



June Newsletter

Training / Consulting Assistance

Available Training

Below are the training offerings now and into the fall. While we continue to prefer live in-person classes for the most benefit, we also are offering live -virtual training.

We hope you can plan ahead and sign up for classes or consulting visits. If you are concerned about unknowns, talk to us about a flexible cancellation or date-change policy. Email info@haccpcg.com for more information.

Advanced HACCP

June 24-25, Ontario, CA

Basic HACCP

July 20-21, Philadelphia, PA

July 22-23, North Manchester, IN – Bilingual Course

July 29-30, Ontario, CA

August 26-27, Los Angeles, CA

September 23-24, Orange County, CA

October, Pleastanton, CA

October 20-21, Cleveland, OH

October 28-29, San Diego, CA

FSPCA Preventive Controls for Human Food

August 3-7, 8 am- noon EST, virtual-live

FSPCA Preventive Controls Plus HACCP

July 29-31, Dayton, OH

Implementing SQF Systems

July 20-23, 8 am- noon EST, virtual-live

October 22-23, Cleveland, OH

December 8-9, Dayton, OH

Register
Now!

Food Systems Dashboard

A Food Systems Dashboard has been developed by Johns Hopkins University and The Global Alliance for Improved Nutrition, with collaborators at Harvard University, University of Michigan, Michigan State University, The Food and Agriculture Organization of the United Nations, and The Agriculture-Nutrition Community of Practice. To our knowledge, this is **the first dashboard that collects country-level data across all components of the food system.**

This Dashboard combines data from multiple sources to give users a complete view of food systems. Users can compare components of food systems across countries and regions. They can also identify and prioritize ways to sustainably improve diets and nutrition in their food systems.

Dashboards are useful tools that help users visualize and understand key information for complex systems. Users can track progress to see if policies or other interventions are working at a country or regional level

In recent years, the public health and nutrition communities have used dashboards to track the progress of health goals and interventions, including the Sustainable Development Goals.

The dashboard can be used by anyone interested or involved in the food system:

- **Policymakers at the country, regional, and global levels**
- **National statistical agency workers**
- **Policy analysts in government ministries**
- **United Nations and non-governmental organization development practitioners**
- **Civil society workers**
- **Business leaders and entrepreneurs**
- **Researchers, academics, and students**

The website can be found at www.foodsystemsdashboard.org

Do not hesitate to contact [HCG](#) for more information.



Intentional Adulteration Rule Due Date Approaching.

The Rule for Mitigation Strategies to Protect Food Against Intentional Adulteration was issued in May 2016. The first compliance was July 26, 2019 for businesses with sales of \$10 million or more per year and with more than 500 full-time equivalent employees. **The compliance date for small businesses, with fewer than 500 full-time equivalent employees, is July 27, 2020.** T

The compliance date for very small businesses is July 26, 2021. These very small businesses are exempt from the requirements of the rule but they must document that they meet the requirement to be exempt. While the FDA has delayed significant enforcement of the requirements under this portion of the Food Safety Modernization Act,

HCG reminds our readers achieving compliance takes time and effort and this should not be delayed. For a copy of a Word Document that can be used to conduct a Key Activity Type Vulnerability Assessment, please contact us at info@haccpcg.com.

FSIS Expands Shiga Toxin-Producing E. Coli (STEC) Testing to Additional Raw Beef Products

The Food Safety and Inspection Service (FSIS) announced plans to expand its routine verification testing for six Shiga toxin-producing Escherichia coli (non-O157 STEC; O26, O45, O103, O111, O121, or O145) that are adulterants, in addition to the adulterant Escherichia coli (E. coli) O157:H7, to ground beef, bench

trim, and raw ground beef components other than raw beef manufacturing trimmings (i.e., head meat, cheek meat, weasand (esophagus) meat, product from advanced meat recovery (AMR) systems, partially defatted chopped beef and partially defatted beef fatty tissue, low temperature rendered lean finely textured beef, and heart meat)(hereafter "other raw ground beef components") for samples collected at official establishments.

STEC includes non-O157 STEC; O26, O45, O103, O111, O121, or O145, that are adulterants, and E. coli O157:H7. Currently, FSIS tests only its beef manufacturing trimmings samples for these six non-O157 STEC and E. coli O157:H7; all other aforementioned raw beef products are presently tested for E. coli O157:H7 only. FSIS also intends to test for these non-O157 STEC in ground beef samples that it collects at retail stores and in applicable samples it collects of imported raw beef products. FSIS is requesting comments on the proposed sampling and testing of ground beef, bench trim, and other raw ground beef components. FSIS will announce the date it will implement the new testing in a subsequent Federal Register notice.

FDA's Requirement for Supply-Chain Preventive Controls for Human Foods



safe • food

M A T T E R S

HCG believes what sets traditional HACCP apart from FDA's Hazard Analysis and Risk-Based Preventive Controls for Human Foods regulation (21CFR117) is the requirement that, where applicable, facilities develop and implement written procedures for supply-chain preventive controls (SCPC). This program is linked to the facilities' hazard analysis where a potential hazard is identified either in an ingredient or raw material. While the supply-chain preventive controls program is only applicable to FDA regulated facilities, establishments under the jurisdiction of the USDA, Food Safety and Inspection Service (FSIS) may also want to review this approach to possibly strengthening their ingredient and raw material hazard analysis in compliance with the FSIS HACCP regulations. This could be developed as a prerequisite program and referenced in the hazard analysis.

The Supply-Chain Program general requirements include:

1) using approved suppliers, 2) determining supplier verification activities, 3) conducting supplier verification activities, 4) documenting supplier verification activities, and 5) when applicable, verifying a supply-chain control is applied by an entity other than your supplier.

Using approved suppliers apply when a reasonably likely to occur hazard (i.e., biological, chemical or physical) is identified in the hazard analysis for an ingredient or raw material where you, as the receiving facility, does not control the hazard. A SCPC program is not required for an ingredient or raw material where no hazard is identified in the hazard analysis. Where an approved supplier is determined, approval is required before receiving the ingredient. In such cases written procedures for receiving the ingredient are required along with receiving records. Appropriate supplier verification activities can include, but are not limited to, onsite audits, sampling and testing of the ingredient, or review of the supplier's food safety records. Other verification activities can include requesting certificates of conformance, certificates of analysis and letters of continuing guarantee.

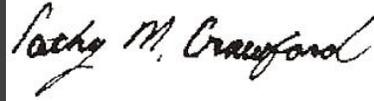
Conducting supplier verification activities depends on many considerations including: what does the hazard analysis suggest about the nature of the hazard, are preventive controls applied by the supplier, what are the supplier's procedures, processes and practices, what are your historical test or audit results, has FDA issued any warning letters to your supplier and are the supplier's storage and transportation practices appropriate.

Supply-chain program documentation include the written program, documentation of supplier approvals, receiving procedures, receiving records and results of appropriate supplier verification activities. Also, where applicable, if the receiving facility relies on a facility downstream to control the hazard (i.e., thermally processes the ingredient) the receiving facility would also document this in its program as well.

While the Supply-chain Preventive Controls program is only applicable to FDA regulated facilities, establishments under the jurisdiction of the USDA, Food Safety and Inspection Service (FSIS) may also want to review this approach to possible strengthening their ingredient and raw material hazard analysis in compliance with the FSIS HACCP regulations. This could be developed as a prerequisite program and referenced in the hazard analysis.

Details for the development of the SCPC program (and exemptions) are contained in Chapter 15 of the FDA's Preventive Controls for Human Foods: Draft Guidance for the Industry [\(attached\)](#).

Best Wishes - Stay Healthy and Helpful -



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STAY CONNECTED

