HACCP Consulting Group, L.L.C®

Excellence in Food Safety Management

July Newsletter

In this edition...

Training Opportunities

Basic HACCP
- July 23-24, Los Angeles, CA
- August 6-7, Fayetteville, AR
- October 21-22, Florence, KY (Cincinnati)

Advanced HACCP
- September 18-19, Columbus, OH

Developing & Implementing SQF Systems
- October 23-24, Florence, KY (Cincinnati)

SQF Fundamentals
- August 21-22, Cleveland, OH

FSPCA Preventive Controls + HACCP
- August 27-29, Westford, MA
- September 11-13, Cinnaminson, NJ - more info coming soon

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**

NEW SQF Code is Out !

Edition 8.1 of the SQF Code is now available and is to be implemented by September 2. The documents can be found here.

Changes to the food safety codes (for any sector) are minimal and primarily address grammar, formatting, and some clarification. Few, if any, actions are necessary for compliance to the food safety. More significant changes are in the updated Quality Code.

FDA's 'Final Compliance Date' for Animal Food Facilities – Are You Ready?

The U.S. Food and Drug Administration's final compliance deadline is swiftly approaching – September 17, 2019 for those animal food facilities designated as a very small business. These businesses will be required to comply with the preventive controls of the FSMA animal food rules. In FY 2019, the FDA began routine inspections of large businesses focusing on CGMP and preventive controls inspections. In the fall of 2019, FDA will begin inspections of small businesses and very small businesses will be subject to FDA inspections in the fall of 2020.

Need to know more about what is required for your Animal Food production? You should be able to answer these questions about the Animal Food rule:

- How are CGMPs different from preventive controls?
- What is a hazard analysis and am I required to develop one for my animal food operation?
- How do I know if the FDA's Animal Food rule applies to my operation?
- Is my business "small" or "very small"?

If you need help with these or other concerns regarding animal food, HCG teaches the FDA's Preventive Controls for Animal Food course. This course covers the FSMA Animal Food rule and can be provided in a public or private setting. Please contact us at info@haccpcg.com for details on training or consulting.

Pesticide Residues Continue at Safe Levels

HCG previously provided information in our October Newsletter to support your food safety plans regarding its testing program for pesticide residues. At that time, the FDA released its testing report showing overall levels of pesticide chemical residues below the Environmental Protection Agency's tolerances supporting that the risk of pesticide residue does not pose a significant or likely risk to consumers.

This month, HCG is pleased to share similar results from the European Food Safety Authority (EFSA) which published its annual report for 2017. This report shows overall, that 95.9% of 88,247 samples analyzed fell within the legal limits for pesticide residues. Further, it indicates 54.1% of the tested samples had no quantifiable residues. The dietary risk assessment indicated that, for the samples analyzed, the probability of European citizens being exposed to pesticide residue levels that could lead to negative health outcomes is low. The full report can be found here.

HCG reminds our readers of the importance of monitoring chemical hazards of all types and using food safety team resources to focus on those hazards deemed reasonably likely.

Here We Go Again

According to the Food Safety News, the Senate introduced the Safe Food Act, co-sponsored by Senators Dick Durbin and Rep. Rosa DeLauro (see attached). The pair introduced a similar bill in 1999.
The Safe Food Act would establish a single, independent food safety agency, the Food Safety Administration and would consolidate the FDA and USDA food safety functions of inspection, enforcement, labeling and research into the single Agency.

Some of the benefits identified by the Safe Food Act would include:

- Requiring risk assessments and preventive control plans to reduce adulteration;
- Authorizing enforcement actions to strengthen contaminant performance standards;
- Improving foreign food import inspections;
- Requiring full food traceability; and,
- Make it easier for producers, processors, and packagers to comply with federal food safety standards.

It will be interesting to see if this Bill has any better success being passed by Congress then previous attempts – stay tuned.

U.S. Food and Drug Administration Provides Help with the Food Code

The U.S. Food and Drug Administration (FDA) recently released an online training program to promote the use and understanding of the fundamental principles of the Food Code. The FDA Food Code is not a rule or regulation. It is a model recommended by the FDA for the development of regulations for retail food operations (restaurants, grocery stores, and institutions) at the state and local level. It is recognized as scientifically sound and designed to aid in protecting public health and ensuring food offered at retail and food service establishments is unadulterated and safe. It is also a widely recommended resource when developing a HACCP or Food Safety Plan.

This online training can help you interpret the Food Code providing a variety of information to achieve objectives such as to:

- Explain the chapter structure and its function in the Food Code
- Identify Chapter, Part, Sub-part, Section, Paragraph, and Sub-paragraph and how these delineations are used
- Explain how the Code's presentation of requirements by principle rather than by subject makes the Code shorter and provides a logical sequence of topics
- Demonstrate the meaning and use of italics
- Define the three risk designations and demonstrate their use in prioritizing inspections
- Define the terms "shall," "may," "may not," and "means" as well as understand their action plus provide examples
- Identify what type of text alerts the reader to a defined term and describe the importance of definitions
- Describe the importance of the Annexes and their topical content

This training as well as many other Food Code related topics can be found here.

FDA Issues Final Guidance on "Added" Sugars

FDA's regulation updating nutrition labeling includes a requirement to declare added sugars. This created concern because labels on products such as honey and maple would include a statement ("includes x g sugars") that would confuse consumers into thinking honey or maple syrup has added sugar.

Because of this concern, the Farm Bill prohibited the FDA from requiring "includes x g sugar" on single ingredient packages or containers of pure honey, maple syrup and other single ingredient sugars and syrups. Recently, FDA issued final guidance advising what this means for the nutrition facts box.

Single-ingredient products are not required to declare the number of grams of added sugars in a serving of the product on the nutrition facts box but must still include the percent Daily Value (DV) for added sugars. Oddly, this implies the FDA believes it can require declaration of %DV for nutrient (added sugar) that is not declared on the label.

The cranberry industry also raised objections to the new requirements. Cranberry juice

naturally contains little sugar and requires the addition of sugar (or another sweetener). These added sugars must be declared as added sugars.

Other juices (e.g. grape) are naturally sweet and need not be sweetened to be palatable. As a result, consumers comparing the nutrition information of a cranberry juice and grape juice, may avoid cranberry juice; even though the total sugar content of the two juices is similar. One has natural sugar and the other has added sugar.

FDA maintains its position that cranberry beverage products and certain dried cranberry products must declare added sugars in grams as well as the %DV for added sugars. However, FDA will exercise enforcement discretion allowing the use of a symbol linked to a statement explaining that sugars are added to improve the flavor of naturally tart cranberries. FDA provides examples of several possible statements none of which appear to address the total sugar content of the cranberry product vs. the naturally sweeter product.

Overall, FDA is giving manufacturers of single ingredient packages/containers of pure honey, maple syrup, other pure sugars and syrups, and certain cranberry products two years prior to enforcement of the new nutrition labeling requirements. This will give these manufacturers additional time to make label changes consistent with the final regulations, the Farm Bill, and FDA's guidance.

Best Wishes,

Cathy M. Crawford, President

HACCP Consulting Group, L.L.C.| 757-371-5832 | info@haccpcg.com | www.haccpcg.com

STAY CONNECTED