

Foreign Material Contamination in a HACCP Environment

Impact of Multi Component Products

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Multi-Component Products

- Products Containing:
 - Meats
 - Cheeses
 - Bread/Dough/Flour
 - Vegetables
 - Sauces/Gravies

Different Ingredients have different capabilities and specifications

- Fluid Industries (Milk, Oil, Flavors etc)
- Dry Ingredients (Powders, spices, sugar, salt, etc.)
- Particulate Ingredients (IQF Vegetables, Frozen Meat crumbles, etc.)

Certain Hazardous FMC will need to be controlled via a HACCP Plan

Certain Hazardous FMC that is
Not Likely to Occur does not need
to be part of the HACCP Plan

FMC EXAMPLES – Each Managed Differently

- Metal on Metal in Plants
 - Different Operations will Treat this Differently
- Flour Contamination
 - A single occurrence of significant magnitude but extremely low frequency
- Wood and Farm FMC in Vegetables
 - Vendor Selection and Improvements eliminate this from being a HAZARD
- Paper in Bacon Ends and Pieces
 - Raw material and Vendor Selection Minimize this QUALITY issue

So How do we determine if it belongs in the HACCP Plan?

- Is it a “HAZARD”?
- Is it “Likely to Occur”?
- Does it need to be controlled?

Is it a “HAZARD”?

- Addressed earlier today

Is it “Reasonably Likely to Occur”?

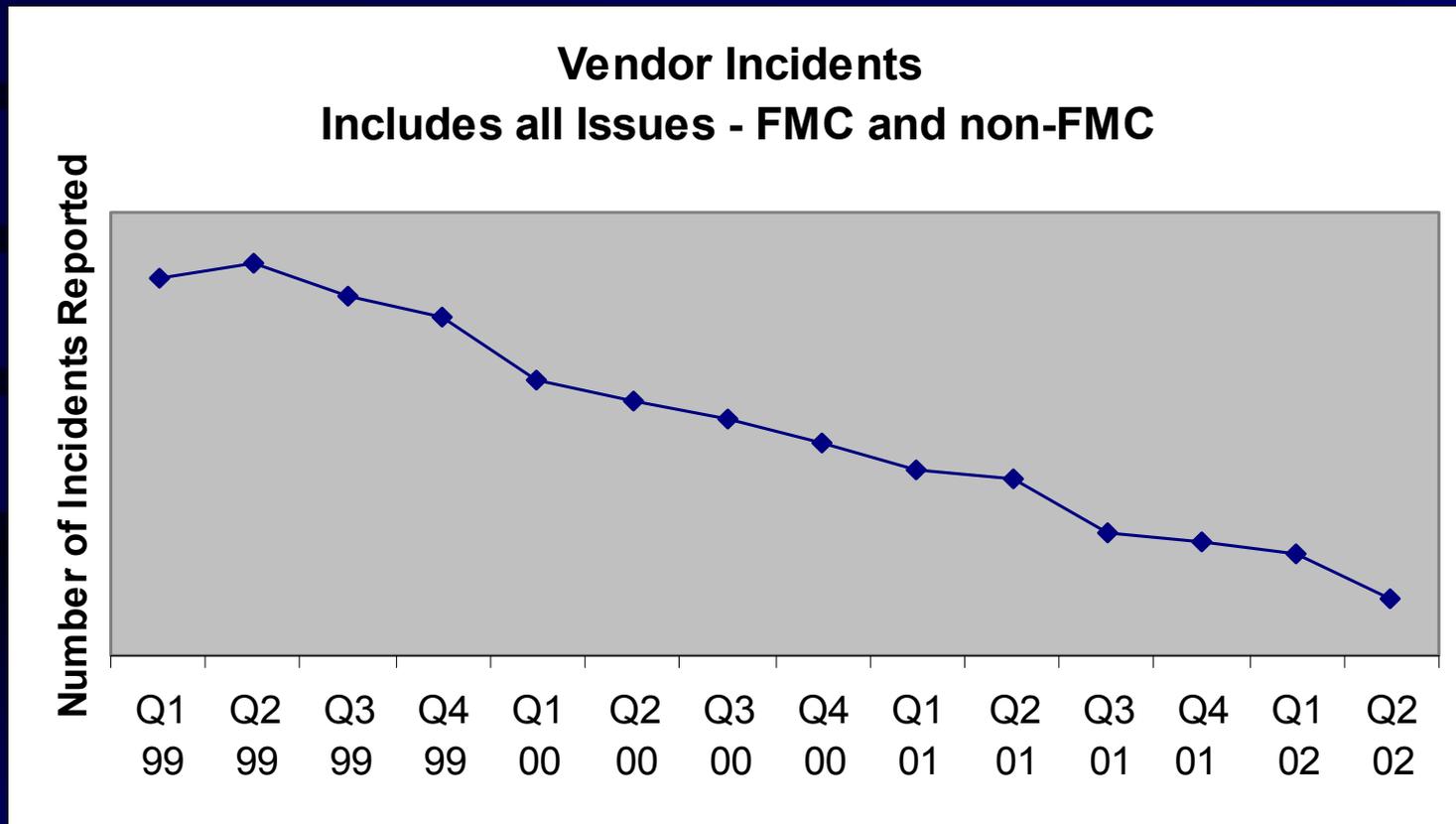
- Use of Sound Scientific Data
- Methods Vary by Ingredient to Determine Frequency
 - Fluid – Filters/Strainers/Magnets
 - Dry – Sifters/Screens/Magnets
 - Particulate – Visual/Magnets/Metal Detection

Data Collected and Used in Decision Making Documents is part of the HACCP plan

Farm to Fork Improvements

- Continuous Improvements are Driven to the Source of the Contamination, ultimately eliminating the HAZARD
- HACCP looks for a Single point of control to prevent the HAZARD.
- Both are Valuable Tools that need to be used together

Eliminate the Occurrence at the Source



Summary

- Any new Regulatory Directive and Guidance that is developed, needs to take into consideration:
 - Flexibility such that includes all segments of the Food Industry
 - Flexibility to use the most appropriate means to address FMC
 - Flexibility to address each manufacturers strengths