



# OFFICE OF ADVOCACY *FACTSHEET*

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## ***Advocacy Suggests that the Food and Safety Inspection Service Take Small Meat and Poultry Processors' Concerns into Account when Designing HACCP Systems Validation***

On May 10, 2010, the Office of Advocacy (Advocacy) filed comments with the Food and Safety Inspection Services (FSIS) providing the agency with various meat and poultry processors' concerns with the guidance document issued to industry on Hazard Analysis and Critical Control Point (HAACP) system validation. A copy of Advocacy's letter may be accessed at <http://www.sba.gov/advo/laws/comments>.

- On July 25, 1996, FSIS published the Pathogen Reduction: HACCP Systems Final Rule (61 FR 38806) Docket No. 93-016F in the *Federal Register*. This document presented the validation requirements for meat and poultry establishments. The regulation stated that each establishment is required to validate the effectiveness of its HAACP plans in controlling those food safety hazards identified during the hazard analysis. The regulation also stated that establishments are to conduct these validation activities during the establishment's initial experience with a new HACCP plan and encompasses additional activities that make up the entire HACCP system. In addition to the regulatory language, the final rule also defined what constituted validation.

- On March 19, 2010, FSIS Administrator Alfred Almanza wrote a letter and attached agency guidance addressed to various meat and poultry representatives in response to a September 22, 2009, letter written by the representatives outlining their understanding of the HACCP systems validation requirements of the 1996 rule.

- While Advocacy's suggestions were rather technical in nature, the comments were designed to encourage FSIS to take the affected meat and poultry processors' concerns into consideration as it continued to clarify and develop the requirements of HAACP system validation. Also, Advocacy asked FSIS to entertain pursuing changing the requirements of the 1996 regulation through a new rulemaking that analyzed the impacts of the HACCP system validation procedures on the affected industries.

For more information, visit Advocacy's web page at [www.sba.gov/advo](http://www.sba.gov/advo) or contact Linwood Rayford at (202) 205-6533.