

TECHNICAL BULLETIN

1015

USDA/FSIS The Past and Future of Food Safety

On February 13, 1998, the FOOD SAFETY INSPECTION SERVICE (FSIS - a department of the USDA) announced its elimination of the previously held policy regarding prior approval of "nonfood compounds" and "proprietary substances".

THE HISTORY OF FSIS POLICY

This policy required that, prior to their use in establishments that were under the auspices of the USDA Poultry, Meat, & Egg Products Inspection Program, the "nonfood compounds" and "proprietary substances" had to be authorized for use by FSIS. As defined by FSIS, a "nonfood compound" is a cleaning compound, a laundry compound, paint removers, hand washing compounds, sanitizers, pesticides (insecticides), boiler and water treatments, lubricants, solvents and sewer/drain cleaners. "Proprietary substances" include marking agents (i.e.: branding and tattoo inks), denaturants and other food processing substances.

This policy was undertaken originally for two purposes:

- 1) To provide assurance to Meat, Poultry, & Egg producers that the use of the authorized nonfood compounds and proprietary substances would not result in adulteration or contamination of food products (providing they are used properly) and;
- 2) To ensure that certain compounds, such as sanitizers, meet minimum standards of effectiveness when used as directed.

The policy was carried out by a procedure where chemical manufacturers would apply to FSIS for authorization (NOT "approval"), including formula information and other requested data in their application. Upon examining the application and granting the authorization, FSIS would send a letter to the manufacturer indicating the authorization of the product (see enclosed example).

It is important to note several things that are contained in the authorization letters:

- 1) The second paragraph outlines the intended use for the authorized product. Note that this use matches the "USDA Product Codes" as shown on the enclosed chart.
- 2) The third paragraph points out that use of the compound should not be undertaken with food Products or packaging present. It also emphasizes the importance of rinsing surfaces with potable (drinking) water, after use

of the product.

- 3) The fourth paragraph clearly states that FSIS does NOT endorse products or claims made by products. This is stated to ensure that producers of food products are aware that marketing claims of chemical manufacturers and distributors do NOT have FSIS endorsement and (implicitly) should be verified by the producer.

After issuing the manufacturer the Authorization Letter, the authorization was published in the next edition of the List of Nonfood Compounds and Proprietary Substances. This List (actually a sizeable book) was used by FSIS Inspectors to verify approval of products prior to their use in Official Establishments.

Over the time that the FSIS Authorization program was in effect, many users of chemical cleaners and sanitizers came to see FSIS authorization as an endorsement, particularly those in establishments that were NOT subject to the FSIS Inspection Program. These establishments include:

Supermarkets (both back and front of the house)

Restaurants

Commercial Kitchens (commissaries, contract feeders, etc.)

Institutional Food Service Operations (schools, hospitals, etc.)

These establishments have never been and are not currently under the auspices of the FSIS Inspection Programs. Therefore, use of USDA Authorized products has never been a requirement for these establishments. There is good sense in these establishments benefiting from the assurances built in to the FSIS Program, but careful attention to the proper selection and use of cleaning and sanitizing products should never be overridden by blind acceptance of ANY product's USDA Authorization. The best method of providing food safety assurance is to ensure that your establishment has an appropriate process control system.

THE FUTURE OF FSIS POLICY

FSIS has set forth a new food safety strategy in FSIS Docket No. 93-016F "Pathogen Reduction; Hazard Analysis and Critical Control Point (HACCP) Systems". This is commonly known as HACCP (pronounced HAS-sip).

This strategy requires that every official Meat and Poultry establishment will develop and implement HACCP, which is a science based process control system specifically designed to improve the safety of meat and poultry products. Establishments will be responsible for incorporating HACCP controls necessary and appropriate to produce safe products and therefore the establishments, not FSIS, will be responsible for determining whether the nonfood compounds and proprietary substances are safe and effective.

By ending the prior approval program and discontinuing publication of the List of Authorized Nonfood Compounds and Proprietary Substances, FSIS will be able to redirect resources to better implement inspections required by the HACCP regulations. FSIS will maintain a small staff with expertise in Nonfood Compounds and Proprietary Substances. That staff will keep abreast of developments in the field and issue technical guidance, particularly to smaller meat and poultry producer plants, as circumstances dictate. The staff will also maintain liaison with outside organizations with interests in

the area of food safety.

FSIS will, of course, continue to require that meat and poultry products be neither adulterated nor misbranded through the misuse of nonfood compounds and proprietary substances. Enforcement activities in this regard will include (but are not limited to):

- Establishment premises inspection
- Establishment products inspection
- Sampling (for chemical residues) as necessary
- Review of Establishment records including
 - Sanitation Standard Operating Procedures
 - HACCP plans
 - Use directions and other materials provided by chemical suppliers
 - Pest control certifications
- Requests for formula information from chemical manufacturers.

As under the former FSIS program, the HACCP requirements apply to Official Meat and Poultry Establishments. This does not include the types of establishments named above i.e. Supermarkets, Restaurants, Institutional Food Service, etc. THEREFORE, if you are not an Official Establishment, you are not required to operate under the HACCP regulations.

This, of course, does not mean that many very beneficial aspects of HACCP should be disregarded. As an example, the HACCP-type use of Sanitation Standard Operating Procedures can be an excellent way to improve food safety. Another HACCP-type procedure, which can improve the food safety in your operation, is the scheduled and documented verification of proper temperatures for different aspects of your operation. Other procedures, records and controls can be implemented with the assistance of your representative.

The future of FSIS is indeed different from its past. We hope that this Technical Bulletin has presented the current course of FSIS clearly. For further information on this or related subjects, please contact your Sales Representative or call Customer Technical Service at 800.325.9218 ext. 580.