
June Newsletter



In this edition...

Training Opportunities
Summer Food Safety
FDA Food Code

FSMA Intentional Adulteration Rule Coming in July
USDA, FSIS FoodKeeper App

Failure to Have Foreign Supplier Verification Plan a Common Inspection Observation

Training Opportunities

Basic HACCP

- July 23-24, Los Angeles, CA
- October 21-22, Florence, KY (Cincinnati)

Advanced HACCP

- September 18-19, Columbus, OH

FSPCA Preventive Controls + HACCP

- August 27-29, Westford, MA
- September 11-13, Cinnaminson, NJ - more info coming soon

Developing & Implementing SQF Systems

- October 23-24, Florence, KY (Cincinnati)

SQFI Fundamentals

- August 21-22, Cleveland, OH

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



Summer Food Safety

Summer is here! Be sure to fill your picnic basket with safe food to avoid getting sick. You can keep your family healthy by following some easy steps. [Learn more](#). Also, with BBQ season upon us, this is a great time to educate at <http://www.fightbac.org/grill-master/>



Help spread the word on food safety by joining the Partnership for Food Safety Education [@fight Bac](#). If you do not know about the Fight BAC initiative, it is worth investigating. They have educational materials and other helpful items.

FDA Food Code

Do you follow the (right version of the) FDA Food Code? It's a great reference and tool for development of HACCP and Food Safety Plans, but not all U.S. States have adopted the same version. The FDA recently published an update on the status of adopting the Food Code. Remember to check local and state regulations before assuming something is a 'rule' vs a best practice.

Figure 2 reflects the most recent Food Code edition that was adopted in each State regulatory agency (as of 2018). Each State has at least one agency that has adopted the FDA Food Code, with California the only exception.

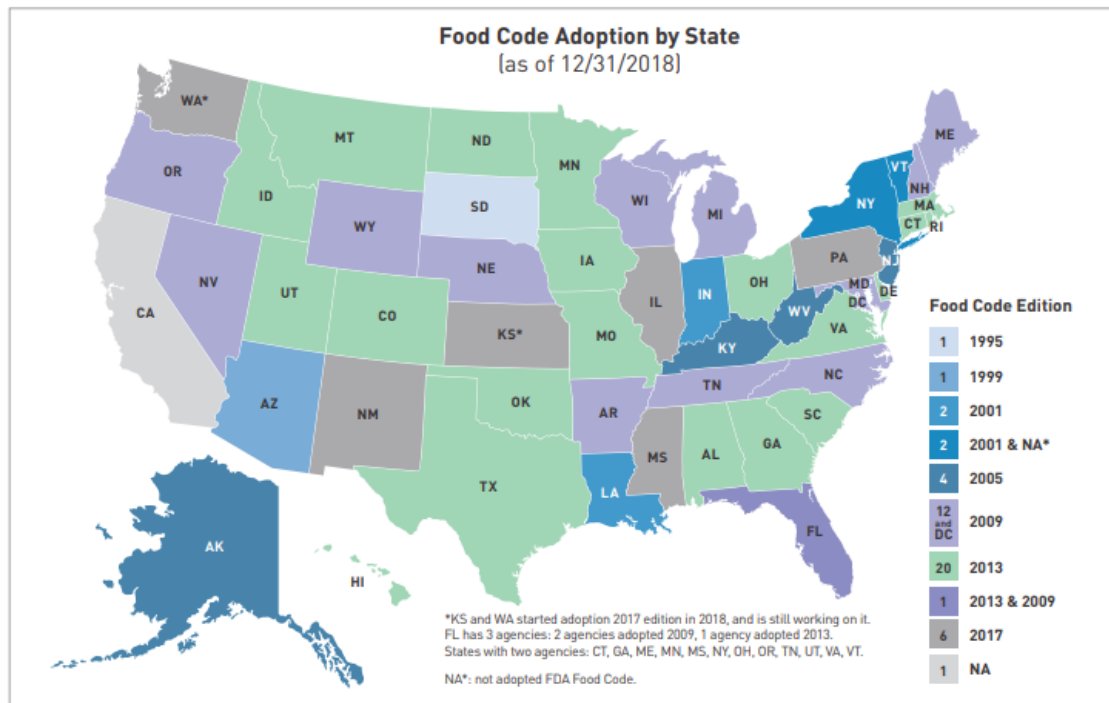


Figure 2: Food Code edition by State as of 2018.

FSMA Intentional Adulteration Rule Coming in July

The Food Safety Modernization Act (FSMA) final rule on intentional adulteration (I.A.) addresses hazards that may be intentionally introduced to foods, including by terrorism, with the intent to cause widespread harm to public health. The Food and Drug Administration announced it will soon begin routine inspections to verify compliance with the Final Rule for Mitigation Strategies to Protect Food Against Intentional Adulteration.

Food facilities covered by the rule are required to develop and implement a food defense plan. They must conduct a vulnerability assessment identifying any points in their processes that pose significant risk for intentional adulteration. Next, they must put in place mitigation strategies to address identified vulnerabilities and a system must be for monitoring, corrective action and verification of those strategies. Each of these components also requires records.

Facility personnel working at the most vulnerable points in a facility, and their supervisors, will be required to take food defense awareness training on how to implement mitigation strategies.

The first compliance date for the final rule is July 26. This date applies to businesses with sales of \$10 million or more per year with more than 500 full-time equivalent employees. The compliance date for small and very small businesses are in 2020 and 2021. About 9,800 food facilities are covered by the intentional adulteration rule. The rule also applies to some facilities outside the country if they export food to the United States.

In March, a group of food industry associations wrote the F.D.A. requesting a one-year extension to the compliance deadline due to concern that food companies do not have all the guidance and other supporting materials that may be needed. That request was denied.

The FDA stated the intent to educate while they regulate. Initial routine inspection activity for rule compliance will consist of straightforward 'quick checks' conducted during routine food safety surveillance inspections.

Opportunities to provide training using the curriculum reviewed by the FDA are currently limited due to lack of train-the-trainer courses. HCG plans to attend the next available course so we may assist our clients. We recommend our readers review the available FDA Guidance Material and watch our [website](#) for training this fall.

USDA, FSIS FoodKeeper App

The USDA, Food Safety and Inspection Service (FSIS) has developed a FoodKeeper App that can help you use food while at peak quality and reduce waste. The storage times listed are intended as useful guidelines and are not hard-and-fast rules. Some foods may deteriorate more quickly while others may last longer than the times suggested. The times will vary depending on the growing conditions, harvesting techniques, manufacturing processes, transportation and distribution conditions, nature of the food, and very importantly storage temperatures. Foods should be bought in reasonable quantities and rotated in your pantry, refrigerator, and freezer.

Every year, billions of pounds of good food go to waste in the U.S. because consumers are not sure of its quality or safety. By reducing food waste through buying appropriate quantities, storing foods properly, cooking what is needed and composting, consumers can save money and reduce the amount of food going to landfills.

- Data is available for download ([XLS format](#) | [JSON format](#)).
- Files are also available from [Data.gov](#) (multiple languages and formats).
- [Data Documentation](#) (PDF)

HACCP Certified!



Congratulations to our latest HACCP course participants! We proudly partnered with Midwest Poultry Services, L.P. to conduct this course in Indiana.

Failure to Have Foreign Supplier Verification Plan a Common Inspection Observation

Recently the FoodSafety Tech News reported that during a Food Safety Supply Chain Conference, FDA representatives revealed recent FSVP compliance and enforcement trends.

Food accounts for one-third of the 42 million products imported into the United States each year, according to Andrew J. Seaborn, supervisory consumer safety officer, division of import operations, ORA, FDA. FSMA's risk-based FSVP rule places responsibility on importers to ensure their food is safe, yet since the rule was implemented, the [most common Form 483a observation](#) has been a failure to develop an FSVP. In fact, from FY 2017 to present, the observation was cited 552 times, outweighing any other observation.

Thus far, common citations include:

- No written hazard analysis to identify and evaluate known or reasonably foreseeable hazards
- No written procedures that ensure appropriate foreign supplier verification activities are occurring related to imported food

Seaborn noted several additional “significant observations” related to FSVP inspections, including incorrect entry data, and the absence of documentation in the following areas:

- Approval of a foreign supplier
- Evaluating foreign supplier performance, along with related risks
- Establishing written procedures to ensure foreign supplier verification activities are performed
- Review and assessment of another party's evaluation of foreign supplier performance
- Ensuring food was produced in compliance with low acid canned foods regulations
- Related to meeting the definition of a very small importer, when applicable

HCG can assist importers and companies relying on imported food by providing FSVP training and assistance to develop, implement and maintain a compliant FSVP program. Please [contact HCG](#) for further information.

Best Wishes,

Cathy M. Crawford, President

