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Reducing the Insider Threat

By Marianne Elbertson

In the December 2007 issue of *Small Plant News*, you learned about the importance of a food defense plan. In this article, you will get an overview of reducing the threats to your business from inside. As you develop your food defense plan, one aspect to consider is threats to your business. This includes the insider threat, the real risks of insiders gaining access to product and facilities and collecting information.

An insider is someone with access to inside knowledge of your company. This allows insiders to take advantage of the weaknesses at your facility with the intent to cause harm. Insiders may include current or former employees who may hold a grudge against the company, truckers making deliveries and contractors providing cleaning and maintenance services.

One way to decrease potential insider threats is for plant owners, managers, and employees to increase their awareness of a couple of factors. These could be potential actions and behaviors that could indicate someone may be collecting information for criminal purposes.

Examples include:

- Someone expressing unusual interest in your production processes;
- An employee or visitor in an unauthorized area;
- Someone having unauthorized access to company information like blueprints and flow diagrams;
- Someone doing unusual photographing or observing the facility;



- An individual making verbal, written or physical threats;
- Someone displaying patterns of irregular behavior; and
- An employee has unexplained changes in work schedules or attempts to be alone in the facility.

If an employee or other person exhibits any of these behaviors, it could indicate a potential threat to your customers, employees and business. Contact your local law enforcement officials to report any suspicious activity.

When it comes to food defense, it's about protecting your customers, your employees and your business. For additional food defense information, talk to your FSIS inspector, call the Office of Food Defense and Emergency Response at (202) 720-5643 or visit FSIS' Web site at www.fsis.usda.gov.

New Course on Meat and Poultry Processing at Retail Available to Small Plant Owners

By Ralph Stafko

F SIS is pleased to announce that the Association of Food and Drug Officials (AFDO), under a cooperative agreement with FSIS, has developed and is now offering to the public an online course of instruction on meat and poultry processing at retail.

The course is given in 13 modules covering, among other things, the application of Hazard Analysis and Critical Control Points (HACCP) principles and the application of processing controls for specific kinds of products, including ground beef, smoked and cured product, fresh and fermented sausages and dried products like jerky.

The course, including quizzes, is available to the public free of charge. After completing the course, the user may obtain a certificate of comple-



The 13-module course is available free at www.afdo.org to anyone who wishes to take the online instructions on meat and poultry processing at retail. (USDA Photo by Ken Hammond)

tion, for a small fee, from AFDO and earn continuing education units toward Environmental Health and Food Safety Professional credentials offered by the National Environmental Health Association.

Although the course is directed primarily to State and local inspectors who work with retail stores,

restaurants and other inspection-exempt processors of meat and poultry products, the course should be of interest to operators of small and very small plants producing similar products.

“We are truly excited about this course,” said AFDO’s Leigh Ann Stambaugh. “This instruction fills a major gap in the training available to State and local food inspectors, and AFDO is proud to also make the training available to the public.”

FSIS strongly supports this AFDO effort which will equip State and local inspectors and others to protect consumers and support the agency’s food safety goals.

AFDO makes available to the public free, or at nominal cost, a variety of other food safety-related resource materials developed for State and local agencies. For more information, go to AFDO’s Web site at www.afdo.org or call (717) 757-2888.

Food Safety Resources

By Mary Gioglio

Want to learn more about developing Hazard Analysis and Critical Control Point (HACCP) plans? You can by requesting a copy of *Your Self-Study Guide to Understanding How to Develop a HACCP Plan*. This set of materials includes a workbook and two videos.

The workbook covers an introduction to HACCP, preliminary steps for developing HACCP plans and the seven principles of HACCP. It also contains a set of review questions and sample forms that can be used when developing a plan. The *HACCPWORKS* video complements the workbook. A second video, *HACCP: Hazard Analysis and Critical Control Point* system, is also provided and contains the seven principles of HACCP.

This is a great resource to review when developing your facility’s HACCP plan(s) in an effort to meet necessary Federal requirements.

To request this, or any resource item, fax the order form found on FSIS’ *Food Safety Resource Brochure* to (202) 690-6519, or complete an online version of the form and send it to FoodSafetyResources@fsis.usda.gov. The online form can be found at www.fsis.usda.gov/Science/HACCP_Resources_Order_Form/index.asp.



Federal Food Labeling Guide

New Manual Provides Insight on Requirements and Policies

By Rosalyn Murphy-Jenkins

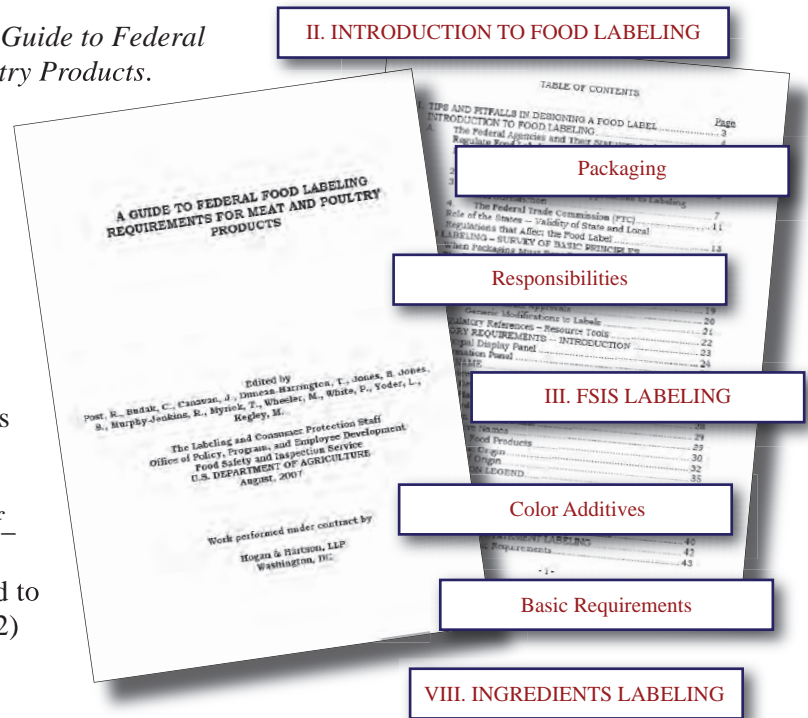
F SIS has posted on its Web site a manual titled *A Guide to Federal Food Labeling Requirements for Meat and Poultry Products*.

This guide is a comprehensive, user-friendly document on the basics of food labeling requirements for meat and poultry products. It is designed to be an easy-to-follow guide to assist plants, consumers and FSIS personnel on regulatory requirements and policies for labeling products.

While not a substitute for an in-depth understanding of legal and regulatory labeling requirements, the guide provides the reader with useful tools to identify and understand the requirements that shape food labels that manufacturers design for consumers.

The manual is available on FSIS' Web site at www.fsis.usda.gov/regulations_&_policies/Basics_of_Labeling/index.asp.

Questions regarding the manual should be directed to FSIS' Labeling and Program Delivery Division at (202) 205-0623 or use FSIS' Web-based feature *askFSIS* at <http://askfsis.custhelp.com>.



Briefs

By Sheila Johnson

Imports

The recent dangers found in some imported apparel, pet food ingredients, toys, seafood and other products prompted a call for review of import safety. On July 18, 2007, President Bush issued an Executive order establishing an Interagency Working Group on Import Safety. The Working Group, comprised of 12 Federal departments and agencies, which includes the U.S. Department of Agriculture, was charged with assessing current procedures aimed at ensuring the safety of products exported to the United States, identifying potential means to

promote steps used to enhance import safety, and surveying government agencies to identify best practices and enhance coordination. The Working Group's framework of prevention (prevent harm in the first place), intervention (intervene when risks are identified) and response (respond rapidly after harm has occurred), coupled with its *Action Plan for Import Safety: A roadmap for continual improvement* will ensure the public and private sectors will work to continue to meet the expectations of the American consumer. To obtain a copy of this action plan, visit the Working Group's Web site at www.importsafety.gov.

Public Meetings

A public meeting of the National Advisory Committee on Meat and Poultry Inspection (NACMPI) will be held in February. FSIS plans to have dialogue with NACMPI to address the Agency's planned public health-based slaughter inspection system for young chickens, and how a similar approach could be used for inspection in processing and other slaughter establishments. To obtain more information about this meeting and other public meetings, visit FSIS' Web site at www.fsis.usda.gov or call (202) 690-6520.

askFSIS at <http://askfsis.custhelp.com>

This Web-based feature is designed to help plant owners and operators

get answers to technical and policy questions 24 hours a day.

What's in a Generically Approved Label?

By Mary Gioglio

In 1996, FSIS streamlined the prior label approval process which allows more flexibility for the use of generically approved labeling. A generically approved label is a label (or labeling change) that can be applied to a product if certain requirements are met. FSIS does not need to evaluate a generically approved label. It's important to note that if a label qualifies as a generically approved label and an establishment submits the label to FSIS for approval, the label will be returned to the establishment as an unapproved label.

To avoid that situation and unnecessary mailing costs, it's important to know what qualifies as a generically approved label. Listed below is a brief breakdown of some products and labels that fall into the generically approved label category.

- Single ingredient products that bear no claims;
- Products sold under contract specifications to the Federal Government;
- Labeling of shipping containers that contain fully and properly labeled intermediate (inner) containers;
- Food not intended for human consumption;

- Meat inspection legends;
- Inserts, tags, and other materials that bear no reference to the product and are not misleading; and
- Labeling for consumer test products not intended for sale.

FSIS also specifies changes that can be made generically to a sketch-approved label in its regulations (Title 9 of the Code of Federal Regulations [CFR], Section 317.5 for meat and 381.133 for poultry).

For a complete description of all the generic labeling requirements, call FSIS' Labeling and Program Delivery Division at (202) 205-0623 or visit www.fsis.usda.gov/Regulations_&_Policies/Generic_Labeling/index.asp.

Commonly Asked Questions & Answers

Q. Can "deflavored" or "decharacterized" mustard (or other spices) be used as an ingredient in meat or poultry products? If so, how should it be designated in the ingredient statement?

A. Deflavored (or decharacterized) mustard is an acceptable ingredient in the preparation of meat or poultry products, under the conditions of use that are acceptable for spices or flavorings, including level of use. When used in a meat or poultry product, deflavored mustard may be designated as "deflavored mustard," "deheated mustard," or "deactivated mustard." According to the U.S. Food and Drug Administration, deflavored mustard, however, may not be designated as "mustard," "spice," or "flavoring." The same would hold true for other spices.

Q. If a monitoring procedure consists of taking multiple measurements, are separate entries required for each measurement (i.e. must each measurement include a time, date and initials)?

A. If the establishment's HACCP plan lists the monitoring procedure (9 CFR 417.2(c)(4)) and that monitoring procedure consists of multiple measurements to ensure compliance with the critical limit, the entry made on the HACCP record should include each of the measurements made during the monitoring procedure. Only one time and one initial or signature would be required per 9 CFR 417.5(b) for the monitoring event. The establishment is responsible for ensuring the accuracy of all measurements, regardless of the number taken.