

## Chat questions from 2.21.24

### **Is it mandatory to check the belt speed of cookers with stopwatch, As new automated cookers are sensor operated and EPIPT and Cabin temperature are enough to control cooking CCP**

Unfortunately, without specific details of what they are trying to do, I am only able to provide a generic answer. In addition, my answer is dependent upon whether you are referring to HACCP validation or field verification.

If you are referring to HACCP validation, the method of monitoring must be adequate to determine that the defined critical limit(s) has been met. If the facility is utilizing the food code cooking temperatures as the critical limit, then the End Point Internal Product Temperature (EPIPT) would likely be enough information. However, if the critical limit requires that the product be held at a specified internal temperature for a specific amount of time (e.g., utilizing the FSIS Appendix A cooking times and temperatures), then the method of monitoring should be adequate to measure both parameters.

If the question is referring to Field Verification, the answer is going to depend on what the validated HACCP plan says. When the plan is being verified, we are just making sure that they are following what is written in the plan. If the critical limit is dependent upon belt speed, then the belt speed should be measured. Hopefully, the HACCP plan will tell you how the critical limit is monitored. If the information is specific, then the critical limit should be monitored using the method detailed in the plan.

### **What is best practices for if HACCP plans need to be updated or are outdated? Should another plan letter be provided to an updated plan?**

In North Carolina, we do ask that a new plan be submitted and we do issue a new letter for changes to the plan. If it is a small change, like an addition of a location or change of equipment, we will sometimes handle that with an email and attach that email to the establishment file, especially if it doesn't impact the approval letter in any way. We just try to keep some sort of record of when we discussed changes or updates. The HACCP Plan should have version histories on it and have record of any changes made.

### **What specific ROP plastic bags should be used for sous vide?**

There are some bags that are designed for sous vide, but in general any ROP bag that is able to stand hot temperatures can be used. If there is a question, the operator can contact the manufacturer and ask about the temperature the bags were designed to be used for.

### **What about octopus?**

Octopus would be susceptible to botulism Type E and would be limited ROP only while frozen before, during and after packaging as stated in 3-502.12(C).

### **Several butchers have started to ROP fresh meat at point of sale at the customer's request- would this still require a HACCP plan? Some have claimed exemption 3 (Removed from its PACKAGE in the FOOD**

**ESTABLISHMENT within 48 hours after PACKAGING.) but the removal from package does not does not happen in the food establishment.**

North Carolina interpretation would not allow for that. The 48 hours has to be in the control of the establishment. Our HACCP plan in this case would focus on the labeling for the customer to understand the time/temperature requirements since there is not storage in the ROP package.

**For temperature requirements for ROP (storage), is this for food temp or air temp? Meaning, do we only check the ambient air temps or check food temps (wrapping food item around thermometer)**

Most data loggers/electronic monitoring thermometers do measure the air temperature, but product temperature being maintained below 41F is most important and should be monitored and used for making decisions on corrective actions.

**Is there a good resource (like a chart or a "cheat sheet") which lists the vital CCPs for different hazards?  
\*\*nothing located**

**Would NCDA be able to approve packaged ROP products?**

I need more information on this one.

**Are you able to share your written policy on revoking a HACCP plan?**

I don't have a written policy but have an example of a revocation letter I could share.

**Would refrigerated storage need to be a CCP in a HACCP Plan for packaged spicy tuna sushi rolls in a self-service display case?**

Depends on how the plan is written but probably not. HACCP Plan written for sushi is likely written for the acidification of rice. Once the rice has been acidified, it is no longer TCS so it does not have to be refrigerated. However, mixing it with other TCS ingredients, like spicy tuna into a roll, it now requires refrigeration again. At this point, you have taken the food from the HACCP plan and used it as an ingredient in another food, and should follow normal Food Code parameters, unless the HACCP Plan is written differently.