



## September Newsletter



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## Training Opportunities

### **Basic HACCP**

- October 3-4, Fayetteville, AR (for FSIS regulated companies)
- October 22-23, Westminster, MD
- March 7-8, 2019, Peabody, MA

### **Advanced HACCP**

- October 31-November 1, Fayetteville, AR

### **FSPCA Preventive Controls for Animal Food (PCQI)**

- November 27-29, Dallas, TX

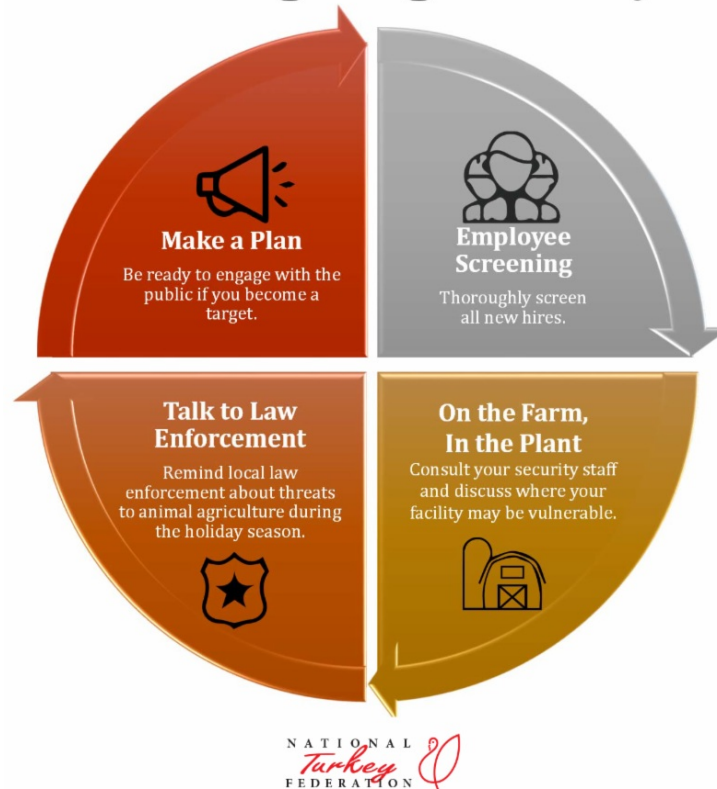
### **FSPCA Foreign Supplier Verification Programs (FSVP)**

- November 13-14, Cincinnati, OH
- December 11-12, Long Beach, CA

## Fall is Coming and That Means Thanksgiving Turkey!

As the weather begins to change, many start to look forward to Thanksgiving. The National Turkey Federation (NTF) has shared an important reminder for turkey processors to help ensure food safety at this time of year. Sadly, there are those who may seek harm to the industry due to different perspectives regarding animal care. If your company might be a target of such an attack please review this information from the NTF:

### Thanksgiving Security



### SQF Edition 8: How is it Going?

At HCG, we frequently assist companies with achieving or maintaining certification to third-party audit requirements such as those in the SQF Audit. Since January of this year, a new version of the SQF Code has been in place. The transition has gone well and has been enhanced by paying close attention to details. We wanted to take a moment to share some of the details often missed.

- The SQF Quality Certification requirements contain a stipulation for approved suppliers that is not present in the Food Safety Code for Manufacturers. Under the Quality Code, the approved supplier program shall require suppliers to be "certified to a second or third party quality management system." Note the reference to quality as a key detail.
- The Food Fraud vulnerability assessment and mitigation plan has two components. Both the assessment on raw materials and the written mitigation plan are important. Some have overlooked one or the other leading to a non-conformance. Others only conduct an assessment on their raw materials but do not address the facility or process.
- The Annual SQF Management Review is often missed. It is easy to focus on completing the newly required monthly update meetings with management, but do not overlook the continued annual requirement for the SQF system review.

We hope these tips were helpful!

## FDA Registration Due This Year

2018 is an even-numbered year; therefore, food facilities that have registered with the FDA need to update or renew that registration between October 1 and the end of the year. To assist with questions, the FDA released [updated guidance](#) for the registration of food facilities.

A supplement to the guidance provides new topics containing keys to understanding who must register. An essential factor is knowing who has physical control over the food. For example, if food is stored in a leased or rented self-storage unit, the owner of that unit likely has no control of its contents. The person who leased the space would need to register that unit. Shared commercial kitchens are similar. Each business unit leasing or renting space in a shared kitchen may need to register. The building owner may or may not need to register depending on whether or not that entity has physical control over the food (e.g. they manage receiving or storing operations on behalf of the resident companies of the space.)

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## Best Practices for Handling Foreign Object Complaints

Foreign object control can be challenging and related recalls have become prevalent. In response, a collaboration of trade associations have assembled a new document summarizing best practices for handling complaints due to the presence of foreign objects. Although written for establishments under FSIS Jurisdiction, all food companies should consider these best practices.

Recommendations include:

- Ensure a mechanism for receiving and communicating complaints including those that may arise from co-manufactured foods and foods with common brand names.
- Ensure documentation of complaint details from the source of the complaint and the investigation.
- Conduct a risk assessment for verified complaints.
- Ensure a system of segregation and isolation for products or ingredients associated with a significant complaint.
- Ensure notification and recall procedures are in place.
- Ensure a root cause analysis and preventive measures are deployed to reduce the likelihood of recurrence.

Official Establishments should be aware that under certain circumstances, FSIS must be notified within 24 hours of becoming aware of the receipt of adulterated or misbranded materials. The best practices document can be found [here](#).

Please [contact HCG](#) if you would like a review of your foreign object control or complaint management program.

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## FSIS Utilizing Whole Genome Sequencing (WGS) Results

Whole genome sequencing (WGS) reveals the complete DNA make-up of an organism, enabling FSIS to better understand variations both within and between species. This in turn allows FSIS to differentiate between organisms with a precision that other technologies do not allow. FSIS is using this technology to perform basic foodborne pathogen identification during foodborne illness outbreaks and applying it in novel ways that have the potential to help reduce foodborne illnesses and deaths over the long term both in the U.S and abroad.

The most basic application of this technology to food safety is using it to identify pathogens isolated from food or environmental samples. These can then be compared to clinical isolates from patients. If the pathogens found in the food or food production environment match the pathogens from the sick patients, a reliable link between the two can be made, which helps define the scope of a foodborne illness outbreak. This type of testing has traditionally been done using methods such as pulsed-field gel electrophoresis (PFGE), but there are some strains of Salmonella spp. that PFGE is unable to differentiate. WGS performs the same function as PFGE but has the power to differentiate virtually all strains of foodborne pathogens, no matter what the species. Its ability to differentiate between even closely related organisms allows outbreaks to be detected with fewer clinical cases and provides the opportunity to stop outbreaks sooner and avoid additional illnesses.

[Read more...](#)

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## HCG Returns to Poland

HCG Professionals returned to Poland in September to provide Food Safety and Regulatory



Enforcement training for some 60 General Veterinary Inspectorate (GVI) inspection personnel who have inspection responsibilities over Polish establishments exporting product to the United States. Topics discussed included enforcement verification activities associated with FSIS, Sanitation Performance Standards (SPSs), Sanitation Standard Operating Procedures (SSOPs), HACCP; process validation; control of *Listeria* when producing ready-to-eat (RTE) products; and the thermal processing of low-acid canned food products. Also discussed during the training was information regarding the new FSIS poultry inspection system and the proposed new swine slaughter inspection system.

Training for the GVI inspection personnel was conducted at Poland's National Veterinary Research Institute in Pulawy, Poland.

Following the GVI training, HCG conducted Basic HACCP training for some 45 industry personnel and the Polish Meat Association.

### General Veterinary Inspectorate



### Polish Meat Association



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## FDA Releases New Guidance for Industry

The U.S. Food and Drug Administration has released a new guidance document for the industry regarding the Determination of Status as a Qualified Facility Under Part 117: Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food and Under Part 507: Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals. See [attached](#).

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Best Wishes,

Cathy M. Crawford, President

STAY CONNECTED

