawford, HCG President

New Guidances on Animal Food CGMPs and the FSMA 'Solely Engaged' Exemptions

Last week, two guidance documents were released by the FDA which could be helpful to those facilities that may be required to follow the guidelines of the Preventive Controls for Animal Food rule or the Preventive Controls for Human Food rule. The animal food document will help establishments determine if they are required to follow the Current Good Manufacturing Practice (CGMP) guidelines in the Preventive Controls for Animal Food rule and also explains and provides recommendations for meeting the CGMP requirements.

The human food guidance document is a draft that includes the applicability of the "solely engaged" exemptions for

the Preventive Controls for Human Food and Animal Food rules. This explains when being "solely engaged" in certain activities results in facilities possibly being exempt from CGMP or preventive controls requirements. On the other hand, the guidance includes information regarding when the "solely engaged" exemptions do not apply.

These guidance documents can be found here:
Guidance for Industry #235: Current Good Manufacturing Practice Requirements for Food for Animals

Application of the 'Solely Engaged' Exemptions in Parts 117 and 507

Do You Export to Canada?

The Food Safety Modernization Act, signed in 2011, has brought many changes to food safety systems and their requirements in the United States. In a similar manner, the Safe Food for Canadians Act, signed in 2012, is also transforming the food safety environment in Canada. Both countries are seeking to improve and align with scientific food safety concerns and global expectations. Still, there are significant differences in requirements. Companies who export should be aware of this.
For example:

- The U.S. mandates accurate labeling of eight categories of allergens while Canada adds the following additions to that list: gluten, mustard, sesame and sulfites when added or when >10 mg/kg

- Canada has adjusted its previous requirements for monitoring and control of *Listeria monocytogenese* in Ready-to-Eat foods to be closer to the U.S. requirements, but definitions of contact and non-food contact surfaces are not the same.

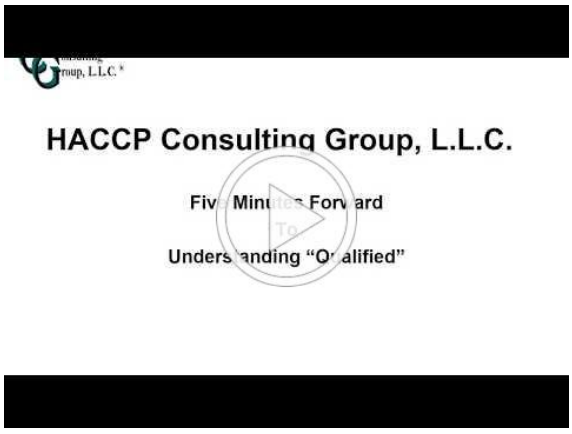
- In the U.S., manufacturers can use analytical test methods as long as they are appropriately validated, but in Canada such methods must be from a specific collection of approved methods.

Manufacturers must be responsible to understand food safety requirements in both the country of origin and country of destination. For more information about Canadian Food Safety, refer here:
http://www.inspection.gc.ca/eng/1297964599443/1297965645317

Contributed by Cathy M. Crawford, HCG President

It Only Takes 5 Minutes to Move Forward - Free Video

We hope you will take a bit of time to check out our free 5 Minutes Forward videos. The latest video is available below. It is entitled Understanding "Qualified" and includes information on how this term is used in the Preventive Controls for Human Food rule and the Sanitary Transportation rule.



Best Wishes,

Cathy M. Crawford

Cathy M. Crawford, President

HACCP Consulting Group, L.L.C.| 757-371-5832 | info@haccpcg.com | www.haccpcg.com

STAY CONNECTED