

## **AFDO ADVANCED INSPECTOR BOOT CAMP Q&A 1.16.2025**

### **What is it? A Food Safety Game – Questions - Corine Peplinski** [cpeplinski@peoriacounty.org](mailto:cpeplinski@peoriacounty.org)

Q: So if juice is treated with 5-log reduction, is the label required? or not?

A: The label is not required if the following is met: (A) Treated under a HACCP PLAN as specified in §8-201.14 to attain a 5-log reduction, which is equal to a 99.999% reduction, of the most resistant microorganism of public health significance.

Q: How do you find/use EPA register numbers to determine if it is approved?

A: The EPA registration number will be on the label. It may be small and hard to find. You can also look for wording like "Kills germs" or "Kills 99% of bacteria". Only EPA registered bleaches can contain that wording. You also want to read the instructions on the label. Some bleaches will be EPA registered but will say "Do not use on Food Contact Surfaces."

Q: Can you please touch on scented bleaches

A: I have never seen a scented bleach that is EPA registered with food contact surface label instructions.

Q: How about wooden, usually cedar, bagel boards with burlap straps?

A: I had to look these up because I have never seen one. It is literally a cedar board with burlap wrapped around it. I also do not know what the purpose of using one of these is versus another piece of baking equipment. I would not allow these as is. I don't think any part of it meets code. The burlap does not meet the requirements in Chapter 4 of the Food Code and cedar is not considered a hard wood. I do not know if there is a way to make them safer (like wrapping the makisu in plastic wrap). Perhaps pose that question back to the food establishment and see if they can come up with something.

Q: What makes kosher pickles kosher? would cucumbers be inherently kosher?

A: Cucumbers would be inherently Kosher since it is a naturally grown food. I do not know if the Kosher in Kosher Pickle is due to the fact that it is produced in Kosher approved conditions or whether it is a term that is used to describe other aspects of the pickle.

Q: If the package says "Sushi Grade," as shown in the photo, and the species is correct, would that be sufficient for parasite destruction records?

A: I am not sure if anyone regulates the term "Sushi Grade" on packaging, so I would also request other documentation such as the letter of guarantee or receipt from the supplier.

Q: What is "white fish" usually in sushi?

A: Escolar is sometimes misbranded as "white tuna".

## **AFDO ADVANCED INSPECTOR BOOT CAMP Q&A 1.16.2025**

Q: Regarding bleach, that was only for 3-compartment sink and sani-buckets for food contact surfaces?

A: It would be for sanitizing food contact surfaces. If they want to use a non-EPA registered bleach for floor cleaning, that is fine. I would just encourage them to train their employees that the bleaches are not the same so they don't use the wrong one.

Q: So would you say its more of a not properly sanitizing violation or not using toxic items correctly? We've been having on ongoing debate about it

A: I think you could write a scented bleach either way. Technically, you are not properly sanitizing because it's not an EPA registered bleach and does not have the appropriate usage instructions. However, the reason it does not have the EPA registration or usage instructions is because it contains chemicals which can not be used on food contact surfaces making it a toxic violation. I would just make it consistent among your staff, especially for data tracking.

### **Define, Identify and Evaluate HACCP –**

Tom Nerney [Thomas.Nerney@fda.hhs.gov](mailto:Thomas.Nerney@fda.hhs.gov)

Carrie Pohjola [Carrie.Pohjola@wisconsin.gov](mailto:Carrie.Pohjola@wisconsin.gov)

Tara Edwards [edwards@SNHD.ORG](mailto:edwards@SNHD.ORG)

### **Links shared by presenters within their presentations:**

<http://www.foodprotect.org/guides-documents/single-hazard-special-process-haccp-template-guidance-document-and-sample-templates/>

<https://www.fsis.usda.gov/news-events/events-meetings/revised-appendix-b-guidelines>

AFDO retail HACCP guide <https://www.afdo.org/wp-content/uploads/2024/01/The-HACCP-Guide-11.28.23.pdf>

Q: Do you know where I could find a template for this kind of HACCP plan? We see a lot of deer being processed.

A: <http://www.foodprotect.org/guides-documents/single-hazard-special-process-haccp-template-guidance-document-and-sample-templates/> plus the AFDO Special Processes manual will have some great guidance to work from.

Q: So custom deer for personal use only, not sold at retail, requires a HACCP and variance?

A: If it is done in a retail facility, that is correct, a variance and HACCP plan as specified under 3-502.11.

## **AFDO ADVANCED INSPECTOR BOOT CAMP Q&A 1.16.2025**

Q: Is a HACCP required for custom processing animals? Or just an approved plan with a variance?

A: A HACCP plan is required. The CCPs would be separation and cleaning/sanitizing

Q: What oxygen transfer rate is considered ROP?

A: There is no definition for ROP. Any time oxygen is removed it is considered ROP.

Q: How does the packaging material thickness affect oxygen transfer rate?

A: Last year (2023) during CFP, there was no consensus on oxygen transfer rate or packaging material for what would be considered ROP. There are many factors that have to be considered like if the food is oily and would seal up the pores. The only product that has been validated is the 10,000k OTR for fish and only fish. But this is not for any other food product.

Q: Don't we have to worry about C. bot in cook chill packaging?

A: Yes C. bot would be a hazard of concern the HACCP plan should address the control (e.g. cold holding)

Q: ROP HACCP plans and variances would still apply to food that is cooked, cooled, and then held frozen (not refrigerated) correct?

A: The answer to this depends on the process. For example, cooking food, bagging at 135F, then cooling and holding frozen could be done without a variance if they are following the code parameters.

Q: Frequently, uncooked bean sprouts are provided as a topping for 'pho' or Vietnamese soup. What should we as inspectors look for with these bean sprouts?

A: Are these bean sprouts that are purchased? If they are sprouting in the facility they sometimes are in little drawers or hydroponic setups.

Q: Is there an example or resource for bean sprout HACCP?

A: <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-standards-growing-harvesting-packing-and-holding-sprouts-human-consumption>

Q: Do bean sprouts need to say "ready to eat" on package, or is there another requirement?

A: There is no labeling requirement for bean sprouts.

## **AFDO ADVANCED INSPECTOR BOOT CAMP Q&A 1.16.2025**

Q: What is the relationship between sous vide process and altered cooking temperatures?

A: Must follow requirements provided in 3-401.11

Q: Cook-chill process and sealing the package question: is tying the bag in a knot considered as sealed?

A: You may want to check with your FDA specialist for an interpretation on this but a knot has not been historically been considered ROP

Q: Is the 4.2 pH for non-TCS?

A: Use the TCS Tables A and B depending on how it is packaged. If using Table B, the pH will need to be below 4.2 to be considered non-TCS.

Q: If cooking a raw chicken breast using sous vide, how do you know when the chicken reaches 165F?

A: There are several methods of monitoring. Most commonly, we see facilities using self-sealing foam tape ("sous vide tape") often sold as part of a sous vide temperature monitoring kit.

Q: To use vacuum packing with no HACCP or Variance, can you freeze within 48hrs?

A: No. It must be used within 48 hours.

Q: You stated that food must be immediately sous vide after being placed in ROP. By "immediate" would you say that within 4 hours from the time it's placed in ROP is "immediately?"

A: (Tom Nerney - Presenter) I would say as soon as a batch of food is prepared for cooking, definitely not to exceed 4 hours.

Q: Can the RA validate a HACCP plan or do you need a Process Authority to validate a HACCP plan?

A: An RA could validate the HACCP plan as long as the necessary science is provided. We typically only require PA if the science is not known/provided.

Q: Wouldn't REHEAT be a CCP as well?

A: They are following the food code for reheating. It would not need to be a separate CCP.

## **AFDO ADVANCED INSPECTOR BOOT CAMP Q&A 1.16.2025**

Q: In the last poll question asking if the HACCP with the flow chart that didn't include storage as a CCP could be approved: you said no because cold storage was not listed as a CCP however, in the previous flow chart example discussed, cold storage was not listed as a CCP-can you confirm for sure please-I would list it as a CCP so wondering about the discrepancy-thanks!

A: Cold holding would be a CCP

Q: Is reheating commercially manufactured cooked chili in its unopened ROP (Reduced Oxygen Packaging) bag, which then cooled down back to 41F while still unopened (cooled down due to overstock), considered a special process?

A: I do not believe this is a special process if the product remains in the package the entire time and the package is intact and intended for that particular use. They should monitor the cooling of the product to ensure it meets 135 F to 70 F in 2 hours and no more than 135 F to 41 F in a total of no more than 6 hours.

Q: What is the difference between hazards and risks?

A: (Speaker) I was using those two terms interchangeably. Hazard is the correct HACCP term.

Q: Facility breaks down large cuts of meat. Vacuum seals proportions of meat (steaks, chops, etc.). Then they are placed in a freezer until needed. Does it need a HACCP?

A: Yes. Vacuum packaging is a ROP process by definition. Either a Variance and HACCP plan are required in accordance with 3-502.11, or a HACCP plan is required with no Variance if 3-502.12 is followed exactly as written.

Q: Is there anything that needs to be evaluated differently in a plan review if ROP food is being frozen for later use?

A: Yes, you should be sure they have the space, a designated area, equipment meets Chapter 4 of the Food Code.

Q: Is continuous electronic temperature monitoring of a cooler required for any processes other than sous vide and ROP cook-chill?

A: The Food Code only requires for those two processes when conducted without a variance according to 3-502.12.

## **AFDO ADVANCED INSPECTOR BOOT CAMP Q&A 1.16.2025**

Q: Where can I find out more information about pink salts, nitrate, nitrites?

A: There is information about curing in the AFDO manual. <https://www.afdo.org/wp-content/uploads/2024/01/The-HACCP-Guide-11.28.23.pdf>

Q: I was under the assumption that there is a certain class the individual would need to take along with submitting ROP HACCP.

A: That will be based on individual jurisdictions, some are more stringent on training prior to implementation of a HACCP plan.