LOUISIANA Fisheries Forward QUALITY + EDUCATION + SUSTAINABILITY

USDA/FSIS CATFISH COMPLIANCE WORKSHOP

TOPICS INCLUDE:

- Filing for Grant of Inspection
- USDA label approval
- Sanitation Performance Standards
- Sanitation Standard Operating Procedures (SSOPs)
- Conducting a Hazard Analysis and developing of a HACCP plan
- Developing a recall plan

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USDA

LOUISIANA FISHERIES FORWARD
Advancing Our Seafood Industry

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TABLE OF CONTENT

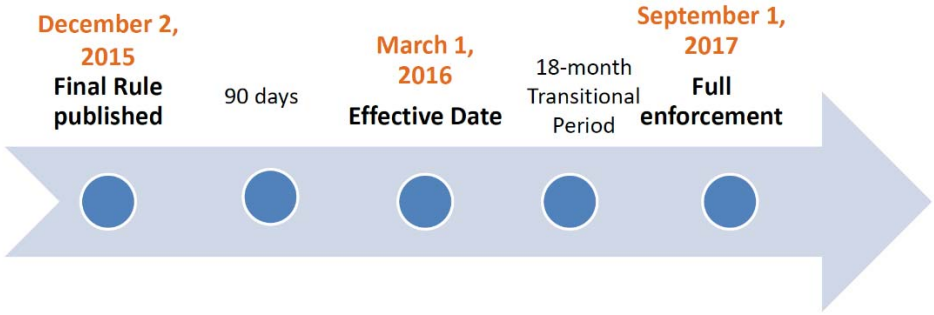
--ATTENTION--

Examples and models in this curriculum are only a guide. Keep in mind that these models do not apply to all situations.

USDA/FSIS Siluriformes fish and fish products inspection

For domestic catfish processing facilities

Siluriformes is an order of bony fish that includes all catfish; there are nearly 2,900 species of catfish. On March 1, 2016, Siluriformes fish inspection was officially transferred to the Food Safety and Inspection Service (FSIS)— the public health agency in the U.S. Department of Agriculture (USDA) responsible for ensuring that meat, poultry, and processed egg products are safe, wholesome, and accurately labeled.



(Figure source: https://www.fsis.usda.gov/wps/portal/fsis/topics/inspection/siluriformes)

This transition to the USDA means that any person or business that engages in commerce of Siluriformes fish and its products, processing, packaging, storing, transporting, or distributing, must register their business and apply for a **Grant of Inspection (GOI).** Businesses that receive a Federal GOI are known as 'official establishments', and are assigned an establishment number.

Task 1. File an application for Federal inspection services. Any person, firm, or corporation that engages in commerce as a Siluriformes fish or fish products broker, renderer, animal food manufacturer, wholesaler, or public warehouseman must register their business as required by the regulation. In this list

includes farmers and transporters that supply Siluriformes fish to official establishments. FSIS Form 5020-1, Registration of Meat and Poultry Handlers must be completed and submitted to FSIS. The form can be downloaded from the FSIS Web site at: https://www.fsis.usda.gov/wps/wcm/connect/245282ee-4cd5-4247-8fe0-04f8b7e94db5/Form-5020-1.pdf?MOD=AJPERES

Task 2. Ensure facilities meet regulatory sanitation performance standards (SPS). Each official establishment must be operated and maintained in a manner sufficient to prevent the creation of insanitary conditions and to ensure that product is not adulterated. There are SPS requirements for:

- Grounds and pest control
- Construction
- Light
- Ventilation
- Plumbing
- Sewage disposal
- Water supply (including ice)
- Dressing rooms, lavatories and toilets
- Equipment and utensils
- Sanitary operations
- Employee hygiene
    - Cleanliness
    - Clothing
- Disease Control

Task 3. Obtain approval for each label requiring sketch approval by the Office of Policy and Program Development (OPPD) Labeling and Program Delivery Staff (LPDS). Form 7234-1. FSIS must approve all labels used on products produced by official establishments. FSIS approves labels either through the sketch approval process or through generic label approval. More detailed information is available at https://www.fsis.usda.gov/wps/wcm/connect/bf170761-33e3-4a2d-8f86-940c2698e2c5/Label-Approval-Guide.pdf?MOD=AJPERES

All labels must bear these mandatory features:

- Product name;
- Inspection legend and establishment number;
- Handling statement (if required);
- Net weight statement (if required);
- Ingredients statement (if composed of two or more ingredients);
- Name and address of the manufacturer, packer or distributor;
- Nutrition facts (unless exemption applies); and
- Safe handling instructions (if required).

Task 4. Obtain a water report attesting the potability of the water supply. If an establishment uses a municipal water supply, it must make available to FSIS, upon request, a water report, issued under the authority of the State or local health agency, certifying or attesting to the potability of the water supply. If an establishment uses a private well for its water supply, it must make available to FSIS, upon request, documentation certifying the potability of the water supply that has been renewed at least semi-annually.

Task 5. Obtain approval from the State or local hearth authority if sewage disposal system is a private system. Sewage must be disposed into a sewage system separate from all other drainage lines or disposed of through other means sufficient to prevent backup of sewage into areas where product is processed, handled, or stored. When the sewage disposal system is a private system requiring approval by a State or local health authority, the establishment must furnish FSIS with the letter of approval from that authority upon request.

Task 6. Provide written Sanitation Standard Operating Procedures (SSOPs). Each establishment must develop, implement, and maintain written SSOPs for the procedures it conducts daily, before and during

operations, to prevent product from direct contamination and adulteration. SSOPs must be signed and dated by someone that has overall onsite authority at the establishment, or a higher level establishment official. Implementation of the SSOPs involves conducting all of the pre-operational procedures before operations begin, as well as conducting all other procedures at the frequencies specified. Implementation must be monitored daily.

Example: Sanitation Standard Operating Procedures

EXAMPLE OF A BASIC WRITTEN SSOP

NAME OF PROCESSING FACILITY
SANITATION STANDARD OPERATING PROCEDURES

Owner: _____

Pre-operational
All food contact surfaces of the facility, equipment, and utensils in processing rooms will be cleaned daily after production by rinsing, soaping, and sanitizing. All cleaning will be monitored daily by plant manager or designee before production begins each day. Records will be kept on the SSOP checklist.

Operational
Every day, all equipment and surfaces in the processing room will be kept as sanitary as necessary to prevent contamination or adulteration of the carcasses/product.

Every day, all employees will follow hyienic practices to keep themselves from contaminating or adulterating the product. These actions will be monitored by plant manager or designee once per day and recorded on the SSOP checklist.

Corrective actions taken during pre-operational sanitation inspection or during operations will be written on the back of the SSOP checklist as necessary.

_____ _____
Owners Signature Date

Example: Sanitation checklist

EXAMPLE OF SANITATION CHECKLIST

[NAME OF PROCESSING FACILITY]
SANITATION CHECKLIST

	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
Preoperational Sanitation Check							
Date:							
Time:							
Sanitizer used:_____ Sanitizer concentration:							
Tables in processing areas are clean and in good repair							
Skinning machine(s) is clean							
Hand tools are clean							
Cutting boards are clean							
Sinks are clean							
Walls are clean and free of residue							
Initials							
Operational Sanitation Check							
Time:							
Employees washed hands as necessary and used gloves when required							
All persons are wearing a clean apron and hair cover. Gloves worn as needed							
Waste containers are emptied when necessary							
Initials							

Key:
√ = Found acceptable
- = Not in use
× = Not acceptable

Corrective Actions are to be noted on corrective Sanitation Corrective Actions Log

Example: Sanitation Corrective Action log

EXAMPLE OF SANITATION CORRECTIVE ACTION

[NAME OF PROCESSING FACILITY]
SANITATION CORRECTIVE ACTION

Date	Problem identified	Handling of product	How sanitary conditions have been restored	Preventive measures	Initials of responsible employee
Example: 04/18/2017	Residue on gutting table during preoperational monitoring	No product affected, table not in use yet	Table was cleaned a sanitized.	Cleaning employees were re-train on cleaning and sanitizing procedure	HP

Task 7. Provide a written hazard analysis, a flow chart, and intended use. Domestic official establishments must conduct a hazard analysis, and document the results. After conducting the hazard analysis, establishments must develop and implement a written HACCP plan covering each product for which the hazard analysis revealed a food safety hazard that was reasonably likely to occur (RLTO). A hazard may be determined to be not reasonably likely to occur (NRLTO) if the nature of the process, or product, prevents the hazard from occurring or prerequisite programs are in place to prevent the hazard from occurring. If a hazard is determined to be NRLTO because a prerequisite program prevents the hazard, the establishment must have documentation to support the decisions in their hazard analysis. In accordance with the regulation, the hazard analysis **MUST** contain a flow chart that describes the steps for each process, product flow in the establishment, and intended use or consumers of the finished product.

Task 8. Provide a written recall plan. Domestic official establishments **MUST** develop and maintain a written recall plan in the event adulterated or misbranded product enters commerce. The written recall plan must contain the procedures the establishment will use for the recall of any product produced and shipped by the establishment, including how the establishment will determine the need for a product recall and all of the procedures the establishment will use to conduct the recall.

For complete guidance to USDA/FSIS Mandatory Inspection of Siluriformes fish and products derived from such fish, visit https://www.fsis.usda.gov/wps/wcm/connect/8ec92a7f-8f9b-45ae-b80f-7c336f7d6ff5/Compliance-Guideline-Siluriformes-Fish.pdf?MOD=AJPERES

HACCP*

HACCP concepts are:

- A preventive, not a reactive system.
- A management tool used to protect the food supply.

It is designed to minimize the risk of food-safety hazards.

(Image Source: https://www.nasa.gov)

Origins of HACCP:

- Pioneered in the 1960s.
- First used when foods were developed for the space program.
- Adopted by many food processors.

HACCP is not a stand-alone system
HACCP is built on a foundation of Good Manufacturing Practices

(Image Source: http://www.faxcim.co.jp/en/kankyo/img/haccp_img/kankei.gif)

*Adapted from Seafood HACCP Alliance for Training and Education, 2011.

Preliminary Steps

The first step to implement a HACCP plan is to assemble a HACCP team. The team should be a multidisciplinary group of individuals, which are directly involved with the plant's daily operations. The HACCP team will gather information about the products and the process that are needed to conduct a hazard analysis. These preliminary steps include:

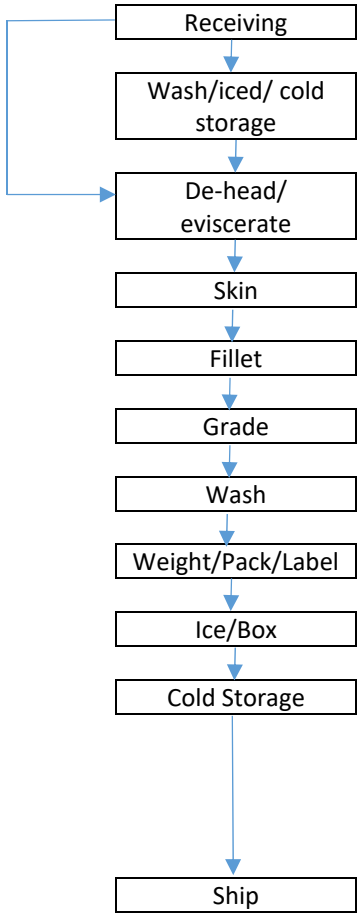
- *Description of the food and its distribution.*
- *Description of the intended use and consumers of the food.*
- *Development of a flow diagram and describes the process.*
- *Verification of the flow diagram.*

Example of catfish flow chart.

CATFISH FLOW CHART

"Fresh Fillet"

(From small and medium fish)



Example of process description.

Catfish Processing Steps

Operation	Description
Receiving Packaging Material	Incoming packaging materials are inspected and stored.
Receiving Catfish	Fish is received from fishermen, USDA inspected facilities, and/or docks. Fish is received in ice.
Wash	Fish/fillets are wash with potable water.
Grade	Fish is manually graded In some facilities, fish are loaded onto a weight grading system to be sized to the different processing lines.
De-head	Whole dressed fish are de-headed manually. In some facilities fish are de-headed using an electric band saw or mechanical de-header.
Fillet	Filleting may be accomplished using either manual or mechanical procedures.
Skin	Skin is removed from whole fish with a mechanical skinner using manual labor. In some facilities fish is skinned manually. In some facilities skin from fillets is mechanically removed after the fillets are cut.
Eviscerated	De-headed fish are manually eviscerated with a sharp knife and guts are dump in totes or buckets. In some facilities, de-headed fish are conveyed to the evisceration station where the operators using a sharp knife slit the fish and use a vacuum extractor to remove the viscera, or the fish are mechanically slit and eviscerated.
Portion	Large fillets are portioned by operators using a sharp knife.
Weigh/Pack/label	Fish are weight and placed in labeled bags. Frozen fish
Ice	Fresh fillets are iced before to be placed in cooler.
Box/label	Product is placed in individual or master cartons and labeled.
Freeze	Frozen products are freeze in blast freezer.
Glaze	In some facilities, frozen fillets are water glazed before packing to form a protective ice coating to prevent dehydration.
Cold Storage	Frozen Whole Collar, Frozen Fillets, and Frozen Whole Gutted fish are stored in holding freezer.
Cooler	Fresh product is iced and stored in cooler.
Ship	Product is selected by description and pack date and loaded into refrigerated trucks for distribution.

HAZARD

A hazard is a biological, chemical or physical agent that is reasonably likely to occur and which would result in an unacceptable health risk to consumers, if not controlled.

Biological Hazards

Biological hazards are microorganisms that are hazardous to humans. These hazardous microorganisms are called pathogens. Pathogens that are transmitted by food are called foodborne pathogens. The main pathogens associated with food are **pathogenic bacteria**, **viruses** and **parasites**.

Giardia lamblia – parasite commonly found in contaminated waters.

Hepatitis A – virus commonly transferred to food by ill food handlers (Picture from WebMD).

Pathogens have been associated with different food products. Here is a list of common food sources of foodborne pathogens:

- **Beef** – *Salmonella, E. coli 0157:H7, Clostridium perfringens, Listeria monocytogenes*.
- **Pork** – *Salmonella, C. perfringens, L. monocytogenes*.
- **Poultry** – *Salmonella, Campylobacter, C. perfringens, L. monocytogenes*.
- **Vegetables** – *Salmonella, E. coli 0157:H7, L. monocytogenes*.
- **Eggs** – *Salmonella*.

Undercooked hamburger patties have been associated with outbreaks of *E. coli* O157:H7 (Image source: www.foodsafety.com).

To prevent foodborne illness is important to practice good personal hygiene, cook food properly, hold foods at a proper temperature, and prevent cross-contamination.

Four steps to food safety: clean, separate, cook and chill (Image source: www.cdc.gov).

Chemical Hazards

- Naturally occurring: Some food products naturally produce toxins: e.g., tuna produces scombrotoxin due to time/temperature abuse. FDA has identified 8 major allergens, these are also considered chemical hazards. The eight major allergens are soy, eggs, milk, fish, wheat, shellfish, tree nuts, and peanuts.
- Intentionally introduced such as additives and preservatives, e.g. sodium nitrate.
- Unintentionally introduced such as antibiotics and pesticides.

Eight major allergens identified by FDA (Image source: www.foodsafetymagazine.com).

Physical Hazards

This are hazards that normally are not associated with the product. Can enter with raw material or can be introduced during processing, i.e. metal, glass, hair, etc.

SEVEN PRINCIPLES OF HACCP

1. Conduct a hazard analysis.
2. Determine the Critical Control Points (CCPs).
3. Establish critical limits.
4. Establish monitoring procedures.
5. Establish corrective actions.
6. Establish verification procedures.
7. Establish record keeping.

PRINCIPLE 1. HAZARD ANALYSIS

Hazard Analysis Procedure

- Best as team activity.
- Flow diagram showing each step.
- Analyze each step.
- List possible controls.
- Decide where and how to control (CCP).

In accordance with the regulation, the hazard analysis **MUST** contain a flow chart that describes the steps for each process, product flow in the establishment, and intended use or consumers of the finished product.

This is a two-stage process. In the first stage, the team lists potential hazards. In the second stage, the HACCP team determines which of the potential hazards are RLTO hazards that must be addressed in the

HACCP plan. To complete the hazard analysis, each step of the process needs to be analyzed for potential biological, chemical and physical hazards. HACCP team will brainstorm for possible hazards based on their knowledge and experience, guidance documents, and historical reference. After potential hazards are identified, HACCP team will determine 1) if potential hazards are RLTO, and 2) if it occurs, is it an unacceptable risk.

Hazard analysis including identification of control measures serve to:

- Identify hazards and possible control methods.
- Identify if modification to a process or product is needed.
- Provide a basis for identifying CCPs.

Hazard analysis **MUST** be kept and be available upon USDA request.

A hazard may be determined to be NRLTO if the nature of the process, or product, prevents the hazard from occurring or prerequisite programs are in place to prevent the hazard from occurring.

If a hazard is determined to be NRLTO because a prerequisite program prevents the hazard, the establishment must have documentation to support the decisions in their hazard analysis.

Example: Hazard Analysis filled form

HAZARD ANALYSIS – RAW PRODUCT – CATFISH	
Firm Name: *ABC LA catfish Inc.*	**Product Description:** *Fresh Catfish fillets*
Firm Location: *Anywhere* *In D'Bayou, LA*	**Method of storage & Distribution** *Refrigerated/in ice*
	Intended use & consumer: *To be cooked, general public*

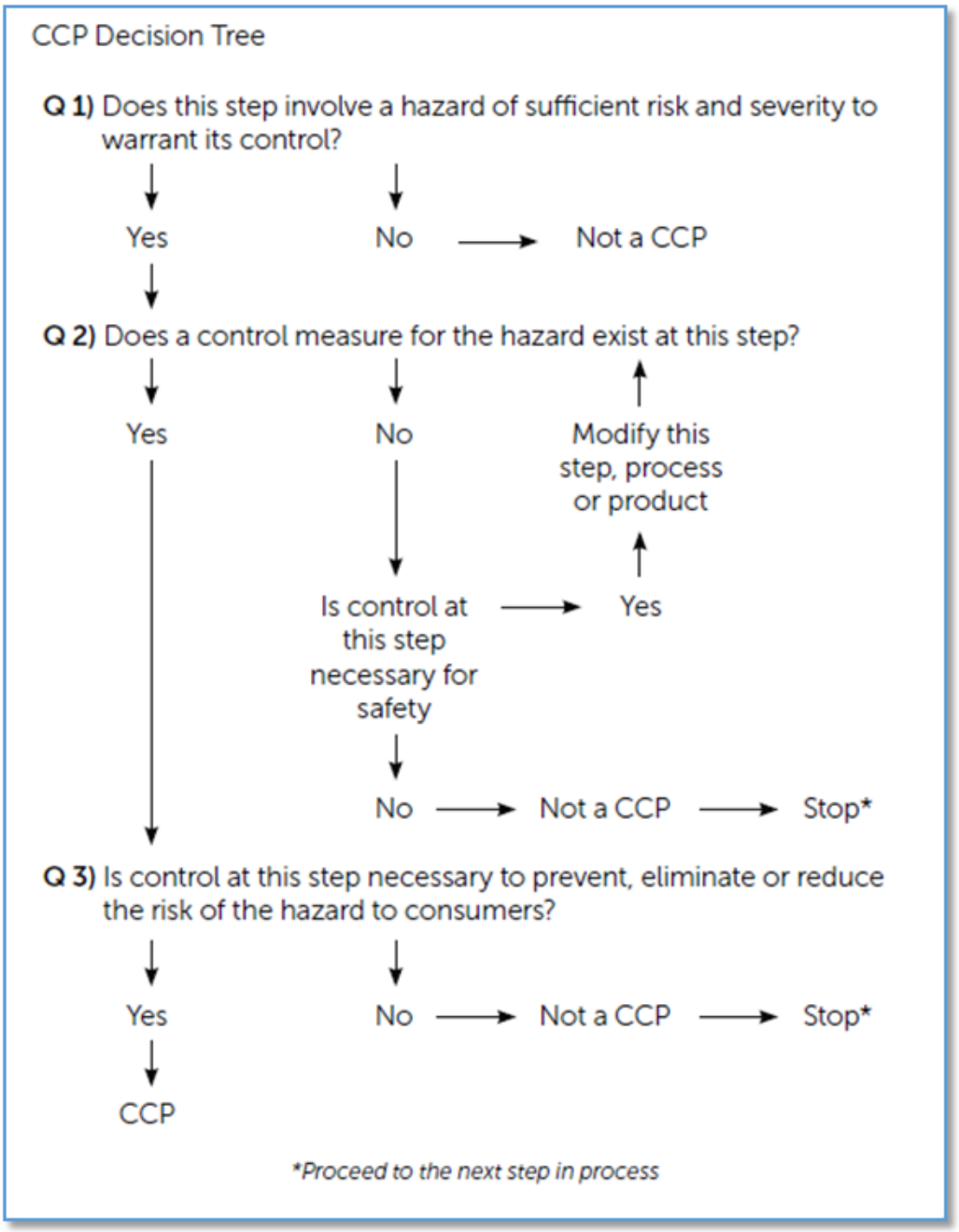
1	2	3	4	5	6
Process Step	**Food Safety Hazard**	**Reasonably likely to occur?**	**Justification**	**If Yes in column 3, What measures could be applied to prevent, eliminate or reduce the hazard to and acceptable level?**	**Critical Control Point**
Receiving packaging material	Biological – Microbial contamination	No	Packaging material specifications, store packaging material in designated areas and systematic review of incoming ingredients		
	Chemical – Chemical contamination	No	Packaging material specifications, store packaging material in designated areas and systematic review of incoming ingredients		
	Physical – Physical contamination	No	Packaging material specifications, store packaging material in designated areas and visual inspection		
Receiving Catfish	Biological – Microbial contamination	No	Product to be fully cooked		
	Chemical – Environmental Chemicals Allergen	No No	Company purchasing/receiving protocols Company allergen handling protocols		
	Physical	No	No hazard identified		

PRINCIPLE 2. ESTABLISH CRITICAL CONTROL POINTS

- **Critical Control Point (CCP)**: Is a step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
- There must be at least one CCP associated with each identified hazard.
- Some hazards may require multiple CCPs. Some CCPs may control multiple hazards.
- If more than one CCP can control the hazard, choose the best for the control of the hazard.
- Avoid an overabundance of CCPs.

CCP Decision Tree

It is a formalized method to determine if a step is a CCP, which consists of a series of questions. It is optional and can be applied at steps in which a food safety hazard may be prevented, eliminated or reduced to an acceptable level.



(Source: Seafood HACCP Alliance for Training and Education, 2011)

Exercise: With help of a partner, complete Hazard Analysis (assigned two steps of flow diagram).

HAZARD ANALYSIS WORKSHEET

Firm Name:	**Product Description:**
Firm Location	**Method of Storage & Distribution:**
Date:	**Intended Use & Consumer:**

(1) **Processing Steps**	(2) List all potential **food safety hazards** that could be associated with this product and process.	(3) Is the potential food safety hazard **significant** (introduced, enhanced or eliminated)<u>at this step?</u> **(Yes or No)**	(4) **Justify the decision** that you made in column 3	(5) What **control measure(s)** can be applied to prevent this significant hazard?	(6) Is this step a **Critical Control Point**? **(Yes or No)**

PRINCIPLE 3. ESTABLISH CRITICAL LIMITS

Critical limits (CL's) are conditions or criterion which, when met, assures that the hazard being controlled. CL's must be based upon science, and most be set to assure control of the hazard under worst-case scenario. There are hazards that may require multiple CL's. An important factor to remember is that CL's have to be measurable.

If a critical limit is not met (when deviation occurs), a corrective action MUST be performed and records kept.

Examples:

- Microbiological limits.
- Temperature-Time requirements of the product.
- Temperature-Time requirements of the process.

Is important to consider reliable sources of information to set CL's. Below, find list of some reliable sources of information:

- Scientific publications: journal articles, food science texts, microbiology texts.
- Regulatory guidelines state and local guidelines, tolerances and action levels.
- USDA guidelines, tolerances and action levels.
- FDA guidelines, tolerances and action levels.
- Experts: NACMCF (National Advisory Committee on Microbiological Criteria for Foods), thermal process authorities; consultants, food scientists/microbiologists, equipment manufacturers, sanitarians, university cooperative extension services, trade associations.
- Experimental studies: In-house experiments; contract labs.
- A critical limit that is less stringent than a regulatory agency's must be supported with sound scientific data.

Example: HACCP Plan form, Critical Limit principle filled.

HACCP Plan

CCP	Significant Hazard	Critical Limit	Monitoring				Corrective Action	Records	Verification
			What	How	Frequency	Who			
Fryer	Pathogen survival	Fry for ≥ 3 min.							

Firm name: Fry DAT

Product: Fried Catfish

Firm address: B'DAT lake Rd, New Orleans LA

Method of Storage and Distribution: Frozen

Signature: JS

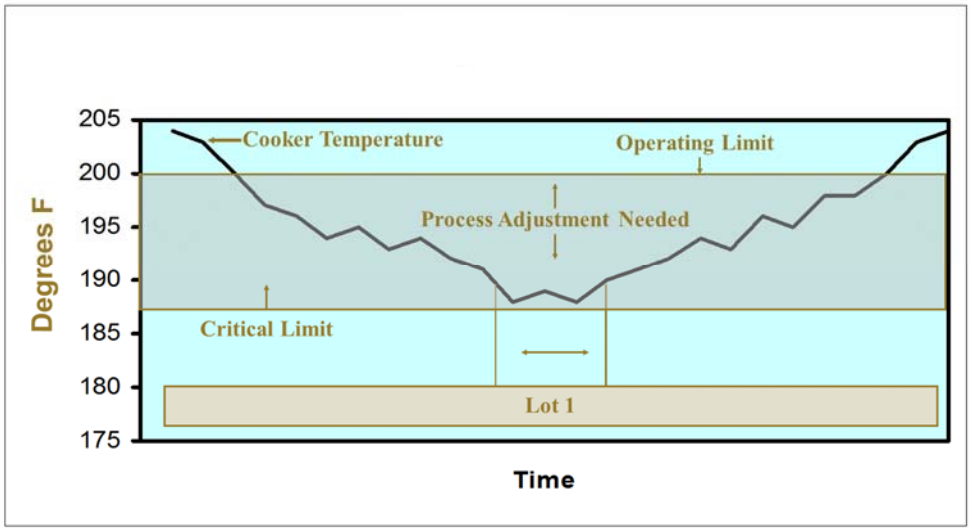
Intended use and consumer: To be heated and consumed by the general public

Print name: John Smith

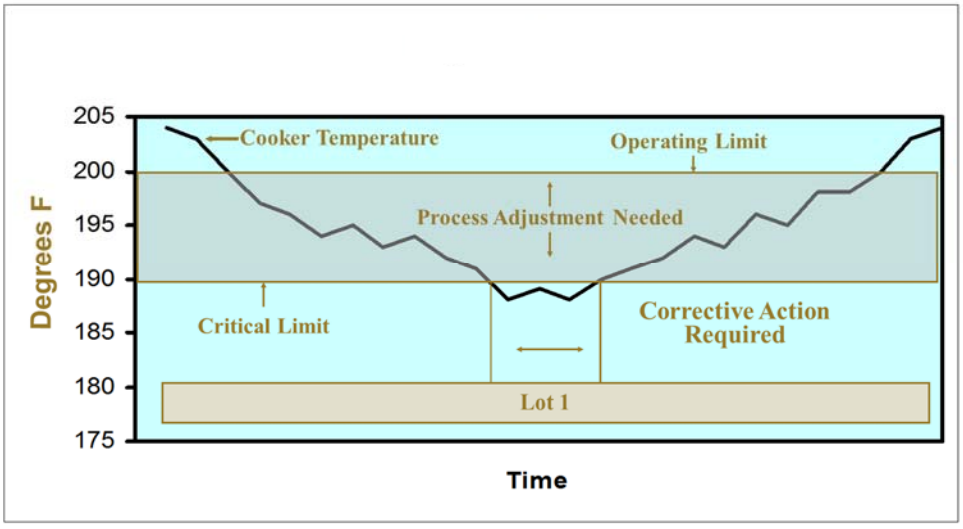
Date: 05/12/17

For quality reasons, to avoid exceeding a critical limit, or to account for normal variability some processors set operational limits. **Operating Limits are** criteria that are more stringent than CL's. Operational limits allow processors to take an action to bring the process back within operating limits, without having a deviation.

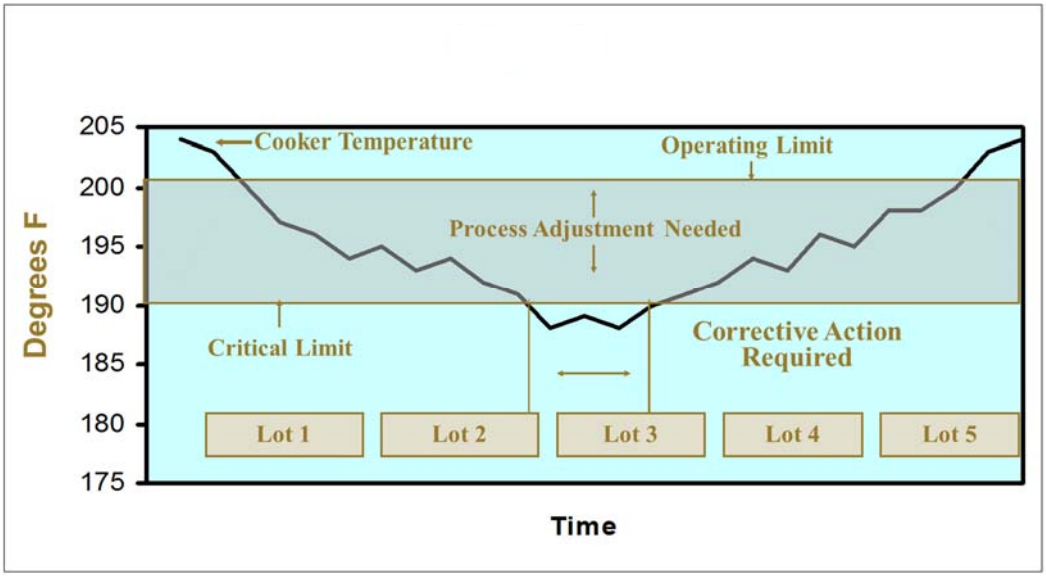
Operating Limit/Process Adjustment example



(Figure source: Seafood HACCP Alliance for Training and Education, 2011).



(Figure source: Seafood HACCP Alliance for Training and Education, 2011).



(Figure source: Seafood HACCP Alliance for Training and Education, 2011).

PRINCIPLE 4. CRITICAL CONTROL POINTS MONITORING

Monitoring are planned observations or measurements to determine if the CL's have been met and the CCP is under control.

Monitoring can help us:

- To track the operation of the process and enable the identification of trends toward a critical limit that may trigger process adjustments.
- To identify when there is loss of control (a deviation occurs at a CCP).
- To provide written documentation of the process control system.

ELEMENTS OF MONITORING:

- **WHAT**

  Usually a measurement or observation to assess if the CCP is operating within the critical limit.

- **HOW**

  Usually physical or chemical measurements (for quantitative CL's) or observations (for qualitative CL's). Needs to be real-time and accurate.

- **WHEN (FREQUENCY)**

  Can be continuous or intermittent.

- **WHO**

  Someone trained to perform the specific monitoring activity.

Example: HACCP plan form, monitoring principle filled.

HACCP Plan

CCP	Significant Hazard	Critical Limit	Monitoring				Corrective Action	Records	Verification
			What	How	Frequency	Who			
Fryer	Pathogen survival	Fry for ≥ 3 min.	Time catfish frying	Visually observe when catfish is in fryer, time with stopwatch	Each batch	Cook			

Firm name: Fry DAT

Firm address: B'DAT lake Rd, New Orleans LA

Signature: JS

Print name: John Smith

Product: Fried Catfish

Method of Storage and Distribution: Frozen

Intended use and consumer: To be heated and consumed by the general public

Date: 05/12/17

PRINCIPLE 5. CORRECTIVE ACTIONS

Corrective actions are taken when a critical limit is not met. Corrective actions MUST be responsibility of an individual who have understanding of the operation, the product(s), HACCP plan, and the authority to make decisions.

A complete corrective actions has two main components: 1) Identify the product that was produced during the process deviation, evaluate its safety and determine its disposition; and 2) correct and eliminate the cause of the deviation and restore process control.

Example: HACCP plan form, corrective action principle filled.

HACCP Plan

CCP	Significant Hazard	Critical Limit	Monitoring				Corrective Action	Records	Verification
			What	How	Frequency	Who			
Cooker	Pathogen survival	Boil for ≥ 3 min.	Time crawfish in boiling water	Visually observe when water starts boiling, time with stopwatch	Each batch	Cook	Evaluate product for internal temperature; if unacceptable (<185 oF) re-cook or destroy, determine cause of deviation and correct		

Firm name: Fry DAT

Firm address: B'DAT lake Rd, New Orleans LA

Signature: JS

Print name: John Smith

Product: Fried Catfish

Method of Storage and Distribution: Frozen

Intended use and consumer: To be heated and consumed by the general public

Date: 05/12/17

PRINCIPLE 6. RECORD KEEPING

Record keeping will allow reinforcing monitoring; will provide a "long term" picture of processing operation. Accurate record keeping is essential part of a successful HACCP program.

Types of HACCP records

There are four types of HACCP records:

1. HACCP plan and support documentation used in developing the plan:
    - HACCP plan.
    - Records related to performing hazard analysis and establishing CL's.
    - Data used to establish adequacy of barriers to pathogen growth or survival.
    - Data used to establish safe product shelf life.
    - Hazard Analysis Worksheet.
    - HACCP team members and their responsibilities.
    - Summary of preliminary steps taken in the development of a HACCP plan.
    - Prerequisite programs.
2. Records of CCP monitoring:
    - Kept to demonstrate control at CCPs.
    - Used to determine if CL's have been violated.
    - **All HACCP monitoring records should be on forms that contain the following information:**
        - Form title
        - Firm name and location
        - Time and date
        - Product information (including product type, package size, processing line and product code where applicable)
        - Actual observations or measurement
        - Critical limits
        - Monitor's signature or initials
        - Reviewer's signature or initials, and
        - Date of review

- A review of all monitoring records of critical control points shall occur within daily and pre-shipment.
- Monitoring information should be recorded at the time the observation or measurement is made.

Example: Daily cooker temperature log

Form Title: Daily cooker Temperature log						
Firm Name: Fry DAT				Firm address: B'DAT lake Rd., New Orleans LA		
Product Identification: Cooked, fried catfish						
Critical Limit: Frying for ≥ 3 min.				Monitoring activities:		
Date	Time	Product code	Time frying started	Cook time (min)	Critical limit met (Y/N)	Cook initials
Reviewers Signature:				Date of review:		

Example: Knife check CCP monitoring log

KNIFE CHECK

DAY:_____ **DATE:**_____

		MORNING ISSUE	MONIT. INIT.	VERIFIER'S INITIALS (MORNING)	NOON CHECK	MONIT. INIT.	EVENING DROP	MONIT. INT.	VERIFIER'S INITIALS (EVENING)	BLADE REPLACEMENT [Circle One]
1	Peter T.									YES / NO
2	Derek L.									YES / NO
3	Shawn A.									YES / NO
4	Jahvonta Z.									YES / NO
5	Marcus T.									YES / NO
6	Tyrone E.									YES / NO
7	Greg L.									YES / NO
8										YES / NO
9										YES / NO
10										YES / NO
11										YES / NO
12										YES / NO
		VERIF. INIT. ____					VERIF. INIT. ____			

QA Supervisor : _____

Production Manager : _____

3. Records of corrective action:
    - What happened?
    - What product was involved?
    - What was done to correct the cause of the deviation?
    - What was done with the product?
    - Identify firm, the location and time and individual attesting to the corrective action.

Example corrective action

[COMPANY NAME]

CORRECTIVE ACTION LOG

Date	Problem identified	Handling of product	How unacceptable conditions have been restored	Preventive measures	Initials of responsible employee

4. Records of verification activities
    - **Should include information on verification activities such as:**
        - Modifications of the HACCP Plan.
        - Audits of supplier compliance with guarantees or certifications.
        - Calibration records.
        - Microbiological tests.
        - Challenge tests, environmental tests, in-line tests, finished product tests.
        - Results of in-house, on-site inspections.
        - Equipment evaluation tests.
    - Examples:
        - Temperature distribution studies for thermal processes.
        - Metal detector challenges.
        - Calibration studies.
        - Employee training.

Example: Documentation of heat distribution study

May 9, 2011
John J. Smith, President
ABC Shrimp Company
One Saltwater Lane
Seaside, FL 33333
Dear Mr. Smith,
Temperature distribution tests were performed on April 19, 2011 on the steam cooker located at ABC Shrimp Company in Sunshine, Florida.
Data was collected from ten thermocouples and continuous temperature logger during three production runs. Test results indicate that temperature distribution profiles in your cooker ranged from 212 to 214°F.
These studies show that your steam cooker, when run properly, continues to operate as designed.
Sincerely,
I.M. Helpful
Seafood Processing and Research Unit
Your State University

(Figure source: Seafood HACCP Alliance for Training and Education, 2011).

Example: Documentation of heat penetration validation study.

May 9, 2011
John J. Smith, President
ABC Shrimp Company
One Saltwater Lane
Seaside, FL 33333
Dear Mr. Smith,

Heat penetration tests have been completed for your "Ready-to-eat, peeled and deveined shrimp" processed in a continuous steam cooker at your facility on April 19, 2010 using a portable data logger and 12 thermocouple leads.

Observations were made of internal product temperatures for six shrimp from individual lots of large (3.5 to 5.0 shrimp per oz.), medium (5.0 to 9.0 shrimp per oz.), and small (9.0 to 17.0 shrimp per oz.) processed in the steam cooker during production runs at 212°F for three minutes.

The internal temperature of large shrimp exceeded 165°F, medium shrimp 170°F, and small shrimp 180°F. The internal product temperatures noted during these tests exceed your firm's HACCP critical limits of an internal temperature of 165°F for 40 seconds.

Our studies revealed that shrimp processed at 212°F for three minutes delivered an internal product temperature above 165°F for a minimum of 40 seconds. These temperatures are equivalent to a 6-D process for elimination of *Listeria monocytogenes*.

These data serves as your annual thermal process validation study. If parameters change, such as cooking temperature, time, shrimp size, shrimp volumes, then you should repeat the thermal process validation study to ensure an adequate cook is being achieved in your process.

Sincerely,
I.M. Helpful
Seafood Processing and Research Unit
Seafood Process Authority

(Figure source: Seafood HACCP Alliance for Training and Education, 2011)

Example: Employee training records.

Employee training report (pre-requisite document)

Form Title: Employee Training Report	
Employee Name:	**Hire Date**
Employee Training Course	**Date Completed**
USDA/FSIS catfish compliance workshop provided by Your University Extension program.	August 1, 2017
Good manufacturing practices (GMP's) provided in house by QA personnel.	September 04, 2017
Sanitation in the processing plant, 4-hour class, state inspection service. Update.	October 19, 2017

PRINCIPLE 7. ESTABLISH VERIFICATION PROCEDURES

It is required that verification procedures be established to assure the HACCP program is effective. Verification are those activities, other than monitoring, that determine the validity of the HACCP plan and that verify the system is operating according to the plan.

- Elements of Verification:
    - Validation.
    - CCP verification activities.
    - Calibration of monitoring devices.
    - Calibration record review.
    - Targeted sampling and testing.
    - CCP record review.
    - HACCP system verification.
    - Observations and reviews.
    - Microbiological end-product testing.
    - Regulatory agencies.

Validation: The element of verification focused on collecting and evaluating scientific and technical information to determine if the HACCP plan, when properly implemented, will effectively control the hazards. Validation as part of verification.

- The HACCP plan is validated by HACCP team, or an Individual qualified by training or experience.
- Validation involves a scientific and technical review of the rationale behind each part of the HACCP plan from hazard analysis through each CCP verification strategy.

When validation must be done:

- Initially.
- When factors warrant, e.g.,
  - Changes in raw materials
  - Changes in product or process
  - Adverse review findings
  - Recurring deviations
  - New information on hazards or control measures
  - On-line observations
  - New distribution or consumer handling practices
- Examples of Validation Activities
  - Smoked catfish
  - Verify that the internal temperature of the crawfish reaches the required temperature for the required time under the worst case conditions (experiment)
  - Confirm that the required internal temperature and time are adequate to control pathogens
  - Literature review for new or emerging pathogens

CCP Verification procedures

- Calibration
- Calibration record review
- Targeted sampling and testing
- CCP record review
  - Monitoring records
  - Corrective action records

HACCP System Verification

- Determines if the HACCP plan is being followed

HACCP System Verification Frequency

- Annually
- Occurrence of a system failure or significant change in production or process

Example: Verification schedule

Activity	**Frequency**
Initial validation of HACCP plan	Prior to and during initial implementation of plan
Subsequent validation of HACCP plan	When CL's change, significant changes in process occurred, equipment failed, system failed, etc.
Verification of CCP monitoring as described in the plan (checking blades at beginning of shift, noon and end of the day)	According to HACCP plan (e.g., daily record review)
Review of monitoring and corrective action records to show compliance with plan	Daily and pre-shipment
Reassessment of the HACCP plan	Yearly

Example: HACCP plan

HACCP Plan

CCP	Significant Hazard	Critical Limit	Monitoring				Corrective Action	Records	Verification
			What	How	Frequency	Who			
Fryer	Pathogen survival	Fry for ≥ 3 min.	Time crawfish in boiling water	Visually observe when water starts boiling, time with stopwatch	Each batch	Cook	Evaluate product for internal temperature; if unacceptable (<185 °F) re-cook or destroy, determine cause of deviation and correct	Frying log Calibration log Corrective action log	Review CCP records daily Pre-shipment review CCP records Calibrate stop watch monthly Review cooks training monthly Check internal temperature of 3 catfish fillets monthly

Firm name: Fry DAT

Product: Fried Catfish

Firm address: B'DAT lake Rd, New Orleans LA

Method of Storage and Distribution: Frozen

Signature: JS

Intended use and consumer: To be heated and consumed by the general public

Print name: John Smith

Date: 05/12/17

PREREQUISITE PROGRAMS

HACCP is part of a complete food safety system. HACCP is a preventive system to ensure food safety, but it is not a stand-alone program. To be effective, it must be built upon existing food safety programs. Prerequisite programs will provide a good foundation for the HACCP program. Here is a list of some prerequisite programs that apply to catfish processing:

- Sanitation Performance (Facility) Standards procedures.
- Catfish purchasing/receiving procedures.
- Cold chain management program.
- Allergen handling program.
- Recall plan.
- Food Defense Plan program.
- Lockout/tagout program.

RECALL PLAN

A Recall is a voluntary action conducted by a firm to remove adulterated or misbranded product from commerce. Although it is a firm's decision to recall a product, FSIS coordinates with firm to ensure that you have identified and removed recalled product from commerce. FSIS also notifies the public about product recalls.

Types of recalls

- Class I – Reasonable probability that eating the product will cause serious, adverse health consequences or death.
- Class II – There is a remote probability of adverse health consequences if the product is eaten.
- Class III – Eating the product will not cause adverse health consequences.

Federal regulation (9 CFR 418), requires official establishments to prepare and maintain written recall plans. This plan MUST address the following:

- How it will decided whether to conduct a product recall,
- and describe the procedures follow if product recall is necessary.

Recall plan must be available to FSIS inspectors for review upon request.

APPENDIX 1 – SPS, SANITIZING PROGRAM & SSOP's

EXAMPLE OF A BASIC WRITTEN SSOP

NAME OF PROCESSING FACILITY
SANITATION STANDARD OPERATING PROCEDURES

Owner: _____

Pre-operational
All food contact surfaces of the facility, equipment, and utensils in processing rooms will be cleaned daily after production by rinsing, soaping, and sanitizing. All cleaning will be monitored daily by plant manager or designee before production begins each day. Records will be kept on the SSOP checklist.

Cooler temperature will be maintained at 38

Operational
Every day, all equipment and surfaces in the processing room will be kept as sanitary as necessary to prevent contamination or adulteration of the carcasses/product.

Every day, all employees will follow hygienic practices to keep themselves from contaminating or adulterating the product. These actions will be monitored by plant manager or designee once per day and recorded on the SSOP checklist.

Corrective actions taken during pre-operational sanitation inspection or during operations will be written on corrective action form as necessary.

_____ _____
Owners Signature Date

EXAMPLE OFSANITIZING PROGRAM

NAME OF PROCESSING FACILITY

SANITIZING PROGRAM

PURPOSE AND BACKGROUND INFORMATION

To prevent product adulteration, food contact surfaces should be properly clean and sanitized. Sanitizer solution concentration monitoring is important to prevent chemical contamination of the product.

The purpose of this protocol is to protect product from adulteration.

PROCEDURES

- Food contact surfaces will be sanitized with a bleach solution of 50 to 100 ppm of chlorine.
- The concentration of chlorine will be monitored daily with test strips.
- If these conditions are not met, a corrective action will implemented and documented in corrective action log.

RECORDS

- Sanitation checklist
- Corrective Action Log

EXAMPLE OF SANITATION CHECKLIST

[NAME OF PROCESSING FACILITY]
SANITATION CHECKLIST

	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
Preoperational Sanitation Check							
Date:							
Time:							
Sanitizer used:_____ Sanitizer concentration:							
Tables in processing areas are clean and in good repair							
Skinning machine(s) is clean							
Hand tools are clean							
Cutting boards are clean							
Sinks are clean							
Walls are clean and free of residue							
Initials							
Operational Sanitation Check							
Time:							
Employees washed hands as necessary and used gloves when required							
All persons are wearing a clean apron and hair cover. Gloves worn as needed							
Waste containers are emptied when necessary							
Initials							

Key:
√ = Found acceptable
- = Not in use
× = Not acceptable

Corrective Actions are to be noted on corrective Sanitation Corrective Actions Log

XAMPLE OF SANITATION CORRECTIVE ACTION

[NAME OF PROCESSING FACILITY]
SANITATION CORRECTIVE ACTION

Date	**Problem identified**	**Handling of product**	**How sanitary conditions have been restored**	**Preventive measures**	**Initials of responsible employee**
Example: 04/18/2017	Residue on gutting table during preoperational monitoring	No product affected, table not in use yet	Table was cleaned a sanitized.	Cleaning employees were re-train on cleaning and sanitizing procedure	HP

XAMPLE OF CORRECTIVE ACTION LOG

[NAME OF PROCESSING FACILITY]
CORRECTIVE ACTION LOG

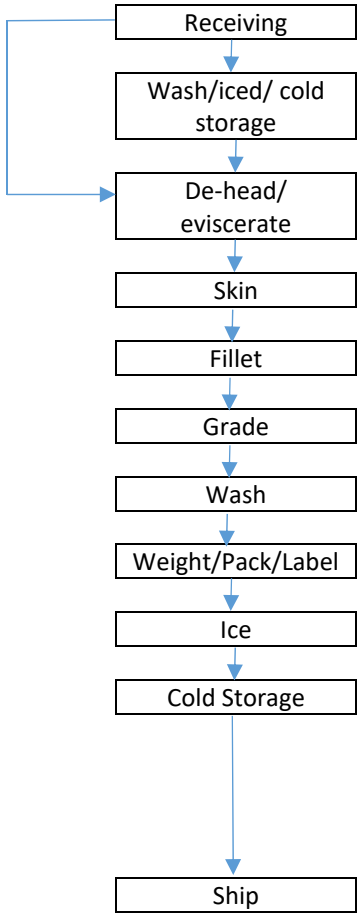
Date	Problem identified	Handling of product	How unacceptable conditions have been restored	Preventive measures	Initials of responsible employee

APPENDIX 2 – FLOW CHART, PROCESS DESCRIPTION & HA

CATFISH FLOW CHART

"Fresh Fillet"

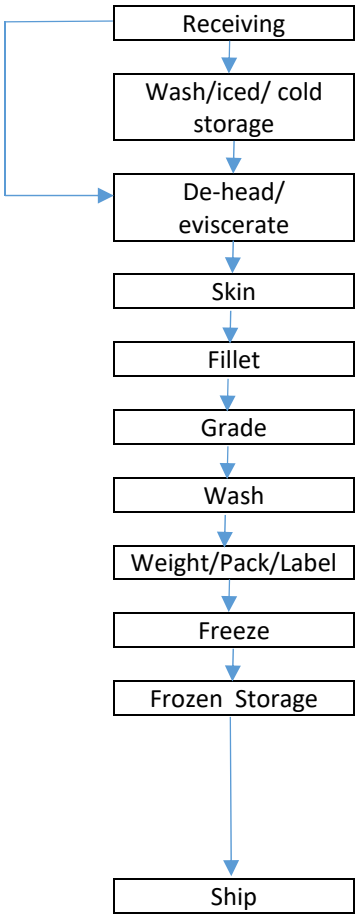
(From small and medium fish)



CATFISH FLOW CHART

"Frozen Fillet"

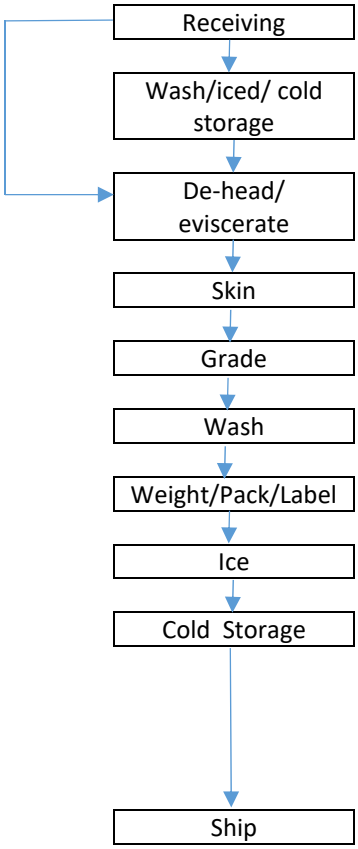
(From small and medium fish)



CATFISH FLOW CHART

"Fresh Collarbone"

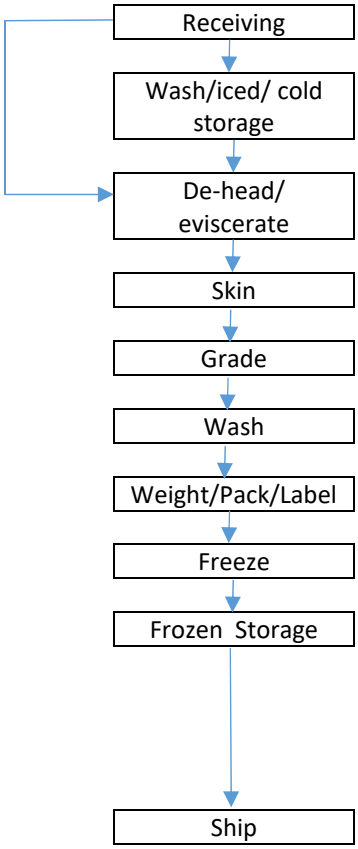
(From small and medium fish)



ATFISH FLOW CHART

"Frozen Collarbone"

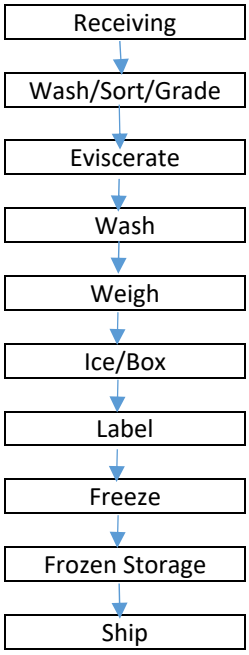
(From small and medium fish)



ATFISH FLOW CHART

"Frozen Whole Gutter"

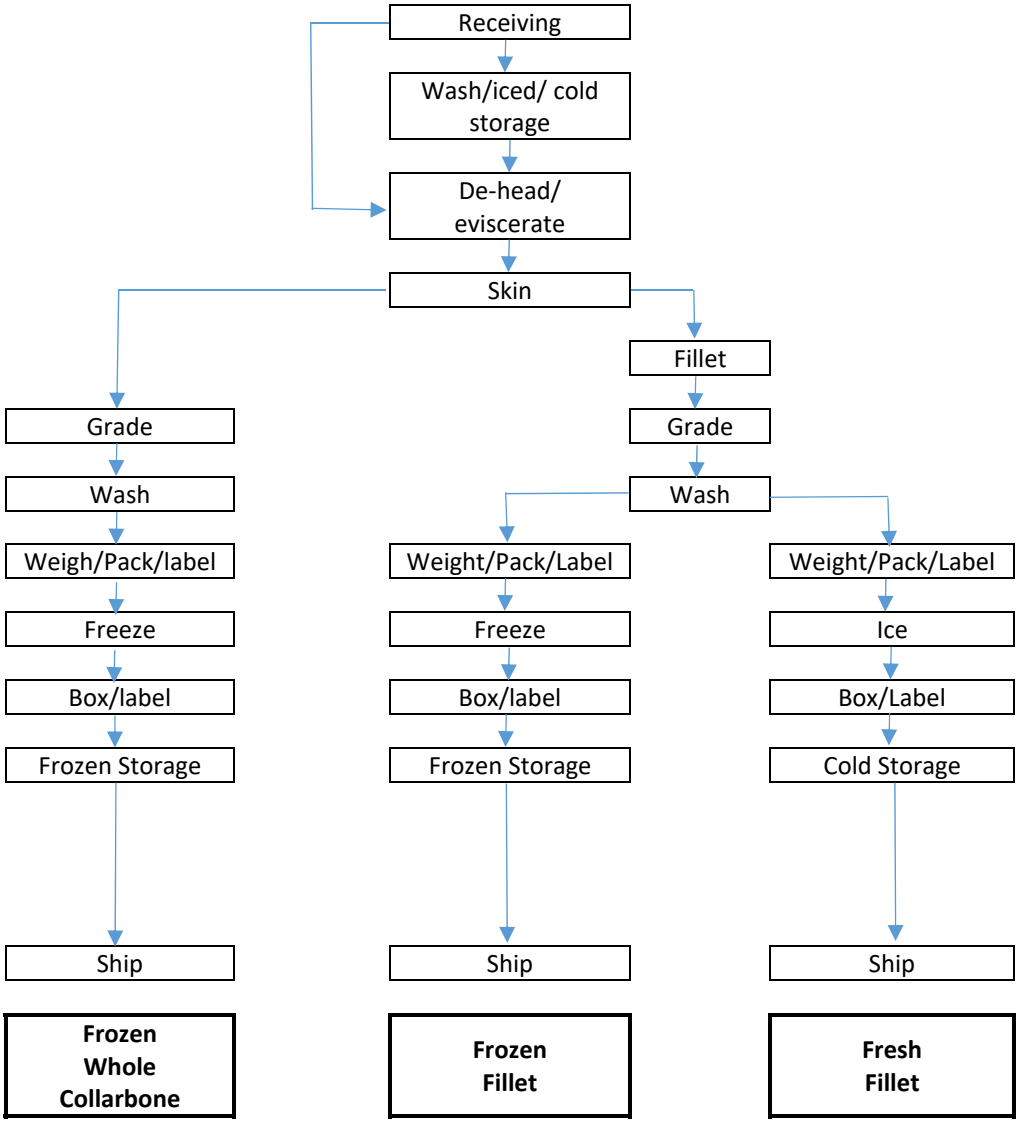
(From large fish)



ATFISH FLOW CHART

"Frozen Whole Collarbone, Frozen Fillet, & Fresh Fillet"

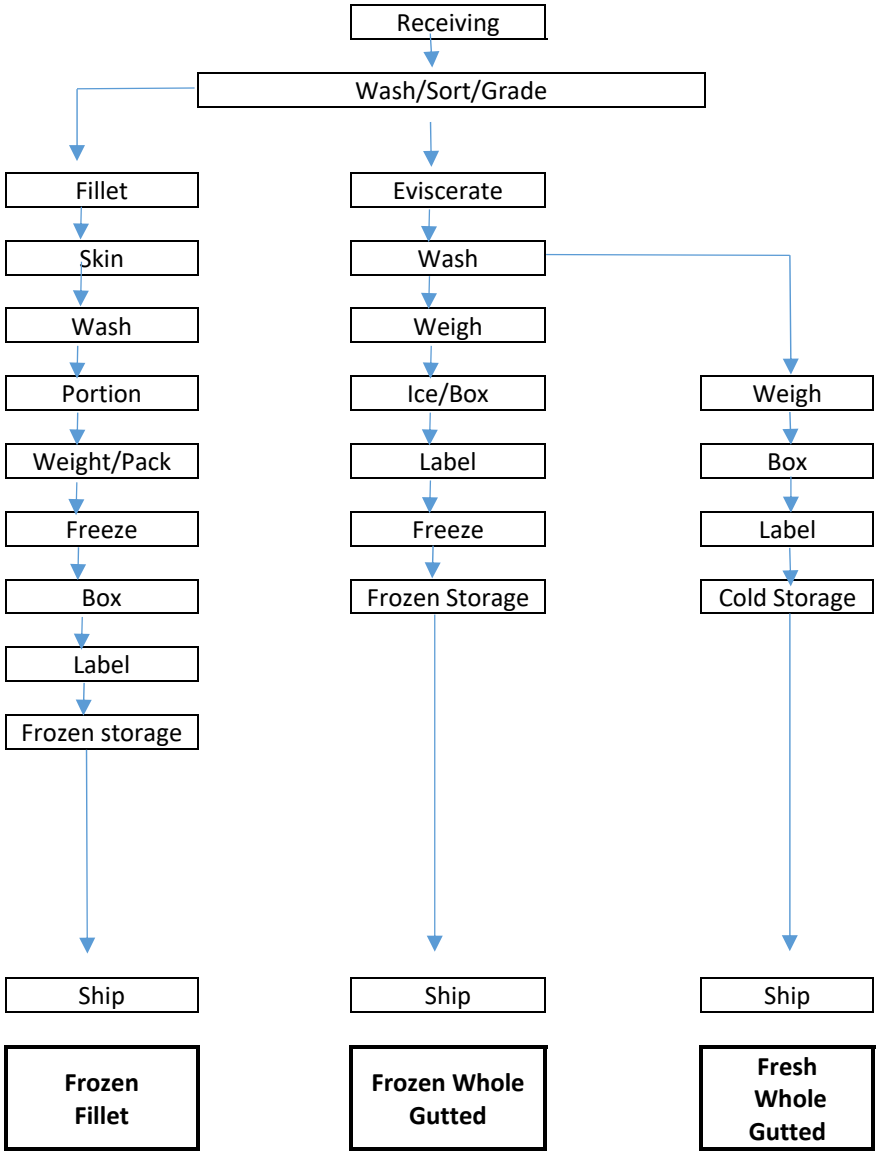
(From small and medium fish)



CATFISH FLOW CHART

"Frozen Fillet, Frozen Whole Gutter, & Fresh Whole Gutted"

(From large fish)



Catfish Processing Steps

Operation	Description
Receiving Packaging Material	Incoming packaging materials are inspected and stored.
Receiving Catfish	Fish is received from fishermen, USDA inspected facilities, and/or docks. Fish is received in ice.
Wash	Fish/fillets are wash with potable water.
Grade	Fish is manually graded. In some facilities, fish are loaded onto a weight grading system to be sized to the different processing lines.
De-head	Whole dressed fish are de-headed manually. In some facilities fish are de-headed using an electric band saw or mechanical de-header.
Fillet	Filleting may be accomplished using either manual or mechanical procedures.
Skin	Skin is removed from whole fish with a mechanical skinner using manual labor. In some facilities fish is skinned manually. In some facilities skin from fillets is mechanically removed after the fillets are cut.
Eviscerated	De-headed fish are manually eviscerated with a sharp knife and guts are dump in totes or buckets. In some facilities, de-headed fish are conveyed to the evisceration station where the operators using a sharp knife slit the fish and use a vacuum extractor to remove the viscera, or the fish are mechanically slit and eviscerated.
Portion	Large fillets are portioned by operators using a sharp knife.
Weigh/Pack/label	Fish are weight and placed in labeled bags.
Ice	Fresh fillets are iced before to be placed in cooler.
Box/label	Product is placed in individual or master cartons and labeled.
Freeze	Frozen products are freeze in blast freezer.
Glaze	In some facilities, frozen fillets are water glazed before packing to form a protective ice coating to prevent dehydration.
Cold Storage	Frozen Whole Collar, Frozen Fillets, and Frozen Whole Gutted fish are stored in holding freezer.
Cooler	Fresh product is iced and stored in cooler.
Ship	Product is selected by description and pack date and loaded into refrigerated trucks for distribution.

HAZARD ANALYSIS – RAW PRODUCT – CATFISH	
Firm Name: *ABC LA catfish Inc.*	**Product Description:** *Fresh Catfish fillets*
Firm Location: *Anywhere* *In D'Bayou, LA*	**Method of storage & Distribution** *Refrigerated/in ice*
	Intended use & consumer: *To be cook, general public*

1	2	3	4	5	6
Process Step	**Food Safety Hazard**	**Reasonably likely to occur?**	**Justification**	**If Yes in column 3, What measures could be applied to prevent, eliminate or reduce the hazard to and acceptable level?**	**Critical Control Point**
Receiving packaging material	Biological – Microbial contamination	No	Packaging material specifications, store packaging material in designated areas and systematic review of incoming ingredients		
	Chemical – Chemical contamination	No	Packaging material specifications, store packaging material in designated areas and systematic review of incoming ingredients		
	Physical – Physical contamination	No	Packaging material specifications, store packaging material in designated areas and visual inspection		
Receiving Catfish	Biological – Microbial contamination	No	Product to be fully cooked		
	Chemical – Environmental Chemicals Allergen	No No	Company purchasing/receiving protocols Company allergen handling protocols		
	Physical	No	No hazard identified		

1	2	3	4	5	6
Process Step	**Food Safety Hazard**	**Reasonably likely to occur?**	**Justification**	**If Yes in column 3, What measures could be applied to prevent, eliminate or reduce the hazard to and acceptable level?**	**Critical Control Point**
Wash	Biological – Pathogen from non-potable water	No	City water bill & report		
	Chemical – Incorrect sanitizer levels	No	Sanitizer prerequisite in place		
	Physical	No	No hazard identified		
Sort/Grade	Biological	No	No hazard identified		
	Chemical	No	No hazard identified		
	Physical	No	No hazard identified		
De-head	Biological – Pathogen from non-potable water	No	City water bill & report		
	Chemical – Incorrect sanitizer levels	No	Sanitizer prerequisite in place		
	Physical	No	No hazard identified		
Fillet	Biological – Pathogen from non-potable water	No	City water bill & report		
	Chemical – Incorrect sanitizer levels	No	Sanitizer prerequisite in place.		
	Physical	No	No hazard identified		
Skin	Biological – Pathogen from non-potable water	No	City water bill & report		
	Chemical – Incorrect sanitizer levels	No	Sanitizer prerequisite in place		
	Physical	No	No hazard identified		
Eviscerated	Biological – Pathogen from non-potable water	No	City water bill & report		
	Chemical – Incorrect sanitizer levels	No	Sanitizer prerequisite in place		
	Physical	No	No hazard identified		

1	2	3	4	5	6
Process Step	**Food Safety Hazard**	**Reasonably likely to occur?**	**Justification**	**If Yes in column 3, What measures could be applied to prevent, eliminate or reduce the hazard to and acceptable level?**	**Critical Control Point**
Portion	Biological – Pathogen from non-potable water	No	City water bill & report		
	Chemical – Incorrect sanitizer levels	No	Sanitizer prerequisite in place		
	Physical	No	No hazard identified		
Weigh	Biological	No	No hazard identified		
	Chemical	No	No hazard identified		
	Physical	No	No hazard identified		
Box/label	Biological	No			
	Chemical - Allergen	No	Product is labeled following allergen pre-requisite program		
	Physical	No	No hazard identified		
Freeze	Biological	No	No hazard identified		
	Chemical	No	No hazard identified		
	Physical	No	No hazard identified		
Glaze	Biological – Pathogen from non-potable water	No	City water bill & report		
	Chemical – Incorrect sanitizer levels	No	Sanitizer prerequisite in place		
	Physical	No	No hazard identified		
Frozen storage	Biological	No	Company frozen and cold storage monitoring protocol		
	Chemical	No	No hazard identified		
	Physical	No	No hazard identified		
Cooler	Biological	No	Company frozen and cold storage monitoring protocol		
	Chemical	No	No hazard identified		
	Physical	No	No hazard identified		
Shipping	Biological	No	No hazard identified		
	Chemical	No	No hazard identified		
	Physical	No	No hazard identified		

APPENDIX 3 – PURCHASING/RECEIVING

EXAMPLE OF COMPANY PURCHASING/RECEIVING PROTOCOL

[NAME OF PROCESSING FACILITY]

PURCHASING/RECEIVING PROTOCOL

PURPOSE AND BACKGROUND INFORMATION

The purpose of this protocol is to identify the source of catfish process in our facility.

As to date, FSIS has not identify any environmental chemical hazard associated to wild catfish. However, the identification of source of catfish will provide valuable information in case an environmental hazard is identified.

PROCEDURES

- All fish purchase by our facility will be come from licensed commercial fisherman or USDA inspected facility.
- For all fish purchase from commercial fisherman a trip ticket will be filled and save in file.
- For all fish purchase from a USDA inspected facility, a letter guaranty will be keep in file and updated once a year.
- Packaging material will be examined for signs of damage or any conditions that can adulterate the fish. If packaging material is damage or shows any conditions that can adulterate the fish, packaging material will be rejected.
- If these conditions are not met, a corrective action will be implemented and documented in corrective action log.

RECORDS
- Trip tickets
- Letter(s) of guaranty
- Packaging material receiving log
- Corrective Action Log

APPENDIX 4 – COLD STORAGE MONITORING PROGRAM

EXAMPLE OF COLD STORAGE MONITORING PROGRAM

NAME OF PROCESSING FACILITY
COLD AND FROZEN STORAGE MONITORING PROGRAM

PURPOSE AND BACKGROUND INFORMATION
The purpose of this program is to prevent the growth of pathogens during catfish process. As to date, FSIS has not identified a pathogen of concern for catfish.

PROCEDURES
- All fresh product is stored in cold storage, and frozen product is stored in frozen storage.
- Temperature of cold storage is keep at 40°F or bellow. Temperature is check twice a day with accurate thermometer.
- Temperature of frozen storage is keep at 32°F or bellow. Temperature is check twice a day with accurate thermometer.
- If these conditions are note met, a corrective action will be implemented and documented on corrective action log.

RECORDS
- Cold and frozen storage temperature log
- Thermometer accuracy check log
- Corrective action log

EXAMPLE THERMOMETER ACCURACY CHECK LOG

[NAME OF PROCESSING FACILITY]

THERMOMETER ACCURACY CHECK LOG

FORM START DATE:
FORM FINISH DATE

DATE	TIME	THERMOMETER IDENTIFICATION	REFERENCE TEMPERATURE	Actual temperature on thermometer	INITIALS	COMMENTS	VERIFIED BY/DATE

EXAMPLE COLD AND FROZEN STORAGE LOG

[NAME OF PROCESSING FACILITY]

COLD AND FROZEN STORAGE LOG

DATE	COLD STORAGE (≤40°F)	FROZEN STORAGE (≤-32°F)	INITIALS

APPENDIX 5 – ALLERGEN HANDLING

EXAMPLE OF ALLERGEN HANDLING PROGRAM

NAME OF PROCESSING FACILITY
ALLERGEN MANAGEMENT PROGRAM

PURPOSE AND BACKGROUND INFORMATION
It is generally recommended that consumers allergic to fish should avoid all fish. Catfish is not within the most common kinds of fish that individuals are allergic. The only allergen that we process at our processing plant is fish. The purpose of this program is to prevent undeclared allergen goes out to commerce.

PROCEDURES
- Catfish processing is kept separated from other fish products by time or space.
    - By time: before processing catfish all food contact surfaces will be cleaned and sanitized.
    - By space: we have designated an specific area for catfish processing.
- Check that all catfish product is label with correct market name.
- If these conditions are not met, a corrective action will be implemented and documented in corrective action log.

RECORDS
- Sanitation checklist
- Catfish label check log
- Corrective action log

*This program is design for a fish only processing facility.
**If you also process shellfish or other major allergens of concern in your processing facility, you will need to include controls to address these other allergens.

EXAMPLE CATFISH LABEL CHECK LOG

[NAME OF PROCESSING FACILITY]

LABEL CHECK LOG

DATE	TIME	PRODUCT PRESENTATION	"CATFISH" NAME ON LABEL	INITIALS

A = Acceptable
U = Unacceptable

Corrective Actions are to be noted on corrective Sanitation Corrective Actions Log

EXAMPLE OF CORRECTIVE ACTION LOG

[NAME OF PROCESSING FACILITY]

CORRECTIVE ACTION LOG

Date	Problem identified	Handling of product	How unacceptable conditions have been restored	Preventive measures	Initials of responsible employee

APPENDIX 6- PRE-SHIMPMENT RECORD REVIEW

EXAMPLE OF CORRECTIVE ACTION LOG

[NAME OF PROCESSING FACILITY]

PRE-SHIPMENT RECORD REVIEW LOG

DATE	A/U or DNP	SIGNATURE

A = Acceptable
U = Unacceptable
DNP = Did Not Process

APPENDIX 7 – LETTER OF GUARANTEE

[COMPANY NAME]
[COMPANY ADDRESS]
[COMPANY PHONE NUMBER]

[DATE]

LETTER OF GUARANTEE

[Company Requesting]

[COMPANY NAME] hereby guarantees that all catfish and catfish products delivered to buyer, are coming from Official Establishment # [EST. NUMBER] and have been processed under USDA inspection in compliance with Mandatory Inspection of Fish of the Order Siluriformes and Products from such Fish Regulation. The intended use of the product is to be fully cooked by the consumer.

The guarantees given herein are continuing and shall be in full force and effect until revoked in writing.

Sincerely,

[COMPANY CONTACT]
[CONTACT TITLE]

APPENDIX 8 - RECALL PLAN

RECALL PLAN TEMPLATE

RECALL PLAN

Establishment name: _____

Establishment location: _____

FSIS establishment number: _____

Date: _____

Recall Coordinator (person responsible for coordinating recalls at this firm):
Name:
Phone:
Fax:
E-mail:

Recall Team/Contacts

Name	Contact information (company, address, phone number, fax number, e-mail address)	Role (in plant, supplier, distributor, customer, District Office)

PROCEDURES FOR DETERMINING A RECALL

Health Hazard Evaluation

- Is there an undeclared allergen in the plant's product?
  - ❑ Yes ❑ No

If yes, describe the details: _____

_____

_____

- Was product under processed?
  - ❑ Yes ❑ No

If yes, describe the details: _____

_____

_____

- Has product tested positive for a pathogen?
  - ❑ Yes ❑ No

If yes, describe the details: _____

_____

_____

- Are there reports of disease or injury occurring due to product?
  - ❑ Yes ❑ No

If yes, describe the details: _____

_____

_____

- How did the plant receive word of a problem with the product?

- How serious is the hazard?

- Are some groups at more risk to the hazard in the product?

- Other details:

RECORDS

What system of records will be used to manage and track the recall?

- ❑ Product identification, product coding, product lots
- ❑ Distribution records
- ❑ Consignee records

Other details related to records:

_____

_____

_____

_____

Include a copy of all records used for this recall as an Appendix to this plan.

RECALL DEPTH

Check all levels that the recall includes.

- ❑ Wholesale (warehouse, storage)
- ❑ Retail
- ❑ Hotels, restaurants, and institutions
- ❑ Consumer
- ❑ Other (describe) _____

RECALL NOTICE

(See sample of Recall Notice in Guidebook).
Include a copy of the Recall Notice used as an Appendix to this plan.

RECALL NOTICE TRACKING

The Recall Notice was issued to the following companies or individuals. (Include all records, such as fax received receipts, copies of e-mail responses, etc.)

Notice sent to (company/individual name)	Method used to send the Notice	Date the Notice was sent	Date response was received indicating a response from company/individual	Directions in the Notice were followed?
	Phone Fax E-mail Other			Yes No
	Phone Fax E-mail Other			Yes No
	Phone Fax E-mail Other			Yes No
	Phone Fax E-mail Other			Yes No
	Phone Fax E-mail Other			Yes No
	Phone Fax E-mail Other			Yes No
	Phone Fax E-mail Other			Yes No

RECORD OF RETURNED PRODUCT AND PRODUCT DISPOSITION

Company returning product	Product description (lot, condition)	Date returned product was received	Who received the product	Product disposition	FSIS contacted?

Date of last recall simulation:

_____

SAMPLE RECALL NOTIFICATION LETTER

[DATE]

[CUSTOMER FIRM NAME and ADDRESS] ATTN: [CONTACT PERSON NAME and

TITLE] Re: [RECALL OF TYPE OF PRODUCT]

Dear Sir or Madam:

This letter is to confirm our telephone conversation that [Company Name] is recalling the following product because [Specify Recall Reason]:

[Describe the product, including name, brand, code, package size and type, establishment number, etc.]

We request that you review your inventory records and segregate and hold the above product. If you have shipped any of this product, then we request that you contact your customers and ask them to retrieve the product and return it to you. Once you have retrieved all of the product, please contact us. We will arrange to have the product shipped to our facility. Please do not destroy the product. We will credit your account for any product returned.

We are undertaking this action in cooperation with the Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture. FSIS officials may contact you to confirm that you have received this notice and are cooperating in this action.

Your prompt action will greatly assist [Company Name] in this action. If you have any questions, please do not hesitate to contact [Company Recall Coordinator] at [Telephone Number].

Thank you for your cooperation. Sincerely,

[Company Official Name] and [Title]