USDA

District Correlation Meeting
July 14, 2011

FSIS Notice 35-11

VERIFICATION ACTIVITIES RELATED TO THE USE OF INGREDIENTS

OF PUBLIC HEALTH CONCERN

USDA

Labeling and Program Delivery Division
Food Safety and Inspection Service (FSIS)

Recalls

- Recalls in 2009 and 2010 associated with undeclared allergens are 14 and 18, respectively

- In the first half of 2011, there have been 26 recalls for undeclared ingredients; 19 of which were because of undeclared allergens. These recalls for undeclared allergens reflect potential public health hazards

- Many of the recalls occurred as a result of a change in product formulation by the establishment or a change in a supplier's ingredient formulation that was not reflected on the labeling of the finished meat or poultry

Recalls (Cont.)

- The occurrence of a recall due to undeclared ingredients indicates that an establishment has failed to:

    - address the chemical (allergen) food safety hazard in its hazard analysis,

    - failed to support the decision in the hazard analysis,

    - failed to reassess the hazard analysis, or

    - failed to effectively implement the controls to support the decision (see 9 CFR 417.2, 417.3, 417.4, 417.5, 417.8)

Big "Eight Allergens"

- Include:
  - wheat,
  - *Crustacean shellfish (e.g., shrimp, crab, lobster),*
  - *Eggs,*
  - *fish,*
  - *peanuts,*
  - *milk,*
  - *tree nuts (e.g., almonds, pecans, walnuts), and*
  - *soybeans.*

What Establishments Should Consider

- Consider the potential for incorrectly formulating or mislabeling such as ensuring that a supplier's ingredient statement has not changed without notice

- Ensure that the appropriate label is applied to each product

- Ensure that the product is manufactured in accordance with the product formula in the labeling record

What Establishments Should Consider (Cont.)

- Ensure that effective sanitation measures are in place to address the potential for cross-contamination when formulating multiple products with different formulations (e.g., prerequisite program, targeted Sanitation SOP procedures)

Websites

- Food Safety Inspection Service

   http://www.fsis.usda.gov/

- Labeling and Program Delivery Division

   http://www.fsis.usda.gov/About_FSIS/labeling_&

   __consumer__protection/ index.asp

- Code of Federal Regulations

   http://www.access.gpo.gov/nara/cfr/cfr-tablesearch.html

- FSIS Food Standards and Labeling Policy Book

   http://www.fsis.usda.gov/OPPDE/larc/Policies/Labeling_Policy
   Book_082005.pdf

Questions?