



# Capitol LINE-UP

American Association of Meat Processors  
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## **HACCP Validation Guidance Update**

AAMP has continued to diligently work on the validation issue; and throughout AAMP's travels to Affiliate conventions, we are spreading the word to other meat processors and individuals that may not have been fully exposed to the issue. There continues to be many processors that have not heard about the issue or read the information provided. Oftentimes processors don't believe the Food Safety and Inspection Service (FSIS) will actually follow through with this initiative, since it would be so financially burdensome. AAMP is here to tell you that FSIS *will* go forward with this validation initiative, regardless of the financial burden, *if* processors don't take the time to submit comments and get vocal about the issue.

Processors are not the only group that is getting vocal about the validation issue. AAMP has spoken with several state meat inspection directors and they have shown concern at the direction FSIS is headed. State meat and poultry inspection programs are typically characterized as providing more personalized guidance to establishments in developing their food safety oriented operations. They also seem to have a better understanding of the industry that they regulate and understand the potential impact of the validation initiative, depending on how it is interpreted and implemented.

The Iowa Agriculture Secretary, Bill Northey, recently expressed his concern on the validation requirements in a letter addressed to U.S. Secretary of Agriculture Tom Vilsack, in which he recognized that the validation initiative could hurt small meat processors financially without improving food safety. Northey also questioned the validity of FSIS issuing the draft guidance as a re-interpretation and not a new rule, as that does not follow the same rule making process or allow for the same scrutiny as typical regulatory changes. In particular, he noted, there is no opportunity to have this new interpretation reviewed by the Small Business Administration to determine the financial impact on small businesses.

As AAMP has spoken with numerous processors, organizations, and media, there are frequent comments made that this is a large meat industry versus a small meat industry issue, or this issue is somehow driven by the large meat processing industry. Thus far, this is not the case. The validation issue is a meat industry issue, regardless of business size. Trade organizations representing some of the largest meat and poultry industries in the U.S. are opposed to the validation initiative just as much as AAMP is, and we are all working together to come to a workable solution.

There is still plenty of time for you to get actively involved with this issue. It is strongly recommended that you provide constructive comments regarding the draft validation guidance and the overall potential impact to your business. Don't stop at that point. Share your message with your state and local representatives. AAMP continues to STRONGLY advise that you take the time to review the information provided and COMMENT appropriately. 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 information regarding 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.*