



# Capitol LINE-UP

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

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

April 15, 2010

Editor: Jay B. Wenthler, Ph.D.

---

## ***HACCP Validation Guidance Update***

Since publishing the April 1, 2010, edition of the Capitol Line Up, it has been an extreme environment around the AAMP office, to say the least. AAMP has been continually posting new information on the dedicated webpage for Validation of HACCP Systems at [www.aamp.com/Validation.php](http://www.aamp.com/Validation.php), talking with other meat industry trade associations, and discussing the issue with Agency officials.

On March 23, 2010, AAMP respectfully requested that the Food Safety and Inspection Service (FSIS) extend the comment period regarding the draft compliance guide on HACCP systems validation that was released by the Agency through the FSIS Constituent Update (Volume 12, Issue 10) on March 19, 2010. Numerous other national meat and poultry industry trade associations submitted similar extension requests. Recently, FSIS Administrator Alfred Almanza approved and clarified the extension period. A 60-day extension period was granted and will begin after the original April 19, 2010 deadline. **This would make the comments due by June 19, 2010.** After that date, FSIS will begin its review on the comments it receives and its process of deciding how it will proceed with respect to the validation of HACCP systems.

AAMP and eight other national meat and poultry trade associations met with Agency officials again on April 5, 2010, to further discuss the validation issue. In a consolidated voice, the associations explained that the FSIS' recent Draft Guidance on HACCP Systems Validation represents a drastic shift in policy as it related to the Agency's expectations on validation of HACCP systems. We relayed the message that within the ambiguously written document, the associations and the industry have the perception that FSIS seemingly expects microbial testing to validate all processes, regardless of whether the process is well-recognized scientifically as valid and effective. Furthermore, FSIS has not been able to articulate why a policy change is needed, a clear food safety problem, or any public health benefit that will be achieved if the non-scientific new policy is adopted.

AAMP continues to STRONGLY advise that you take the time to review the information provided and COMMENT appropriately. FSIS Administrator Al Almanza asks for comments on this draft validation compliance guide. Submit your comments by:

Email address: [DraftValidationGuideComments@fsis.usda.gov](mailto:DraftValidationGuideComments@fsis.usda.gov)

Mail: Docket Clerk, USDA, FSIS, Room 2-2127, 5601 Sunnyside Avenue, Beltsville, MD 20705

### ***HACCP SYSTEM VALIDATION INFORMATION AVAILABLE***

***If you have not read the April 1, 2010, edition of the Capitol Line-Up on HACCP system validation, it is strongly recommended that you do so. AAMP has created a webpage ([www.aamp.com/Validation.php](http://www.aamp.com/Validation.php)) to provide the meat industry more information and help keep you up-to-date with this validation issue. Sample letters are available for you to use as a guide if you choose to comment. An EXCEL spreadsheet is also available so you can determine your estimated cost associated with all this potential microbiological testing. Feel free to share this information with fellow processors. Submit your comments by June 19, 2010.***