



## January Newsletter



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## Training Opportunities

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

February 6-7, Chinese Camp, CA  
February 26-27, Dayton, OH  
April 10-11, Stillwater, OK  
May 21-22, Philadelphia, PA

### [Food Safety Systems Internal Auditing](#)

February 15, Fayetteville, AR

### [FSPCA Preventive Controls & HACCP](#)

February 6-8, Peabody, MA

### [Basic HACCP](#)

February 13-14, Fayetteville, AR

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

February 28-March 2, Dayton, OH  
March 20-22, Jonesboro, AR  
May 23-25, Philadelphia, PA

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

February 6-8, Cincinnati, OH  
February 13-15, Atlanta, GA

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## Safe Quality Food Institute Technical Advisory Committee Update

HCG President, [Cathy Crawford](#) and Christina Kelly-Astorga of Food Safety and Quality Systems, LLC have been elected as members of the Safe Quality Food Institute (SQFI) Technical Advisory Committee. They will represent SQF Training Centers and provide technical expertise to the SQFI on issues such as review of technical documents, compliance issues and measures to fulfill the vision and mission of the SQFI. If you have comments you would like shared with SQFI, please [contact HCG](#) to share your views on that committee.

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## New Food Fraud Tools

The Preventive Controls for foods rule requires a consideration of the potential hazards associated with economic fraud. To aid in this hazard analysis process, a classification scheme has been developed.

The scheme was developed based on 2,970 food fraud records. It breaks incidents down into three broad categories: 1) potentially hazardous adulterants, 2) adulterants that are unlikely to be hazardous, and 3) unclassifiable adulterants. Categories 1) and 2) are further broken down into seven subcategories. Using this system it was determined that only 45% of the records reviewed were potentially hazardous and the rest were not likely hazardous or not able to be classified (9%). The full abstract can be found [here](#).

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## FDA Proposed Guidance Addresses an "Abundance of Caution"

The FDA is seeking public comments on draft guidance for Public Warning and Notification of Recalls. The document, when finalized, will establish official guidance for industry and FDA staff on the use, content, and circumstances for issuance of public warnings and public notification of voluntary recalls. The goal is to increase and expedite appropriate, accurate use of public announcements and better inform the public about violative products. The draft guidance adds to existing policy for industry and FDA staff. HCG encourages review of this document and a review of internal product recall/withdrawal programs to ensure best practices to protect the public and your company. For example, companies may reconsider use of the phrase, "out of an abundance of caution." The FDA indicates public warnings should not include that phrase if a warning or recall is associated with a positive pathogen result.

With recalls occurring for products that are not technically adulterated (read more [here](#)), it is becoming increasingly important to understand the FDA stance on this topic. The full text of the guidance can be found [here](#).

The FDA template for a recall plan, shared with participants of HCG [Preventive Controls training](#), is a good start for a recall plan. That plan could be improved with more detail to ensure consumer safety and better protective measures for your business. For assistance in recall plan development., please [contact us](#).

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## Food safety Rules for Most Truck Fleets

The links between segments of the food chain will grow stronger this year as the Food Safety Modernization Act Sanitary Transportation Rules are implemented. The requirements are already in effect for large carriers and fleet agencies. The regulations are being implemented more fully this year with smaller companies needing to achieve and maintain compliance as of September 17th.

Vehicles transporting food must be clean and not present risks of contamination. Certain records, such as those that demonstrate temperature controls, must be maintained and made available for regulatory review. There must also be records of carrier training so they recognize food safety risks and understand their responsibilities.

The FDA offers a brief training segment [here](#), but indicates this training should supplement a more comprehensive training program. HCG has developed a training program designed for carriers, shippers, loaders and receivers. This program includes a 4-hour training session accompanied by a manual and ending in an examination. Successful completion of the exam (75% or better) awards the participant with a certificate in sanitary transportation, valid for three years. Interested? Please [let us know](#) !

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## FDA Releases Guidance Documents to Help Importers and Food Producers

The U.S. Food and Drug Administration issued five guidance documents to help importers and food producers meet key food safety provisions mandated by the FDA Food Safety Modernization Act (FSMA).

- The guidance documents include: [A draft guidance on Foreign Supplier Verification Program \(FSVP\) rule](#)
- [A Small Entity Compliance Guide on the FSVP rule](#)
- [A draft guidance on the term “Same Level of Public Health Protection” used in both the FSVP and Produce Safety regulations](#)
- [Chapter 15 of the draft Preventive Controls for Human Food guidance regarding Supply-Chain requirements](#)
- [Enforcement Discretion guidance regarding the application of FSVP to certain importers of grain raw agricultural commodities \(RACs\)](#)

These guidance documents represent the latest steps FDA is taking to help food importers and producers understand and effectively implement the FSMA regulations.

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## FDA Posts Guidance for Supply-Chain Controls

The FDA has issued another chapter of draft guidance material to help food processors and manufacturers comply with implementing the Food Safety Modernization Act's (FSMA's) requirements for supply chain controls for human food. The guidance can be found [here](#).

HCG highly recommends a thorough understanding of each supplier of items with potential food safety hazards. Beginning the process with a detailed hazard analysis is the first step. If you are not sure how this is done, please [contact us](#) for assistance.

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Best Wishes,



Cathy M. Crawford, President

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