



# Capitol LINE-UP

American Association of Meat Processors  
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June 1, 2010

Editor: Jay B. Wenthler, Ph.D.

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

As independent meat processors, your voice is being heard. At this point, AAMP has had many discussions with a variety of legislative staffers that have contacted the AAMP office requesting further clarification on the validation issue. This is a very complex issue, and while the release of the validation fact sheet by the Food Safety and Inspection Service (FSIS) was meant to add clarity, it also added some confusion.

Many processors have contacted AAMP confused and skeptical because the fact sheet and other Agency statements imply that no microbial testing is going to be required while the actual Draft Guidance on HACCP Systems Validation clearly states in several locations that microbiological test results would be a portion of the recorded documentation that inspection personnel would review before the establishment receives the official stamp of validation approval.

Establishment should understand that the FSIS validation fact sheet seems to focus on FSIS Appendix A (*lethality*) and Appendix B (*stabilization*). Don't forget about all of your other HACCP plan categories that don't utilize Appendix A and Appendix B. At this point, it is still unknown what the Agency will expect for validation information when an establishment has identified zero tolerance and/or microbial intervention sprays as critical control points in slaughter HACCP plans or product temperature monitoring as critical control points in a raw, ground HACCP plan.

AAMP has heard the comment several times that this validation guidance "is not new regulation," "is not a regulation" and "microbial testing is not required." That all sounds great on the surface, but some in the meat industry understand how quickly "guidelines" become minimal Agency "expectations" and in the absence of any other supporting documents available to present to FSIS (*which in some cases none exist*), microbial sampling data may be the only data that will satisfy those expectations.

A perfect example is already in front of us. Inspection personnel continue to tell establishments "you don't have to test for *E. coli* O157:H7 in your ground beef...it's not a regulatory requirement." At this time, it is difficult to identify many federally inspected establishments producing ground beef that can satisfy Agency expectations without having an *E. coli* O157:H7 testing program. So, although it may not be "required by regulation," at times it gets imposed with the do-it-or-else mentality. Could the same thing occur with this validation guidance?

The proof will be in the final validation guidance document and in the implementation of this issue. Again, the Agency seems to have acknowledged that no microbial testing would be expected when it comes to the use of Appendix A and Appendix B. But, will the Agency be just as forthcoming when it comes to slaughter and fresh meat processing HACCP plans? Only time will tell.

Unfortunately, if this becomes a plant-by-plant or case-by-case issue and not a meat industry issue, this could be a significant cause of confusion and frustration...pushing more establishments to opt out of inspection.

### ***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. Utilize the information AAMP has provided to make constructive comments. Feel free to share this information with fellow processors. Submit your comments by June 19, 2010.***



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