

INDEPENDENT PROCESSOR

SERVING SMALL AND MIDSIZE MEAT, POULTRY, AND GAME PROCESSORS

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HACCP PLAN VALIDATION ISSUE REQUIRES YOUR ATTENTION AND COMMENTS ARE NEEDED

The American Association of Meat Processors (AAMP) wants to make you aware that on March 19, 2010, FSIS published Draft Guidance on HACCP System Validation and asks for the industry to comment. FSIS made available three documents on the validation of HACCP systems on its website at http://www.fsis.usda.gov/PDF/HACCP_Validation_Ltrs.pdf. You can also easily download this information as well as associated useful information regarding this issue from the AAMP website (www.aamp.com).

FSIS is encouraging the enumeration of indicator organisms along with additional side-by-side pathogen positive/negative detection testing to gather data about the identified organisms of concern in the hazard analysis. The validation guidelines identify that establishments should collect microbial data for at least one product from each HACCP category utilized. Unfortunately, due to specie and process differences of the variety of products produced by the independent meat processing businesses in the U.S., this may require the industry to potentially validate essentially all products produced. Depending on the FSIS interpretation of this guidance information, the potential microbiological testing that may be required by this validation initiative would be extremely costly to all meat processors and be a specific huge financial burden for the very small and small independent processors that make a wide variety of meat products.



Food safety has been a top priority for independent processors not only since the implementation of HACCP, but long before HACCP was implemented. The overall purpose of HACCP was prevention of harmful pathogens that could potentially be associated with meat products. It seems as though the Agency is continually reverting to excessive end product microbiological testing of meat products to control pathogens instead of relying on the established HACCP food safety systems. HACCP is controlling the process rather than attempting to test safety into the system. There are several well-recognized, long-standing processes and supporting documents which, when followed, result in the production of safe meat products.

Fortunately, FSIS Administrator Al Almanza asks for comments on this draft validation compliance guide. Submit your comments to the email address DraftValidationGuideComments@fsis.usda.gov or to the Docket Clerk, USDA, FSIS, Room 2-2127, 5601 Sunnyside Avenue, Beltsville, MD 20705. Comments should be submitted by April 19, 2010. If you read this article after that date, AAMP still encourages you to submit comments. After April 19th, 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