Minimize Risks When Handling Food Products

User Guide to Food Safety Acronyms:

- **CCP:** Critical Control Points

- **CGMP:** Current Good Manufacturing Policies

- **FDA:** U.S. Food and Drug Administration

- **FSIS:** Food Safety Inspection Services

- **FSMA:** Food Safety Modernization Act

- **FSVP:** Foreign Verification Program

- **FSP:** Food Safety Plan

- **HACCP:** Hazard Analysis Critical Control Points

- **HARPC:** Hazard Analysis and Risk-Based Preventative Controls

- **USDA:** United States Department of Agriculture

A food safety plan (FSP) is critical to identifying and controlling hazards such as microorganisms, chemicals (i.e., allergens), and physical hazards within food products. Key components of food safety plans are required by federal and state regulatory bodies, and also serve as vital risk management practices to reduce or prevent the likelihood of foodborne illness — illness caused by consuming contaminated food or drink.

Current Good Manufacturing Practices (CGMPs) are established by the U.S. Food and Drug Administration (FDA) and establish the **minimum** sanitary processing requirements for producing safe food and are specific to the types of products and types of processes for any food handling establishment within the US.

Among these CGMPs are required hazard evaluation processes, depending on the operations of a food handling establishment. Most notable among these standards are the requirements for Hazard Analysis Critical Control Points (HACCP) and the most recent addition of Hazard Analysis and Risk Based Preventative Controls (HARPC).

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What is HACCP? Hazard Analysis and Critical Control Points

HACCP is a seven-principle system for identifying hazards in raw materials production processes which may result in an unsafe end product. The purpose is to identify process controls called **Critical Control Points (CCPs)** to reduce the hazard below a defined minimum or maximum level called the critical limit.

- Examples of critical control points may include temperature monitoring for a cooking process, metal/x-ray detection, acidification and many others.

HACCP Principles

1. Conduct a hazard analysis

2. Determine appropriate critical control points to control a hazard

3. Establish critical limits to reduce or prevent a hazard

4. Establish monitoring procedures to observe CCPs

5. Establish corrective actions for noncompliance with critical limits

6. Establish verification procedures, such as sampling and testing to verify if things are within the critical limits.

7. Establish record keeping procedures

HACCP is required by federal law, state law (which may vary by state), and in some cases by local codes for operations having specific processes. HACCP may also be required by a business's customers. **However, even though not required for some processes or food handling business, HACCP should be a part of a food handling and manufacturing operation's food safety plan to help address food adulteration hazards.**

A HACCP plan is **not** equivalent to a complete food safety plan. Other elements are needed to adequately address potential food handling hazards.

Businesses Required to Have a HACCP Plan by Federal Regulatory Standards

- Seafood processors (including warehousing), importers, wholesalers, and distributors (21 CFR 123.6)

  NOTABLE EXEMPTIONS:

  - Retail businesses such as restaurants, supermarkets, or hospitals selling product directly to consumers and do not sell or distribute to other businesses or engage in interstate commerce of seafood products are exempt from HACCP requirements by the FDA. **Not all retail businesses under this definition are exempt if they have processes such as using fermentation as a method of preservation of retail goods, using low-oxygen packaging (such as vacuum sealing), and/or sous vide preparation.**

  - Harvesters of seafood or shellfish if they do not process the product. Processing does not include common activities such as 'heading', freezing, or eviscerations performed onboard the fishing vessel.

■ Common carriers who may haul seafood product, unless they are also the owner of the goods upon importation.

■ Meat, poultry, and egg products processors, importers, wholesalers, and distributors (9 CFR 417. Enforced by the Food Safety Inspection Services [FSIS] as a part of United States Department of Agriculture [USDA] requirements)

■ Juice processors, importers, wholesalers, and distributors (21 CFR 120.8)

NOTABLE EXEMPTIONS:

■ Retail businesses selling juice directly to consumers and do not sell or distribute to other businesses are exempt from juice HACCP regulations.

■ Milk handlers such as haulers, bottling plants, pasteurizers, or processors are not mandated to utilize HACCP as it is voluntary under the '2017 Pasteurized Milk Ordinance' (FDA)

HARPC - Hazard Analysis and Risk-Based Preventative Controls:

As part of the Food Safety Modernization Act (FSMA), any business required to be registered by the FDA, must have a HARPC plan as part of the development of their food safety plan. This includes food processors, manufacturers, packers, importers, storage facilities, applying to every establishment that may handle food products.

HACCP AND HARPC DIFFERENCES AND SIMILARITIES:

HACCP does not meet all of the standards of HARPC. While the end-goal is similar, HARPC is required even for an establishment with existing HACCP plans. HARPC focuses on preventative controls rather than critical control points to control biological, chemical, physical, and radiological hazards. While HARPC PCs are functionally the same as HACCP CCPs for process controls, it also considers three additional categories of preventative controls: Supply chain controls (such as verification of a domestic/foreign suppliers food safety controls), sanitation controls (such as employee hygiene, pest control, cleaning practices in product or ingredient receiving or storage areas, etc.) and allergen controls (cross contamination prevention in storage and processing, labeling controls for product identifying allergens, etc.).

Both the HACCP and HARPC plans are supported by 'prerequisite programs', required by FSMA. These include:

■ A foreign verification program (FSVP) to verify products meet U.S. food safety standards for imported goods

■ A sanitary transportation program to identify and control hazards for food products in transit

■ A food defense plan to address foreseeable hazards from the intentional adulteration of food

Potential Repercussions For Not Implementing a Food Safety Plan and Controls:

- Long term injury or death of the consumers of adulterated/ contaminated food

- Costly product recalls from widely distributed products (such as ingredients sold to other food processors, nationally and internationally distributed food)

- Criminal charges

- Importation bans from foreign suppliers.

- Suspension of FDA registration, which would prevent the processor/distributor/handler from distributing or selling product in the U.S. until registration is otherwise reinstated by the FDA.

- Those under the jurisdiction of USDA, such as meat, poultry, or egg products, would be prevented from distributing or selling product in the U.S.

Resources:

The FDA has much more information and resources on food safety that you can put to use right away.

Providing solutions to help our members manage risk.®

For your risk management and safety needs, contact Nationwide Loss Control Services: 1-866-808-2101 or LCS@nationwide.com.