

Leaf through our newsletter for the latest in food safety news...



November Newsletter



Today is for our heroes.

**LET US HONOR
VETERAN'S DAY**

Training Opportunities

[Implementing SQF Systems](#)

December 8-11, Virtual
January 5-8, Virtual

[Preventive Controls for Human Food + HACCP](#)

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FSIS Final Rule for Egg Products' HACCP & Sanitation SOP's

The USDA Food Safety and Inspection Service (FSIS) published its Final Rule to require official plants that process egg products to develop and implement Hazard Analysis and Critical Control Point (HACCP) Systems and Sanitation Standard Operating Procedures (Sanitation SOPs) and to meet other sanitation requirements consistent with FSIS's meat and poultry regulations.

FSIS also posted an Egg Products Hazards and Controls Guide to help plants design and control safer food production systems. The guide identifies the process steps relevant to each process category, lists some potential hazards in the process steps, and cites some of the controls frequently used by processors to address these hazards.

Web site: The October 29, 2020 USDA FSIS Federal Register Final Rule is posted [here](#).

The September 9, 2020 USDA FSIS Egg Products Hazards and Controls Guide is posted [here](#).

The Final Rule also amends 9CFR 590 and other relevant parts of the regulations to:

- Eliminate prescriptive regulations, including those requiring prior approval by FSIS of egg products plant drawings, specifications, and equipment, and replace outdated pasteurization requirements with a performance standard requiring that official plant process egg products to be edible without additional preparation to achieve food safety.
- Change the Agency's interpretation of continuous inspection to provide for the presence of inspectors at official plants at the same frequency that meat and poultry processing establishments are provided inspectors, i.e., at least once per shift.
- Require egg products plants to maintain control of egg products that have been sampled and tested for microbiological public health hazards until the test results become available.
- Apply the egg products regulations to egg substitutes and freeze-dried products and require inspection of these products. To eliminate the prohibition on the use of irradiated shell eggs in the production of egg products and food products containing them.
- Make egg products labeling requirements, including requirements for generically approved labeling and special handling labels, more consistent with the requirements for meat and poultry products, as well as to make changes to labeling requirements for shell eggs consistent with those in the Food and Drug Administration (FDA) regulations.
- Align the import requirements for egg products more closely with the import requirements for meat and poultry products.

Establishments needing assistance to develop, implement and maintain their HACCP and SSOP programs consistent with the new regulations or to meet HACCP training requirements establishments should [contact HCG](#) .

Recently, the Food and Drug Administration published a Fact Sheet outlining what importers may expect during an FDA inspection of their Foreign Supplier Verification Programs (FSVP) ([here](#))

An inspection of the FSVP importer to review FSVP records can occur if: the importer is subject to routine surveillance and follow-up; the importer has an inspectional history that includes a violative inspection and a compliance follow-up inspection is needed to observe voluntary corrections; or, products imported by the FSVP importer are associated with a recall, foodborne outbreak investigation, or complaints. Also, of note, FSVP inspections may also take place remotely.

Under section 1.510(b)(3), if requested in writing by FDA, the importer must send records to FDA electronically, or through another means that delivers records promptly. This section provides the regulatory basis for conducting remote inspections. For a remote inspection, the FSVP records reviewed by the FDA investigator at a site other than the importer's premises.

The Fact Sheet also discusses how to prepare for the inspection, FSVP regulatory records required, the conduct of the inspection, and the exit interview with the most responsible individual on site. If importers need assistance with developing, implementing and maintaining their FSVP in preparation of an FDA inspection please [contact HCG](#).

Reduce the Spread of COVID-19 during the Holidays

According to the CDC, when you celebrate virtually or with your immediate family in your household, you reduce the spread. Indoor gatherings have a higher risk when there isn't ventilation. When gatherings are held outside or there are open doors or windows, the risk lessens. The duration of gatherings also play a part. Attendees should also wear masks, practice social distancing and hand washing. The amount of attendees should also be smaller than normal. Limit contact with surfaces that have been commonly touched and items that have been shared. More information and tips can be found [here](#).

The Big 9 Allergens?

While industry has learned and worked to comply with rules regarding "The Big 8 Allergens" to be declared on certain food labels in the United States, it seems we are on the path toward the Big 9.

The FDA issued a draft guidance for voluntary labeling of sesame to encourage manufacturers to clearly declare sesame in the ingredient list, when it is used as a "flavoring" or "spice" or when the common or usual name (such as tahini) does not specify sesame.

Sesame has been identified as a food allergen, but it is currently not one of the eight major food allergens required by the 2004 Food Allergen Labeling and Consumer Protection Act (FALCPA) to be included in specific allergen labeling. Currently, when sesame is part of a flavoring or spice, it may be declared as simply "spice" or "flavor" without requiring "sesame" to be included. This is not recommended. The FDA is recommending that manufacturers voluntarily declare sesame following the spice or flavor, such as, "spice (sesame)" or "flavor (sesame)." FDA is also recommending if a term is used for a food that is or contains sesame, such as tahini, sesame should be

voluntarily included in parentheses following the ingredient.

While guidance is not law or regulation, HCG highly recommends all manufacturers who handle sesame review their programs and labels to comply.

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