HACCP Consulting Group, L.L.C®

Excellence in Food Safety Management

November Newsletter

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Training Opportunities

Developing & Implementing SQF Systems
February 26-27, 2018, Dayton, OH
April 10-11, 2018, Stillwater, OK

FSPCA Foreign Supplier Verification Programs (FSVP)
December 13-14, Atlanta, GA
January 11-12, 2018, Dallas, TX
February 1-2, 2018, Long Beach, CA

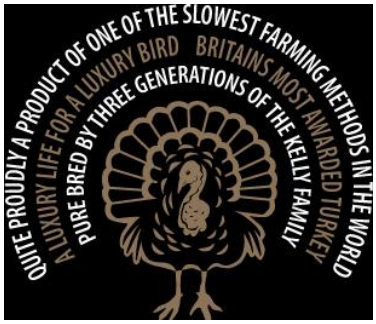
FSPCA Preventive Controls & HACCP
February 6-8, 2018, Peabody, MA

FSPCA Preventive Controls Human Food – PCQI
December 11-13, Atlanta, GA
January 8-10, 2018, Dallas, TX
January 29-31, 2018, Long Beach, CA
February 28-March 2, 2018, Dayton, OH
March 20-22, 2018, Jonesboro, AR

FSPCA Preventive Controls Animal Food – PCQI
January 23-25, Cincinnati, OH
February 13-15, Atlanta, GA

Register Now!

Client Spotlight: KellyBronze Free Range Turkeys



Just in time for Thanksgiving, the USDA has granted KellyBronze processing plant in Crozet, Virginia a full license to sell their turkeys throughout the United States. KellyBronze had previously been restricted to selling only in the state of Virginia. HCG worked with the company to ensure the facility and its food safety programs would meet USDA requirements. We are proud of their hard work and pleased to have guided them along the way. Congratulations to KellyBronze on reaching this goal !

More information about applying for and achieving a Grant of Inspection as well as the KellyBronze history can be found here.

How to Start Environmental Monitoring (Part 2)

Listeria monocytogenes (Lm) continues to be a significant public health hazard and has resulted in numerous deaths and product recalls. Product recalls have included Ready-to-Eat (RTE) meat and poultry products, ice cream, produce and many other commodities.

The first line of defense against Lm is to design an "aggressive" *Listeria* Environmental Monitoring Program (EMP). The EMP would included in your HACCP plan or identified as a Sanitation Preventive Controls Program associated with your Food Safety Plan. An EMP must be designed and implemented to demonstrate either the absence of Lm or adequate corrective actions when Lm is found.

Typically, an EMP is designed using the Zone concept. Zone 1 includes food contact surfaces (e.g., conveyor belts, slicers, baggers. Etc.) that come in contact with exposed RTE product prior to packaging. Zone 2 includes areas immediately adjacent to food contact surfaces (e.g., conveyor legs, non-contact surfaces of packaging equipment, exterior surfaces of equipment, control panels, etc.) that might contaminate Zone 1 sites. Zone 3 includes areas further removed from Zones 1 and 2 but still in the RTE area. Areas to consider as Zone 3 include drains, floors, compressed air lines, door handles, etc. Zone 4 includes areas leading into the RTE area such as maintenance rooms, adjoining offices, sanitation rooms, restrooms lunchrooms, etc. For each Zone a list of sampling sites should be compiled and a schedule developed to sample all areas over time.

Initially, companies should test surfaces for the presence of *Listeria* species; treating any positive as if it were Lm and taking the necessary corrective and preventive documented measures. This approach is commonly accepted by regulatory agencies.

If corrective and preventive measures are not sufficient, and there are repetitive findings, the EMP should specify when testing will be increased or will include testing for Lm and when RTE finished product would be held. For guidance in making these decisions, there are two excellent references with great deal of additional information for the design and implementation of your EMP. These are the FSIS's Listeria Compliance Guidelines and the FDA's Listeria Guidance Document.

HCG also has over 20 years of knowledge and experience in working with the RTE industry to assess RTE facilities, review companies' EMP and conduct in-house *Listeria* seminars to educate and training plant employees. For more information please contact HCG at info@haccpcg.com.

Contributed by Bob Savage, HCG Senior Vice President

FDA Guidance for Industry: Supply-Chain Program Requirements and Co-Manufacturer Supplier Approval

FDA has released guidance intended for persons who participate in certain "co-manufacturing" agreements in the production of human or animal food. Co-manufacturing, means a contractual arrangement whereby one party (the brand owner) arranges for a second party (the co-manufacturer) to manufacture/process human or animal food on behalf of the first party. The guidance document can be found here.

Contributed by Bob Savage, HCG Senior Vice President

FDA Report Shows Strong Compliance to Pesticide Limits

In a report issued November 6th, the U.S. Food and Drug Administration found that 98% of domestic and 90% of imported foods tested in FY 2015 were compliant with federal pesticide residue limits. The report is available online,

here. Information such as this should be used to support a hazard analysis in determining the likelihood of the potential chemical hazard of pesticides in food.

HCG wishes you a Happy Thanksgiving !
Thank you for your continued partnership.
We hope you will take some time to enjoy family friends, and wonderful (safe) food !

Best Wishes,

Cathy M. Crawford, President

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

STAY CONNECTED