



January Newsletter



One month of 2019 is already nearly gone. How are those New Year's Resolutions and goals coming along? Did you plan to improve your food safety system or strengthen your team? We would be honored to be your resource toward making this a more successful year. Please review our upcoming training events and [contact us](#) for other more specific needs.

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2019 Training Opportunities

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New FSPCA Course

Developing & Implementing SQF Systems

- March 14-15, **New Location!** Denver, CO
- April 10-11, Philadelphia, PA

Basic HACCP

- March 7-8, Westford, MA
- April 8-9, Philadelphia, PA

FSPCA Preventive Controls for Human Food (PCQH)

- February 25-27, Long Beach, CA
- March 27-29, Fayetteville, AR

FSPCA Foreign Supplier Verification Programs (FSVP)

- February 28-March 1, Long Beach, CA

Register Now!

Do you need On-Site Training? No problem.

Please contact us to schedule a time that works for you...
email: info@haccpcg.com
or check out our website www.haccpcg.com



FDA Top 5 Violations

Food Safety News recently summarized data illustrating the top five violations observed in FDA regulated facilities in 2018. The top concerns are:

1. Sanitation Monitoring – not properly monitoring sanitation conditions and practices with sufficient frequency.
2. Pest Control – not correctly excluding pests from potentially contaminating food.
3. Manufacturing, Processing, Packing, and Holding Controls – not implementing proper controls to mitigate the risks of food hazards, such as growth or microorganisms, allergen cross-contact and contamination of food.
4. Sanitary Operations and Plant-Maintenance – not maintaining cleanliness of facility or not keeping them in good repair.
5. Personnel – not taking reasonable measures and precautions related to staff.

What are the top ways to avoid these issues?

1. Review the Current FDA Good Manufacturing Practice Regulations (21 CFR Part 117). Your documented and implemented GMPs should meet these standards. If your products are under FSIS regulations, the FDA GMPs still represent excellent advice. Proof of compliance means ensuring you have sound Standard Operating Procedures (SOPs) or prerequisite programs and records of monitoring activities and conditions.
2. Focus on Training. Train all staff of the importance of following Good Manufacturing Practices. GMPs are not simply a rule. These are the actions and conditions required to prevent illness or injuries to others. Training needs to involve every level of the organization and it must include the reasons behind the rules. This helps build a stronger culture. Training is also mandated under the Food Safety Modernization Act.
3. Review your food safety system. Have your programs and procedures reviewed by someone with experience outside of your own facility (i.e., another set of eyes). This can be done as a consultative visit, a second or third party audit. Because third party auditors are instructed not to give advice, HCG recommends consultative reviews. Our consultants can identify weak areas of food safety systems and recommend practical solutions.

These actions will help ensure future FDA inspections will go smoothly and GMP violations will be minimized. If HCG can be of assistance please do not hesitate to [contact us](#).

New Study on Plant Root Uptake of Salmonella from Soil

An article published in BMC Plant Biology, may help explain some of the issues confronting the produce industry in dealing with *Salmonella* and other pathogenic bacteria.

This is important because pre-harvest contamination of fruits and vegetables by *Salmonella* in the fields is a significant cause of food-borne outbreaks. Certain natural openings in the produce are known as entry points. This study investigated lateral root mediated entry of *Salmonella* and concluded that *Salmonella* cannot degrade plant cell wall material and so it relies heavily on natural openings. Its invasion is highly dependent on the number of lateral root entry points. When the number of lateral roots was enhanced by increasing soil salinity, plants became susceptible to *Salmonella* invasion in roots and its transmission. Understanding this may help reduce the risk of future *Salmonella* outbreaks from produce.

The complete article “Root Mediated Uptake of *Salmonella* Is Different from Phyto-Pathogen and Associated with the Colonization of Edible Organs” is attached for your information.

FSIS Notice 01-19 Extension of Delayed Implementation of Verification of Revised Appendix A and B

On January 23, 2019 FSIS published FSIS Notice 01-19 ([attached](#)) to replace FSIS Notice 17-18. This new notice informs inspection program personnel (IPP) that establishments that use FSIS [Appendix A](#) and [Appendix B](#) as scientific support for lethality and stabilization procedures may continue to use the 1999 or 2017 versions until further notice.


This new notice also provides instructions for Enforcement, Investigation, and Analysis Officers (EIAOs) when performing Food Safety Assessments (FSAs) in establishments using FSIS Appendix A and B as scientific support. In the next few months, FSIS will announce in the Federal Register, the availability of updated versions of the lethality (Appendix A) and stabilization (Appendix B) guidance, respond to comments on the 2017 versions of this guidance, and announce dates when FSIS will begin to verify that those establishments that choose to use the safe harbors provided in this guidance as scientific support for their validated HACCP systems are using the information in the 2019 versions of the guidance.

If establishments have any questions regarding FSIS Notice 01-19 or the 2017 Compliance Guidelines please do not hesitate to [contact us](#) at any time.

NEW FSPCA Course - FSPCA IA Identification and Explanation of Mitigation Strategies

The Food Safety Modernization Act (FSMA) Final Rule on Mitigation Strategies to Protect Food Against Intentional Adulteration requires facilities to identify and implement mitigation strategies at actionable process steps identified by a vulnerability assessment. It also requires certain individuals to successfully complete training at least equivalent to a standardized curriculum recognized as adequate by FDA. Or, those individuals can be otherwise qualified through job experience. HCG recommends obtaining the training developed by the FSPCA. Visit the FSPCA website and download the [FSPCA IA Identification and Explanation of Mitigation Strategies Information Packet](#) with complete details about the course, instructions to access to the course and how to print/save the FSPCA certificate of completion.

Best Wishes,



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STAY CONNECTED

