



# 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

July 1, 2010

Editor: Jay B. Wenthler, Ph.D.

---

## ***HACCP System Validation Update***

Shortly before the conclusion of the validation comment period, AAMP submitted 13 pages of comments to the U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS). Since the Agency publically released the Draft Guidance on HACCP System Validation on March 19, 2010, AAMP has remained actively involved in collecting information to develop constructive comments. If you would like to view the comments AAMP submitted, they have been posted at [www.aamp.com/Validation.php](http://www.aamp.com/Validation.php). As of June 10, 2010, the Agency had received 1,924 comments.

Although the Agency currently is making statements that "they [the draft validation guidance] do not impose new testing or microbiological requirements on establishments," the proof will be evident when the document is fully published and implementation is established by Agency personnel. Most likely, the microbiological testing component will be clearly known as not being "required," but Agency actions will dictate whether microbiological testing is "expected" to the point where it is the only data that inspection personnel will accept to fully acknowledge that an establishment has provided adequate validation information.

From a timeline perspective, the Agency is currently in the process of reviewing the comments; and from Agency statements, the guidelines would be "significant changes" to the validation policy clarifications. As the June 19, 2010, public comment period concluded, from press releases it appears as though the Agency has the lofty goal of reviewing all of the comments and making revisions to the validation guidance document in slightly over one month. Due to the complexity of this validation issue, AAMP encouraged the Agency to take the appropriate time needed to provide clear and concise guidance to the meat industry. AAMP looks forward to reviewing the revised draft validation guidance document when it becomes available, as well as working with the Agency to provide the meat industry with achievable expectations. AAMP strongly encouraged the Agency to provide more than a 30-day comment period in regards to the second draft of validation guidance. The 30-day comment period is simply not enough time to make the information available to the affected stakeholders and provide constructive comments to such a complex issue.

AAMP recommended a working relationship between the meat industry and the Agency to create guidance documents in the future. We all may not always agree on the guidance to provide, but guidance should be realistic and achievable. The current process of allowing the meat industry to properly comment ensures that more accurate industry guidance is provided, and AAMP asked the Agency to repeat this practice in the development of future guidance documents.

The Agency and the meat industry may be better served if establishments focused their reassessment activities at the end of this year on ensuring that the scientific supporting documentation identified within HACCP food safety systems relates to the hazard that is being controlled, and that all pertinent critical parameters of the scientific supporting documentation are identified. This aspect seems much more beneficial than performing non-science based indicator organism testing.

AAMP supports the clarification of food safety issues and appreciated the opportunity to comment on the Draft Guidance on HACCP System Validation. It is extremely important that if the Agency provides guidance to the meat industry, that guidance should be clear and concise. Specific examples within the guidance documents are always extremely helpful, as long as they are related to the affected industry (*i.e.*, very small and small independent processors). The guidance should not consist of unrealistic expectations that create excessive burdens, depending on how they are implemented or potentially misinterpreted/manipulated by Agency inspection personnel.