



February Newsletter



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Developing & Implementing SQF Systems

- April 10-11, Philadelphia, PA

Basic HACCP

- April 8-9, Philadelphia, PA
- May, Westford, MA

FSPCA Preventive Controls for Human Food (PCQH)

- March 27-29, Fayetteville, AR

Basic HACCP + Preventive Controls (combined)

- March 26-28, College Park, MD
- May, Dayton, OH

[Register Now!](#)

**Do you need On-Site Training?
No problem.**



HCG Welcomes Mr. Robert Lopez

We are pleased to announce Robert Lopez as the newest Member of the HACCP Consulting Group. Robert has a strong background in HACCP, and the many pre-requisite programs necessary to build and maintain a strong food safety system. His 30+ years of experience include manufacturing, distribution, retail, and food service operations. He is available to offer bilingual (English and Spanish) assistance to clients seeking reviews, updates or the development of their systems to meet customer and regulatory requirements. He also has a background in legal studies and environmental health and engineering. Robert has a black belt in Taekwondo and a brown belt in Judo.

Please fill out our "contact us" form found [here](#) to welcome him or request his aid. Also, watch our newsletters for the announcement of a HACCP Course in California soon!

In Case You Missed It

This month FDA published "Public Warning and Notification of Recalls Under 21 CFR Part 7, Subpart C – Guidance for Industry and FDA Staff" ([attached](#)).

The purpose of this guidance is to assist and provide recommendations to industry and FDA staff regarding the use, content, and circumstances for issuance of public warnings and public notifications for firm-initiated or FDA-requested recalls under 21 CFR Part 7, Subpart C–Recalls (Including Product Corrections) –Guidance on Policy, Procedures, and Industry Responsibilities. The guidance also discusses what information should be included in a public warning, as well as the parties responsible for issuing it. It represents FDA's current thinking on public warning and notification of recalls under 21 CFR Part 7.

If companies have any concerns about the adequacy of its recall program please consider having HCG conduct an assessment of the plan.

Similarities between FSIS HACCP Plans and FDA Food Safety Preventive Controls Plans

Having taught HACCP-based food safety principles for many years and now many Preventive Control for Human Foods training programs, there are several similarities between the two food safety approaches that may assist establishments producing both USDA, Food Safety and Inspection Service (FSIS) and Food and Drug Administration (FDA) regulated products. One of the keys is understanding the terminology used by the two regulatory agencies.

First, the FSIS, HACCP-based regulations are derived from the principles articulated by the National Advisory Committee for the Microbiological Criteria for Foods in 1997. FDA has incorporated these same principles in what FDA calls Process Preventive Controls as part of an establishment's Food Safety Program. FDA also identifies three other Preventive Control programs (i.e., Sanitation Preventive Controls, Food Allergen Preventive Controls, and, Supply-Chain Preventive Controls) that must also be considered in the Food Safety Plan.

[Read more...](#)

U.K. Seeks to Change Labeling Rules

Government officials in the U.K. are seeking comments on proposed changes to food allergen labeling rules for foods prepacked for direct sale. In the U.K., 14 allergens are recognized as requiring labeling: celery, crustaceans, eggs, fish, gluten, lupin, milk, mollusks, mustard, peanuts, sesame seeds, soy beans, Sulphur dioxide and sulphites, and nuts. Comments are sought on four options.

Should the government -

1. promote best practice (no change in law)

2. add "ask the staff" stickers to packaging, staff would have to provide information orally and in writing if asked
3. label food with the name of the food and list allergens, or
4. label food with name of food, full ingredients list and with allergens emphasized.

[Read more...](#)

Retail or Wholesale: Why it Matters!

Recently, the FDA issued a Warning Letter to a company due, in part, to confusion over the difference between retail sales and wholesale. Text from the letter stated that the FDA inspected the manufacturing facility and identified serious failures to meet regulatory requirements. This was partially because the company was not aware it had to comply with wholesale food regulations. Failure to meet those requirements enabled the FDA to declare the company's products adulterated. Adulterated product cannot be sold. Don't let this happen to you!

Selling directly to consumers is retail. A retail establishment is defined as an operation that provides directly to consumers and does not include selling or distributing to other business entities. If your company is selling wholesale, it does not meet the definition of a retail establishment, and you are likely not exempt from Preventive Controls or HACCP regulations. Please [contact us](#) for assistance or clarification of these important requirements.

Best Wishes,



Cathy M. Crawford, President

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STAY CONNECTED

