

## HACCP Utilization and Food Safety Systems PDG

**Attendees:** Pamela Abney, Adebayo Afuape, Deann Akins-Lewenthal, Mohammed Alhejaili, Ashley Arnold, Fatemeh Ataei, John Bassett, David Bauer, Dan Belina, Lenore Bennett, Georg Berns, Tom Black, Audrey Boeken, Neil Bogart, Michelle Bogda, Ann Bontempo, Tom Bruursema, Martin Bucknavage, Dennis Burson, Jose Calzada, Loan Cao, Stoyka Chipchakova, Ma. Rocelle Clavero, Angel Conde, Frederick Cook, Jose Emilio Esteban, Martin Guy Ethy, Kimberly Fisher, Mirijam Garske, Tiah Ghostlaw, Chao Gong, Karen Gregory-Williams, Stephen Grove, Allen Haas, Mohammed Hakeem, Dong Han, Eddy Higa, Ziyi Hu, Margaret Jacks, Tim Jackson, Amanda Jones, Amit Kheradia, Amanda Kinchla, Sally Klinect, Jaheon Koo, Richard Kralj, Brian Kraus, Lorilyn Ledenbach, Yanbin Li, Martha Limo, Maria Lovelace-Johnson, Lisa Lucore, Simone Machado, Bob Martin, Lynn McMullen, Mohammad Melebari, Karen Mertins, Ron Millar, Gabriel Mootian, Tetsuya Mori, Chad Nelson, Katia Noll, Wendy Ortman, Mangesh Palekar, Elizabeth Palmer, Vera Peterson, Phyllis Posy, Damanna Rao, Luis Rodriguez, Donna Schaffner, Anthony Shaw, William Shaw, Jr., Dorra Simmons, Katherine Swanson, Yoko Takahashi, Peter Taormina, Januana Teixeira, Hung King Tiong, Tomohiko Tsurumaru, Brian Walker, Jason Wan, Benjamin Warren, Brad Webster, Pamela Wilger, Johnny Yu, Edith Zambrana, Veronica Zavala, and Peipei Zhang.

**Number of Attendees:** 88.

**Meeting Called to Order:** 1:00 p.m., July 9, 2017.

**Minutes Recording Secretary:** Benjamin Warren.

**Old Business:** Antitrust policy was reviewed with the PDG members. Reviewed the 2017 symposia that could be of interest to the PDG. Members were reminded that they can manage their own PDG memberships online in their IAFFP Member Profiles. Non-IAFFP members can join the PDG by sending an email to Lori Ledenbach at lharris@kraftheinzcompany.com.

### New Business:

1. Ben Warren passed the position of PDG Chair to Lori Ledenbach, and so the PDG needed to elect a new Vice Chair.
2. An election was held for a new Vice Chair. Deann Akins-Lewenthal was voted in as incoming Vice Chair.
3. Jenny Scott gave a brief presentation on the Codex revisions to GHP.
  - a. Five co-chairs: UK (lead), USA, Ghana, India and Mexico
  - b. To provide clarification in areas where the original document was not clear or did not provide sufficient guidance.
    - i. Verification and validation
    - ii. Corrective actions
    - iii. How to do an HA
    - iv. Can HACCP apply to all sectors from primary production thru manufacturing, catering, or retail?
    - v. Agreement on 7 principles (no 8th principle)
    - vi. Recognition that CCPs alone are not enough for achieving food safety
      1. Controls measures that are not appropriate for a CCP but essential for food safety – enhanced GHPs

- vii. Some discussion on where an HA should be?
  1. If HA is moved closer to the front (Apply HACCP before or at the same time as development of GHPs)
  2. If HA is further back (build GHPs than apply HACCP Principles)
- c. The HACCP section is the least developed at this time.
  - i. Developing countries have concerns on how well the terminology in the HACCP section will be understood.
- d. Revised document will be circulated for member country review and comment
- e. Physical working group meeting at next meeting in November in Chicago
4. Breakout discussion sessions
  - a. Risk evaluation supply chain hazard analysis, FSVP
    - i. How supply chain hazards fall under the ingredient and supplier
      1. You own the responsibility for making sure the hazards are controlled
      2. Symposia idea – speakers from various parts of the supply chain and address the categories along the supply chain
    - ii. Foreign or domestic – the focus is on mitigating the risk
    - iii. FSVP training through FSPCA
      1. Training on supply chain management immediately following the IAFFP meeting
  - b. Relating “enhanced GHP” to OPRPs and PRPs
    1. Improving communication for CODEX Principles in HACCP and principles in FSMA don’t exactly match up
      - a. This has been done and was a reference in the final rule
      2. Enhanced GHPs – example cleaning/sanitizing of a meat slicer for *Listeria* control. Not a CCP but more essential than a GHP. Everyone not on the same page...it remains controversial.
        - b. Is the Enhanced GHP concept suitable for all types of operations?
          - i. One of benefits from CODEX might be to define equivalencies to OPRP or other terminology
    - c. Ingredient Risk Assessment – characterizing risk of ingredients in light of FDA Draft Guidance
      - i. Education – does the person conducting risk assessment do they have enough education to know what resources to look at the characterize risk properly
        1. Do we have enough training in the industry to determine this?
    - d. Qualitative vs quantitative approaches to characterize severity and likelihood of potential hazards
      - i. Both approaches may be valid
      - ii. If not data then bound to a qualitative approach

- iii. Differences if from a HACCP POV vs. RA POV
    - 1. Likely to be there vs likely to be there and will cause illness/injury
      - a. Dose-response
  - iv. Severity – ICMSF qualitative approach for micro hazards
    - 1. Categories must be developed for other types of hazards
  - v. Either approach is used to reduce complexity and decide what may be acceptable or not acceptable
  - vi. Matrices between likelihood and severity are commonly used
  - vii. No easy answer....it depends, its complicated
5. IAFP HACCP Guidance document – Ewen Todd referred to an IAFP HACCP guidance document that has been in place for several years, and the question was raised as to whether the document needs to be updated, and if so, can the HACCP PDG take care of that? Discussion in the group came up with:
- a. Can the Board tell us how many times it is accessed? We will ask the Board to let us know how often the document is accessed to determine if we need to keep the document. If it is not accessed too often, we may recommend removing it, since there are many other tools and guidance documents already readily available now.
  - b. If we determine that the document needs updating, this PDG will take the lead in reviewing it and determining whether it is needed and if so, does it need modification
6. Brainstorming of Symposia ideas:
- a. Supplier verification activities – what is really needed? As it relates to audits, scientific basis of preventive controls, choosing the appropriate validation of process controls (i.e., using the right surrogate). Speakers from various parts of the supply chain and address the categories along the supply chain – Rocelle Clavero and Johnny Yu.
  - b. How to handle HACCP/Food safety plans in dual or multi-jurisdiction manufacturing facilities (such as USDA/FDA, or FDA PCHF/Seafood HACCP, or FDA PCHF/Juice HACCP) – CCPs and PPs vs. PCs in one plant? – Sally Kinnet and Lori Ledenbach.
  - c. Using COA testing as a verification activity for supply chain controls – how to determine appropriate methods and sampling schemes (this can be done jointly with the Applied Methods PDG) – Rocelle Clavero and Amanda Kinchla. May also be a good article for FPT – Neil Bogart and John Bassett will work on that idea.
  - d. Application of FMEA tools and principles in verification of food safety plans – Liz Palmer and Bala Kottapali (from the Microbial Modelling and Risk Analysis PDG).

**Recommendations to the Executive Board:**

- 1. Recommend that Deann Akins-Lewenthal be approved as Vice Chair of the PDG.
- 2. Request that the Board determine how many hits have been made in the last 2 years on the IAFP HACCP Guidance document and inform the PDG Chair of the results.

**Next Meeting Date:** July 8, 2018, Salt Lake City, UT.  
Conference call – mid to late August.

**Meeting Adjourned:** 2:50 p.m.

**Chairperson:** Loralyn Ledenbach.