

# Small Plant NEWS

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## Small Plant NEWS

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## Outreach to Small Plants

### Plants Served in Many Helpful Forms

By Keith Payne

Since the United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) established the Office of Outreach, Employee Education, and Training (OOEET) in March 2008, this new office has continued to develop and refine the tools and information you need to help you operate and produce safe products for your customers. It's a tremendous challenge given the diverse needs of over 5,000 federally inspected small and very small plants and nearly 2,000 State-inspected plants.

The common trait these plants share is less access to technical and educational resources compared to large plants. OOEET is committed to reducing that gap so small and very small plants can operate on a more level playing field with the larger ones.

OOEET Assistant Administrator Dr. Karlease Kelly and a staff of about 60 employees provide a variety of services to assist small and very small meat, poultry, and egg processing plants. "Our goal is to provide industry timely guidance and information, using a range of methodologies comparable to what our own employees receive," said Kelly. "That way we can ensure continuity and consistency in the understanding and application of FSIS' policies."

The guidance and methodology provided to small plants comes in



**Gregory Brookhouser speaking at a recent FSIS regulatory education workshop. (FSIS Photo)**

the form of educational Web-based seminars, materials, and videos for small and very small plants, regulatory education sessions that bring inspectors and industry together, and this newsletter. OOEET also distributes technical information and guidance to small and very small plants through direct mail.

"Our printed materials and videos are designed to help you understand how you can improve your food safety systems," added Kelly. "We developed a variety of Hazard Analysis and Critical Control Point (HACCP) and food safety resource and guidance materials and distributed many of them directly to more than 7,500 plant owners and operators, as well as State HACCP coordinators and other partners."

In addition, over 25,000 pieces were mailed out in the past year in response

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# Designing Your HACCP Plan, Overcoming Common Pitfalls

By Ellyn Blumberg

In the June, July, and August issues of *Small Plant News*, we featured the first three parts of a four-part series on *Designing Your Own HACCP Plan*. This month we complete the series by focusing on overcoming common pitfalls.

**H**ACCP, it's essential right? Follow the seven principles:

1. conduct a hazard analysis,
2. identify critical control points, 3. establish critical limits,
4. determine monitoring procedures, 5. create corrective actions, 6. institute recordkeeping procedures and set up verification procedures, 7. validate your plan, and reassess it as needed. But what if you succumb to some common pitfalls? How can you overcome or prevent them? In this article we'll discuss overcoming common pitfalls and some resources for more information.

## Pitfall #1

One of the common pitfalls in an HACCP plan is that a hazard that is reasonably likely to occur for a process was missed in the hazard analysis. This can happen for a number of reasons, but to avoid missing likely hazards be sure to review the FSIS generic HACCP plans and the FSIS guide *Microbiological Hazard Identification Guide for Meat and Poultry Components of Products Produced by Very Small Plants*. Both this guide and the generic HACCP plans are available on FSIS' Web site at [www.fsis.usda.gov](http://www.fsis.usda.gov).

You may also find HACCP resources available on the International HACCP Alliance and University Extension Service Web sites like those at Kansas State University, Ohio State University, and University of Wisconsin. These sites often have specific information available that can help you identify potential hazards.

State HACCP Contacts and Coordinators can also provide technical advice, assistance, and resources, and can conduct activities to support HACCP implementation in small and very small plants. A listing of each State's HACCP Contacts and Coordinators is available on FSIS' Web site or you can call FSIS' Policy Development Division at (800) 233-3935 for technical assistance in identifying your hazards.

## Pitfall #2

Another common pitfall in an HACCP plan is having insufficient documentation to support your hazard analysis. Owners and operators must take the information provided



An FSIS inspector collects a sample. (USDA photo)

through research articles, technical assistance, or guidance materials and modify it to apply to their operation appropriately.

For example, a plant might have a hazard analysis citing a scientific article as the justification for why a hazard is not reasonably likely to occur, but then there is no scientific article on file to support that hazard analysis decision. This can

be resolved by locating a copy of the article and ensuring that you have records to demonstrate that your process is capable of the key parameters in the scientific article.

## Pitfall #3

Sometimes the critical control point's critical limit for a microbial intervention does not reflect the key parameters that the plant used from published research articles. In these cases, carefully review the methods of the research article to determine the key parameters. You must ensure that the proper concentration of the antimicrobial, temperature of the antimicrobial, and amount of the antimicrobial is applied to a given product's surface area. When in doubt, contact the article's author about what the key parameters are and how they should be reflected in the critical control point's critical limit.

## Pitfall #4

The fourth common pitfall occurs at the last HACCP principle — verification. Occasionally, an HACCP plan does not contain all three ongoing verification activities, which are calibration of monitoring equipment, direct observation of monitoring procedure(s), and records review. If any of the three required verification activities are not performed at a particular critical control point, then the plant should be able to support the decision. In other words, the plant should not just arbitrarily decide which activities to perform at each critical control point. The plant should use a rational thought process.

Remember, designing and following a successful HACCP plan helps protect public health. It makes good business sense. FSIS has a wealth of food safety materials in printed and electronic forms that are offered to the public free of charge. Most resource materials are offered in both English and Spanish. For additional information on an HACCP plan, visit FSIS' Web site at [www.fsis.usda.gov](http://www.fsis.usda.gov) or call (800) 366-3747.

## Food Safety Resources

By Sally Fernandez

**D**id you know there's a nationwide network of HACCP experts to help you? FSIS maintains a listing of *HACCP Contacts and Coordinators* for each State, the District of Columbia, Puerto Rico, and the Virgin Islands. The network was established in 1999 to provide assistance to small and very small plants in meeting the requirements of the Pathogen Reduction/HACCP Systems final rule. The contact is generally a representative of the State government. Coordinators are frequently affiliated with universities or agricultural extension programs. These experts work together to combine resources, provide technical guidance and information on training and resources.

The State *HACCP Contacts and Coordinators* list is available on FSIS' Web site at [www.fsis.usda.gov/Contact\\_Us/State\\_HACCP\\_Contacts\\_&\\_Coordinators/index.asp](http://www.fsis.usda.gov/Contact_Us/State_HACCP_Contacts_&_Coordinators/index.asp). You may also type "HACCP Contacts and Coordinators" in the Search box. Names, telephone numbers, and e-mail addresses are listed by State. For further assistance contact the Office of Outreach, Education and Employee Training at (800) 336-3747.

# Take 10 for Labels

By Mary Gioglio

**T**he next time you're preparing a label for a product and are ready to submit it to FSIS for approval, take ten! That's an extra ten minutes to review the 10 most common mistakes made on labels. Compare the contents of your label to the list below to make sure that all of the required information is included. Ten minutes now will save you a great amount of time in the future if you have to resubmit your label because it's been sent back to you unapproved due to errors.

Here is a listing of the 10 most common mistakes made on labels that FSIS has encountered when reviewing label applications.

1. There are problems with ingredient statements:
  - ✓ Single ingredients are not listed by common name (e.g., oil declared instead of vegetable oil, soy declared instead of soy flour, MSG declared instead of monosodium glutamate).
  - ✓ Component ingredients are not listed by common name (e.g., cheese declared instead of imitation cheese; ham declared instead of ham water added; beef declared instead of seasoned beef and binder product).
  - ✓ The order of predominance in the ingredients statement is incorrect.
  - ✓ There are ingredients declared in the ingredients statement that are not in the formulation and vice-versa.
  - ✓ Multi-ingredient components are missing their sub-listings.
2. The formulation, processing procedure, and/or supporting documentation do not agree with, or validate, the information and/or claims on the label (e.g., a "lemon, thyme, pepper" claim on the label but the formulation does not indicate that the spices contain thyme and pepper).
3. Either the entire label is illegible or portions of the label are illegible.
4. The label is incomplete because all required labeling features are not provided.
5. Product standards are not met.
6. The product name is incorrect (e.g., "BBQ" on the label of a sauce with beef product, yet, standard 9 CFR 319.80 or 319.312 is not met).
7. The product name word size is incorrect. This means that no word in a product name (i.e., a common or usual name, a standardized name, or a descriptive name) should be printed in letters that are less than one-third the size of the largest letter used in any other word of the product name.
8. A geographical claim is used on the label but the product is not actually produced in the claimed location (e.g., "St. Louis Toasted Breaded Beef Ravioli" on labeling of product manufactured in Portland, Oregon).
9. There are problems with nutrition facts:
  - ✓ The serving size is incorrect.
  - ✓ The servings per container are incorrect.
  - ✓ The wrong format is used.
  - ✓ There is improper rounding of the values.
10. Undefined nutrient content claims are used (e.g., leaner, low carbohydrates, very low in fat).

Remember, taking a little extra time to review your labels before they are submitted for review can save you a significant amount of time later. Better yet, see if the label you are planning to send in to FSIS for review can be generically approved. If you have any labeling questions, visit *askFSIS* on FSIS' Web site, [www.fsis.usda.gov](http://www.fsis.usda.gov), or contact the Labeling and Program Delivery Division at (202) 205-0623.

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to individual requests. These publicly available materials, which include a new DVD on how to develop a food defense plan, are listed in OOEET's Resources Brochure, which is available online at: [www.fsis.usda.gov/PDF/HACCP\\_Resources\\_Brochure.pdf](http://www.fsis.usda.gov/PDF/HACCP_Resources_Brochure.pdf).

And if you, or someone you know, are thinking about starting up a new meat, poultry, or processed egg products plant, or want to convert from State to Federal inspection, there is a wealth of information on FSIS' dedicated Web page for small and very small plants at [www.fsis.usda.gov/Small\\_Very\\_Small\\_Plants/index.asp](http://www.fsis.usda.gov/Small_Very_Small_Plants/index.asp). Here you'll find a "start-up" package for new plants and an interactive session that allows you to order materials and ask questions. Since its launch, this Web page alone has had over 16,000 visits.

To complement OOEET's resource center approach on FSIS' Web site, there are the training and workshops that the division's trainers take out on the road. Training Operations Branch Chief Dr. Gregory Brookhouser manages a team of 22 regional public health coordinators who are responsible for delivering training

courses not only for FSIS employees, but also industry. His team serves as subject matter experts for processed, canned, and imported meat, poultry, and processed egg products.

"Our strategy is to provide the access and resources needed to support continuous education for small and very small plants, and ensure that our employees and food safety partners have the necessary training that equips them to assist in outreach activities effectively," said Brookhouser.

In fiscal year 2007, FSIS held 36 regulatory education sessions attended by nearly 900 participants. The ratio of participants was 60 percent from industry and 40 percent from Federal and State inspection personnel.

"We want these sessions to be on the cutting edge to address the issues that affect you most," added Brookhouser. "For instance, this past year, we've conducted workshops on FSIS' recent policies related to the control of *E. coli* O157:H7 in beef. This topic has been dominant in the food safety arena recently, and there is much at stake with consumer safety and a plant's reputation and survival if it is processing beef."

To find out more about what is offered through these regulatory sessions, go to [www.fsis.usda.gov/](http://www.fsis.usda.gov/)

[News\\_&\\_Events/Outreach\\_Sessions\\_SVS\\_Plants/index.asp](#). At this site, you can sign up for the sessions of your choice.

These services are just a small sample of all the outreach activities that OOEET carries out to ensure that you are able to gain an understanding of the scientific, technical, and regulatory information needed to develop your food safety and food defense systems. Every employee in OOEET will do his or her best to serve your needs. It's clear that training and education are critical to ensure that public health is protected, and through the numbers and data provided above, they provide FSIS with a gauge of how well it's serving you...well, only partly.

To get a more accurate measure of Agency performance, OOEET needs your feedback on what it can do to serve your needs better. Also look at future issues of *Small Plant News* for tips and ideas that small plant owners and operators would like to share with others on how to produce a safer product. If you have some tips and ideas that you would like to share, or simply have comments, e-mail OOEET through [SmallPlantNews@fsis.usda.gov](mailto:SmallPlantNews@fsis.usda.gov) or call (800) 336-3747.

## Commonly Asked Question & Answer

**Q.** What is an instructional or disclaimer statement concerning *E. coli* O157:H7?

**A.** An instructional statement concerning *E. coli* O157:H7 is a statement that addresses how the product should be prepared or handled to ensure that the pathogen is eliminated or reduced to an undetectable level. Examples of instructional statements concerning *E. coli* O157:H7 in raw ground beef components, raw beef patty components, and raw ground beef products may include, "for full lethality treatment" or "for cooking only." "Cooking" is applying heat to a product at a

sufficient temperature and for a sufficient period of time to eliminate *E. coli* O157:H7 or reduce the pathogen to an undetectable level, and "full lethality treatment" may be cooking or another process that eliminates *E. coli* O157:H7 or reduces the pathogen to an undetectable level, such as fermentation or salt curing.

A disclaimer statement concerning *E. coli* O157:H7 is a statement regarding the type of verification activities addressing the pathogen that were NOT used in the production of the product. An example of a disclaimer statement concerning *E. coli* O157:H7 is, "product has not been tested for *E. coli* O157:H7."