

Crisis Control Newsletter

Crisis Control Newsletter from RQA, Inc.—An XL Catlin Preferred Provider to Foodservice, Food Processing and Consumer Products Industries

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HACCP

The first step in building a comprehensive food safety management system is to implement an effective HACCP (Hazard Analysis and Critical Control Point) program and have prerequisite programs in place to control hazards and prevent product contamination. Every company that manufactures, processes or handles food products should have a HACCP program in place to eliminate or mitigate food safety hazards. Companies should also be aware of the regulatory requirements to have a HACCP program in place.

HACCP is a management system in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement and handling, to manufacturing, distribution and consumption of the finished product. For a successful HACCP program to be properly implemented, management must be committed to a HACCP approach and include education and training of employees. Benefits, in addition to enhanced assurance of food safety, are better use of resources, improved quality and consistency, timely response to problems and reduced liability.

HACCP is an effective and rational means of assuring food safety from harvest to consumption. Preventing problems from occurring is the paramount goal underlying any HACCP system. Seven basic principles are employed in the development of HACCP plans that meet the stated goal. These principles include:

1. **Hazard analysis**—identify all potential hazards for the product or process
2. **CCP identification**—an essential step where control can be applied to a critical control point to prevent or eliminate a food safety hazard or reduce it to an acceptable level
3. **Establishing critical limits**—a maximum or minimum value for a food safety hazard that must be controlled at a CCP to prevent, eliminate or reduce the hazard to an acceptable level, i.e., time, temperature, pH, humidity, etc.
4. **Monitoring procedures**– scheduled or continuous testing of the control parameters at CCPs to ensure that critical limits have not been breeched
5. **Corrective actions**—when a control limit is breeched, corrective action is taken to bring the process back in control
6. **Verification procedures**—verify and demonstrate that the written plan is effective, CCPs are sufficient to prevent food safety hazards and hazards are being controlled at CCPs
7. **Record-keeping and documentation**—a documented HACCP plan addressing the 7 principles and record keeping that provides evidence that the plan is performing adequately to prevent food safety hazards.

HACCP plans should be prepared for each process or product. Under such systems, if a deviation occurs indicating that control has been lost, the deviation is detected and appropriate steps are taken to reestablish control in a timely manner to assure that potentially hazardous products do not reach the consumer.

Prerequisite Programs

The production of safe food products requires that the HACCP system be built upon a solid foundation of prerequisite programs. Each segment of the food industry must provide the conditions necessary to protect food while it is under their control traditionally through the application of cGMPs. These conditions and practices are now considered to be prerequisite to the development and implementation of effective HACCP plans. Prerequisite programs provide the basic environmental and operating conditions that are necessary for the production of safe, wholesome food. Common prerequisite programs may include, but are not limited to:

Facilities—The establishment should be located, constructed and maintained according to sanitary design principles. There should be linear product flow and traffic control to minimize cross-contamination from raw to cooked materials.
Supplier Control—Each facility should assure that its suppliers have in place effective GMP and food safety programs. These may be the subject of continuing supplier guarantee and supplier HACCP system verification.
Specifications—There should be written specifications for all ingredients, products, and packaging materials.
Production Equipment—All equipment should be constructed and installed according to sanitary design principles. Preventive maintenance and calibration schedules should be established and documented.
Cleaning and Sanitation—All procedures for cleaning and sanitation of the equipment and the facility should be written and followed. A master sanitation schedule should be in place.
Personal Hygiene—All employees and other persons who enter the manufacturing plant should follow the requirements for personal hygiene.
Training—All employees should receive documented training in personal hygiene, GMP, cleaning and sanitation procedures, personal safety, and their role in the HACCP program.
Chemical Control—Documented procedures must be in place to assure the segregation and proper use of non-food chemicals in the plant. These include cleaning chemicals, fumigants, and pesticides or baits used in or around the plant.
Receiving, Storage and Shipping—All raw materials and products should be stored under sanitary conditions and the proper environmental conditions such as temperature and humidity to assure their safety and wholesomeness.
Traceability and Recall—All raw materials and products should be lot-coded and a recall system in place so that rapid and complete traces and recalls can be done when a product retrieval is necessary.
Pest Control—Effective pest control programs should be in place.

Other examples of prerequisite programs might include quality assurance procedures; standard operating procedures for sanitation, processes, product formulations and recipes; glass control; procedures for receiving, storage and shipping; labeling; and employee food and ingredient handling practices.

Food and Drug Administration Recalls (www.fda.gov)

Product: Parmesan Cheese
Incident: Possible Health Risk–Undeclared Allergen

A Fairfield, NJ firm is recalling 30,200 lbs. of grated parmesan cheese because it may contain undeclared egg allergen. People who have an allergy or sensitivity to eggs run the risk of serious or life threatening allergic reaction if they consume this product. The product was distributed in MA, CT, RI, NY, NJ, PA, DE, MD, VA, NC, GA, FL and OH. It was sold exclusively through a wholesale club retailer in 1.25 lb. jars. So far, no illnesses have been reported to date. This voluntary recall was initiated after it was discovered that product containing egg lysozyme was packaged without declaration on the label. The problem was discovered through the company's routine Quality Assurance audit. Consumers who have purchased the recalled product are urged to return them to the place of purchase for a full refund. Consumers with questions should contact the company directly for more information.

Product: Cashew Split
Incident: Possible Health Risk–*Salmonella*

A Maspeth, NY firm announced it is recalling approximately 8,000 lbs. of cashew split because it has the potential to be contaminated with *Salmonella*. The cashew split was distributed between February 18 and March 20, 2015 to retailers and restaurants located in NY, NJ, CT, PA, MA and FL by direct trucking and delivery. The cashew split was sold in 7 oz., 14 oz., 28 oz. and 5 lb. clear plastic pouches. It was also sold in bulk 50 lbs. tins. So far, no illnesses have been reported to date. The recall was the result of routine FDA sampling at a supplier which revealed that the bulk cashew split contained the bacteria. The company has ceased the production and distribution of the product as FDA and the supplier continue their investigation as to what cause the problem. Consumers who have purchased any of these products are urged to dispose of or return them to the place of purchase for a full refund. Consumers with questions should contact the company directly for more information.

United States Department of Agriculture Recalls (www.usda.gov)

Product: Stuffed Chicken Products
Incident: Possible Health Risk–*Salmonella* Enteritidis

A Portland, ME establishment is recalling approximately 1,707,494 pounds of frozen, raw stuffed chicken products that may be contaminated with *Salmonella* Enteritidis. The chicken products were produced between Feb. 17 and May 20, 2015. The original recall on July 2, 2015 also recalled approximately 58,320 lbs. of frozen, raw, stuffed chicken items produce on Jan. 29, Feb. 20 and April 23, 2015. Included in the recall are 2-lb. 4 oz. cardboard boxes containing 6 individually pouched pieces of chicken products and were shipped to retail locations nationwide and Canada. FSIS was notified on June 24, 2015 of a cluster of *Salmonella* Enteritidis illnesses. Based upon epidemiological evidence and traceback investigations, FSIS determined that there is a link between the recalled products and this illness cluster. Six case patients have been identified. Consumers and media with questions about the recall should contact the company.

Product: Steak and Ground Beef Products
Incident: Possible Health Risk–*E. Coli* O157:H7

A Denver, CO establishment is recalling approximately 26,975 pounds of tenderized steak and ground beef products that may be contaminated with *E. coli* O157:H7. The recalled products with generic labeling were produced between June 12 and June 30, 2015. The products were shipped for hotel, restaurant and institutional use in CO, NM, UT and WY. The problem was discovered on June 30 when the firm received a positive result for *E. coli* as part of its in-house sampling program. Some products from the same source material as the positive sample were shipped into commerce. FSIS has received no reports of injury or illness from consumption of these products. Media and consumers with questions in regard to the recall should contact the company.

Consumer Product Safety Commission Recalls (www.cpsc.gov)

Product: Avalanche Airbag Packs
Incident: Possible Risk-Injury Hazard

A Salt Lake City, UT importer is recalling approximately 1,000 units of avalanche airbag packs manufactured in the USA (200 units in Canada). The recall involves a specific model of airbag packs manufactured between October 2, 2014 and March 3, 2015. The motor can malfunction and prevent the airbag from deploying, increasing the risk of injury or death in the event of a snow avalanche. So far, there have not been any incidents or injuries reported to date. The recalled product was sold at specialty outdoor retail stores nationwide and online from December 2014 to June 2015. Consumers should immediately stop using the recalled airbag packs and contact the company for instruction on returning the product fro a free repair. Consumers with questions should contact the company directly or visit their website for more information.

Product: Slingshots
Incident: Possible Risk-Injury Hazard

A Tarpon Springs, FL importer is recalling approximately 88,000 units of sports and hunting slingshots manufactured in Hong Kong (16,000 units in Canada). The recalled slingshot has a black plastic handgrip with red rubber studs on the palm side, a silver metal fork and silver metal folding wrist brace. The folding wrist brace has a wrist strap. It was sold with a gray suede pouch attached. The slingshot's wrist strap can slip off the wrist brace when the slingshot's pouch is pulled back which can result in the body of the slingshot snapping back and striking the user. The firm has received 2 reports of the wrist strap slipping off and the body of the sling striking the users in the face, with some injuries. The product was sold nationwide and online from July 2015-May 2015. Consumers should stop using the recalled slingshots and contact the firm for a free replacement wrist strap. Consumers with questions should contact the company.

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