

Crisis Control Newsletter

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

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Preventive Control for Animal Food

FDA recently announced the preventive control rule for animal food. This is the fifth proposed rule published and is the latest step in implementing the landmark FDA Food Safety Modernization Act (FSMA). The proposed rule would modernize how animal food is manufactured, processed, packed, or held throughout the entire supply chain and minimize potential hazards in animal food.

The Proposed Rule would create a new Part 507 in Title 21 of the Code of Federal Regulations (CFR). The rule has two major features:

- Establishes, for the first time, Good Manufacturing Practices for animal food
- Hazard analysis and risk-based controls are required—Each facility would be required to implement a written food safety plan that focuses on preventing hazards in foods

The proposed animal food GMPs address similar safety requirements as those contained in the proposed rule to update the human food Current Good Manufacturing Practice (CGMP) regulations. These areas include:

- Hygienic personnel practices and training;
- Facility operations, maintenance, and sanitation;
- Equipment and utensil design, use, and maintenance
- Processes and controls; and
- Warehousing and distribution.

While some exemptions and modified requirements are being proposed, the proposed rule would apply to:

- Facilities that manufacture, process, pack or hold animal food
- In general, facilities that are required to register with the FDA
- Domestic and imported food

The preventive controls for human vs. animal food are very similar with some exceptions. Animal preventive controls establish CGMPs (Current Good Manufacturing Practices) while human preventive controls modifies some CGMPs. Also allergens are not considered a hazard for animal food and animal preventive controls do not include nutrient imbalances.

Proposal of CGMPs for Animal food and revisions to existing CGMPs for human food are being reviewed and the FDA is requesting comment on whether it should require rather than recommend certain provisions concerning food contamination. The FDA is also requesting comment on whether CGMPs for human food are appropriate for animal food. In addition, language in the regulation would be updated for consistency in definitions.

Sources: FDA.gov; JD Supra Law News—10/29/13; pet industry news

Exemptions and Modified Requirements

Type of facility or operation	Hazard Analysis & Risk Based Preventive Control Requirements	CGMPs
A facility that has animal food sales averaging <$500,000/ year during the last three years. In addition, sales to qualified end users must exceed sales to others. A qualified end-user is either a consumer (in any location), or a restaurant or retail food establishment purchasing the animal food for sale directly to consumers that is located in the same State or not more than 275 miles away.	Facility must certify that it is a "qualified facility" and that it is implementing and monitoring preventive controls or complying with applicable non-Federal food safety law (which triggers a labeling requirement). Also must maintain records to support certifications.	Must comply
A very small business with total annual sales of animal food, adjusted for inflation is (three options are being proposed:: Option 1: Total annual sales of <$500,000 Option 2: Total annual sales of <$1,000,000 Option 3: Total annual sales of <$2,500,000	Facility must certify that it is a "qualified facility" and that it is implementing and monitoring preventive controls or complying with applicable non-Federal food safety law (which triggers a labeling requirement). Also must maintain records to support certifications.	Must comply
Animal foods subject to the low-acid canned food (LACF) regulation. The exemption for facilities producing LACF applies only to those microbiological hazards addressed by LACF regulation.	Exempt	Must comply
Activities within the definition of "farm," including those that are covered by the proposed rule "Standards for the Growing, Harvesting, Packing and Storing of Produce."	Exempt	Exempt
Certain low-risk manufacturing/ processing activities, packing or holding activities that are conducted by small or very small businesses on farms for specific animal foods. Examples including conveying/weighing/ sorting/culling/grading grain, oilseed, grain and oilseed by-products, and forage (hay and ensiled material).	Exempt	Must comply
Facilities such as grain elevators & warehouses that store only raw agricultural commodities (other than fruits & vegetables, which are covered elsewhere) intended for further distribution or processing	Exempt (provided they are solely engaged in such storage)	Exempt
Facilities, such as warehouses, that only store packaged animal foods that are not exposed to the environment: Packaged animal food for which refrigeration is not required for safety	Exempt	Must comply
Facilities, such as warehouses, that only store packaged animal foods that are not exposed to the environment: Packaged animal food for which refrigeration is required for safety	Requirements concerning temperature controls, including monitoring, verification, and records.	Must comply

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

Product: Bell Peppers
Incident: Possible Health Risk–*Salmonella*

A Irvine, CA firm is voluntarily working with the Food and Drug Administration (FDA) and the California Department of Public Health (CDPH) to coordinate a recall of fresh red and green Bell Peppers for potential contamination with *Salmonella*. The FDA has advised that a random sample of the firm's Bell peppers has tested positive for *Salmonella*. The recall is limited to 3 lots containing 1,208 25-lb. cartons of peppers. The source of the contamination is unknown. The lots were distributed to farmer's markets and wholesale food service within Southern California between Sept. 21 and Sept. 24, 2013. The product is typically sold to retail, food service, and farmer's market level in bulk weight and has no retail packaging associated with it. Consumers who purchased the peppers should contact where they were purchased to inquire whether they have the affected product and should return product to that store for a refund.

Product: Ice Cream
Incident: Possible Health Risk–Foreign Material

A Conestoga, PA firm is recalling specific packages of 1.5 qt. (48 oz./1.42L) and 1 Pint (16 oz./473 ml) packages of their ice cream due to the possibility that some packages may contain metal shavings. The recalled items are limited to packages sold at select markets in Pennsylvania, a select retailer in Pennsylvania and West Virginia, and other small grocers and convenience stores in Maryland and Pennsylvania. All affected stores are directly delivered to and serviced by the firm and have been instructed to remove the product from their shelves. All affected containers would have been purchased by consumers after October 1, 2013. Consumers who have purchased affected packages of the products can return them to the place of purchase for a full refund or contact the company for more details.

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

Product: Rotisserie Chicken Products
Incident: Possible Health Risk–*Salmonella* Heidelberg

A San Francisco, CA retailer is recalling an additional 14,093 units of rotisserie chicken products that may be contaminated with a strain of *Salmonella* Heidelberg. This is in addition to the 9,043 units that were recalled on Oct. 12. The products were sold directly to consumers at a retailer located in South San Francisco, CA between Sept. 11 and Sep. 23, 2013. This recall was initiated due to concerns about a group of *Salmonella* Heidelberg illnesses that may have been associated with the consumption of rotisserie chicken products prepared in and purchased at the store. It appears that the problem may be the result of cross-contamination after the cooking process in the preparation area. FSIS is continuing to work with CDC, public health partners in California and the retailer on the investigation. Consumption of food contaminated with *Salmonella* can cause salmonellosis. Consumers with questions should contact the company directly.

Product: Ready-to-Eat Chicken and Ham Products
Incident: Possible Health Risk–*Listeria monocytogenes*

A Milwaukee, WI. establishment, is recalling approximately 6,694 additional pounds of ready-to-eat chicken and ham products due to possible contamination with *Listeria monocytogenes*. The company is recalling these products in addition to the 19,054 pounds of similar products that were recalled on Sept. 25, 2013. FSIS conducted a food safety assessment at the facility following the initial recall. Microbial testing and other findings as part of the food safety assessment indicated that additional product was contaminated. The products included in the expanded recall were produced between Oct. 10 and Oct. 15, 2013. FSIS and the company have not received reports of illnesses due to consumption of these products. Consumers and media with questions should contact the company directly for more information.

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

Product: Surge Protector
Incident: Possible Risk-Fire Hazard

A West Kingston, RI manufacturer is recalling approximately 15 million surge protectors manufactured in China and the Philippines before 2003. The surge protectors can overheat, smoke and melt, posing a fire hazard to consumers. The recalled products were sold at retailers nationwide from January 1993 through December 2002. The firm has received 700 reports of the surge protectors overheating and melting and 55 claims of property damage from smoke and fire, including $916,000 in fire damage to a home and $750,000 in fire damage to a medical facility. There are 13 reports of injuries, including smoke inhalation and contact burns from touching the overheated surge protectors. Consumers should immediately stop using the recalled surge protectors, unplug them and contact the company for a free replacement surge protector.

Product: Circular Saw (September 2013)
Incident: Possible Risk-Laceration Hazard

A Lebanon, IN importer is recalling approximately 5,200 (500 units in Canada) plunge cut circular saws. The saws were manufactured in Germany and sold at hardware stores, woodworking stores, other independent retailers and online from May 2013 to July 2013. The recalled saw is a small, portable circular saw for woodcutting with a 160 mm saw blade, aluminum guide rails and a plunge cut feature. It is 12 inches long and has a gray blade housing and a midnight blue motor housing with a soft hand grip and green accents. The plunge lock can engage when not intended, causing the saw blade to remain exposed from the housing following completion of the plunge cut and posing a laceration hazard. The firm has received no reports of injuries and one report of property damage. Consumers should immediately stop using the recalled saws and contact the company to get a free repair, replacement or refund.

Crisis Control is a newsletter jointly published by RQA, Inc. & Catlin Group.

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