



If it affects you or the meat industry, you'll read about it in the...

AAMPALIFIER

American Association of Meat Processors • One Meeting Place • Elizabethtown PA 17022

Tel: 717-367-1168 • Fax: 717-367-9096 • Email: aamp@aamp.com • www.aamp.com

AUGUST 15, 2011

JAY B. WENTHER, PH.D.
EDITOR

The Release of HACCP Validation Information Is Looming



Meat processors beware...although the talk regarding “HACCP Validation” has been quiet for many months now, the issue is not dead. On August 3, 2011, the U.S. Department of Agriculture’s Secretary, Tom Vilsack, spoke before the annual conference of the International Association for Food Protection on the USDA’s focus on food safety. Vilsack covered a variety of topics from the Agency’s traceback policy and STEC non-O157 strains of *E. coli* to pre-harvest food safety strategies and HACCP validation. The Obama administration continues to be committed to food safety and steps to improve the public health. Overall, the administration is striving to improve and modernize the food safety system based on prevention. According to Vilsack, this year, one

in six Americans will get sick from foodborne illness, 128,000 Americans will end up in the hospital, and, 3,000 Americans will die from foodborne illness.

Vilsack made direct statements regarding the issue of HACCP validation. The following statements are excerpts from the transcript of his remarks as prepared for delivery (*USDA Release No. 0335.11*):

We are looking at HACCP validation – put simply – making sure that food safety plans can work in theory, and do work in practice.

Last year, FSIS issued a draft of guidance to help plants validate their food safety, or HACCP, plans. We think this guidance will help establishments – especially small and very small establishments – with practical advice they can use to verify that they’re meeting the food safety standards we’ve set for them.

Why? Because we believe that when more establishments can actually prove that their HACCP plans are working – when they can show it through in-plant observations, or data, or measurements – that there will be less contamination of products in the plant.

We have received comments on the draft guidance, and expect to publish an updated version within the next few months.

But we’re not only looking at what industry can do under HACCP to better protect public health, we’re examining what we can do. We want to take the lessons learned over the 15 years of experience with HACCP and apply those lessons to improve the system.

After all, HACCP is the very foundation of our current inspection system. We need to make certain that it meets modern expectations. So I’ve directed FSIS to develop a package of administrative actions that do just that. I know that the meat and poultry industry wants and needs this type of clarity to our HACCP regulations.

AAMP has been awaiting the second draft of the HACCP validation guidance since AAMP submitted comments on the issue over a year ago. It is really difficult to have a discussion or debate the details of the issue if all parties don’t have access to the document. Therefore, we wait. AAMP respectfully disagrees with some of Vilsack’s comments. It is understandable that if a new HACCP plan is implemented, an unusual process is incorporated into production, or if an establishment is producing a unique type of product (e.g., non-thermally processed RTE sausage) that lacks scientific supporting documentation...some type of “validation” may be necessary. On the other hand, a decade after HACCP was implemented, the Agency has taken the position that establishments have been operating HACCP and food safety programs in a theoretical position. It is difficult to follow this logic.

The Release of HACCP Validation Information Is Looming (*Continued*)

Through the years, the Agency has provided a variety of guidance documents. Much of the industry has viewed it as such...guidance. Unfortunately, sometimes guidance becomes Agency and inspection personnel minimum expectation and enforcement takes place. There is also the inherent inconsistency of inspection that is bound to play a role in this validation issue. What is acceptable in one FSIS District, may not be in another...what is acceptable in one year, may not be acceptable in the future, thus leading to frustration and confusion.

Within Vilsack's remarks, he made several other statements. He specifically made it clear that USDA is not looking to, nor interested in, expanding USDA jurisdiction on the farm in regards to pre-harvest food safety interventions. Yet, he also commented, "to truly improve food safety – to fight pathogens at every critical point before they reach consumers – will take a true farm-to-fork effort to combat them. And we will all have to work together to get it done." The farm-to-fork slogan is a good theory; but as everyone recognizes, the Agency can't control either side of that theory...the farm nor the fork. The Agency does have jurisdiction over the meat industry, and they are focusing their regulatory efforts toward that entity. Unfortunately, the Agency has never identified any specific food safety issue that the readdressing of HACCP and food safety plan validation will resolve.

It seems ironic that Vilsack made these statements on the same day that Cargill Meat Solutions Corporation announced their recall of approximately 36 million pounds of ground turkey products that may be contaminated with a multi-drug resistant strain of *Salmonella* Heidelberg. Nearly every news report on the issue included the comment that, even though the ground turkey may be contaminated, the ground turkey is safe to eat if properly handled and properly cooked. This is certainly a change in reporting a meat and/or poultry recall. Is the media finally holding others accountable besides just the meat processor? It has long been the opinion of many that consumers need to be educated to act responsibly in their handling, preparation, and cooking of meats.