



April Newsletter



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Training Opportunities

Developing & Implementing SQF Systems (Edition 8 of SQF Code)

- May 21-22, Philadelphia, PA

Basic HACCP

FSPCA Preventive Controls for Human Food (PCQI)

- April 20-21, Warren, RI
- July 25-27, Dayton, OH

- July 12-13, Akron, OH

Internal Auditing

- July 17-18, Cuyahoga Falls, OH

FSPCA Preventive Controls for Animal Food (PCQI)

- May 15-17, Alameda, CA

Register Now!

Still Talking About HARP-C?

There are still occasional postings regarding HARP-C Plans and HARP-C Training events. The acronym, HARP-C stands for Hazard Analysis and Risk-based Preventive Controls. It was used frequently in the food industry prior to the publication of the Food Safety Modernization Act (FSMA) and prior to the training developed to communicate the components of that Rule. Since FSMA has become final, it has been made clear the FDA does not use this term. FDA addresses the Rule by its name: FSMA, or the proper name for components of FSMA such as the Preventive Controls Rule for Human Food. The resulting plans are called Food Safety Plans, not HARP-C Plans. The FDA continues to recognize the value of Hazard Analysis and Critical Control Point (HACCP) Plans as a component of Food Safety Plans. HCG provides our clients with training and guidance on the development of those plans. We also encourage our clients to avoid the term HARP-C in order to communicate more easily with the FDA and others.

FSIS Relationships

This article is contributed by HCG Consultant, [Eric Thompson](#). Eric's prior experience as an FSIS Enforcement Investigation Analysis Officer gives him unique insight toward helping industry and regulators better communicate.

I have been thinking about all the times I have heard negative comments about professional relationships from both Establishment and USDA Food Safety and Inspection Service (FSIS) personnel. The main complaints are that the plants do not respect FSIS and its authority, and that FSIS does not listen when establishment personnel ask questions or simply want FSIS to clarify the regulatory requirements. This generally boils down to an argument between FSIS and Establishment personnel that is counterproductive to everyone.

FSIS has 10 District Offices overseeing approximately 7,700 inspection program personnel (IPP) dispersed geographically across the 50 United States and U.S. territories. Approximately 90% of the regulated industry are HACCP size small or very small establishments.

[Read more...](#)



The SQF International Conference will be held in Atlanta on October 23-25 this year and registration to attend is now open. HCG will be there and we hope to see you there! Visit the SQFI Conference site for more information [here](#).

Young Poultry Line Speed Waivers

USDA Food Safety and Inspection Service (FSIS) intends to begin evaluating applications for line speed waivers, and to use the data collected from young chicken establishments that are granted waivers to evaluate their ability to maintain process control when operating at line speeds up to 175 birds per minute (bpm). FSIS intends to limit the additional line speed waivers to establishments that have the ability and intent to operate at line speeds faster than 140 bpm.

To be eligible for a line speed waiver, a young chicken slaughter establishment:

- Must have been operating under the New Poultry Inspection System (NPIS) for at least one year, during which time it has been in compliance with all NPIS requirements;
- Must be in *Salmonella* performance standard category 1 or 2 for young chicken carcasses;
- Must have a demonstrated history of regulatory compliance. More specifically, the establishment has not received a public health alert for the last 120 days; has not had an enforcement action as a result of a Food Safety Assessment conducted in the last 120 days; and has not been the subject of a public health related

enforcement action in the last 120 days; and

- Must be able to demonstrate that the new equipment, technologies, or procedures that allow the establishment to operate at faster line speeds will maintain or improve food safety.

[Read more...](#)



HCG to Present at Food Safety Supply Chain Conference

HCG will be presenting, "Sanitary Transportation: What is Required and What is Preferred" at the June 12-13 Conference in Rockville, MD. For more information on this conference, please go [here](#).

Are You Using Appendix A or B for HACCP Plan Support?

If you have been using Appendix A and B to support HACCP Plan decisions regarding cooking and cooling, you should be aware that these have been revised. The Food Safety and Inspection Service (FSIS) has indicated it will begin verification activities to ensure the new revisions are appropriately used as of March 22, 2019. One change is that FSIS emphasizes in Appendix A, the need to address humidity on all cooked products and its impact on lethality. The revised documents are available here: [Appendix A](#) and [Appendix B](#).

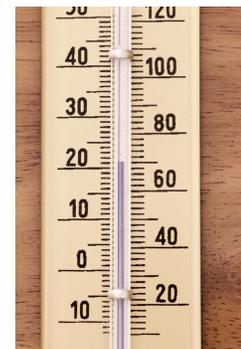
HCG Presents to TRSA

On March 14, 2018, HCG Associate Eric Thompson gave a HACCP presentation to TRSA members. TRSA is a trade association strengthening and promoting the linen, uniform, and facility services industry. The commercial laundry industry is beginning to look at HACCP as a viable option for managing risk in today's business climate. The presentation introduced HACCP definitions and terminology, identified the seven principles of HACCP, explained the logical steps in applying HACCP, and outlined the tasks required to apply HACCP. The webinar was well attended and feedback was positive. HCG expects interest in HACCP to grow as all industries look for ways to help manage risk. If you would like to explore HACCP for your industry, please [contact HCG](#).

Transportation Temperature Troubles

On March 29, Target Corporation, announced a recall of an undetermined amount of meat and poultry products due to temperature abuse during transport. This is the first recall of this type and may be related to the increased emphasis placed on transportation due to the Sanitary Transportation Rule. In this case, temperature abuse was quite evident. The product was at temperatures greater than 60°F for over five hours. This could result in the growth or proliferation of *Bacillus cereus*, *Staphylococcus aureus*, Shiga-toxin producing *E. coli*, *Listeria monocytogenes*, and *Salmonella*.

HCG reminds our clients of the importance of collecting temperature control data for shipments by rail or road when those shipments require temperature controls for safety. In addition, training of transportation personnel will help ensure appropriate controls and swift responses to potential incidents of temperature changes while food is in transit.



Best Wishes,

Cathy M. Crawford, President

STAY CONNECTED

