Hazard Analysis & Critical Control in Juice Processing

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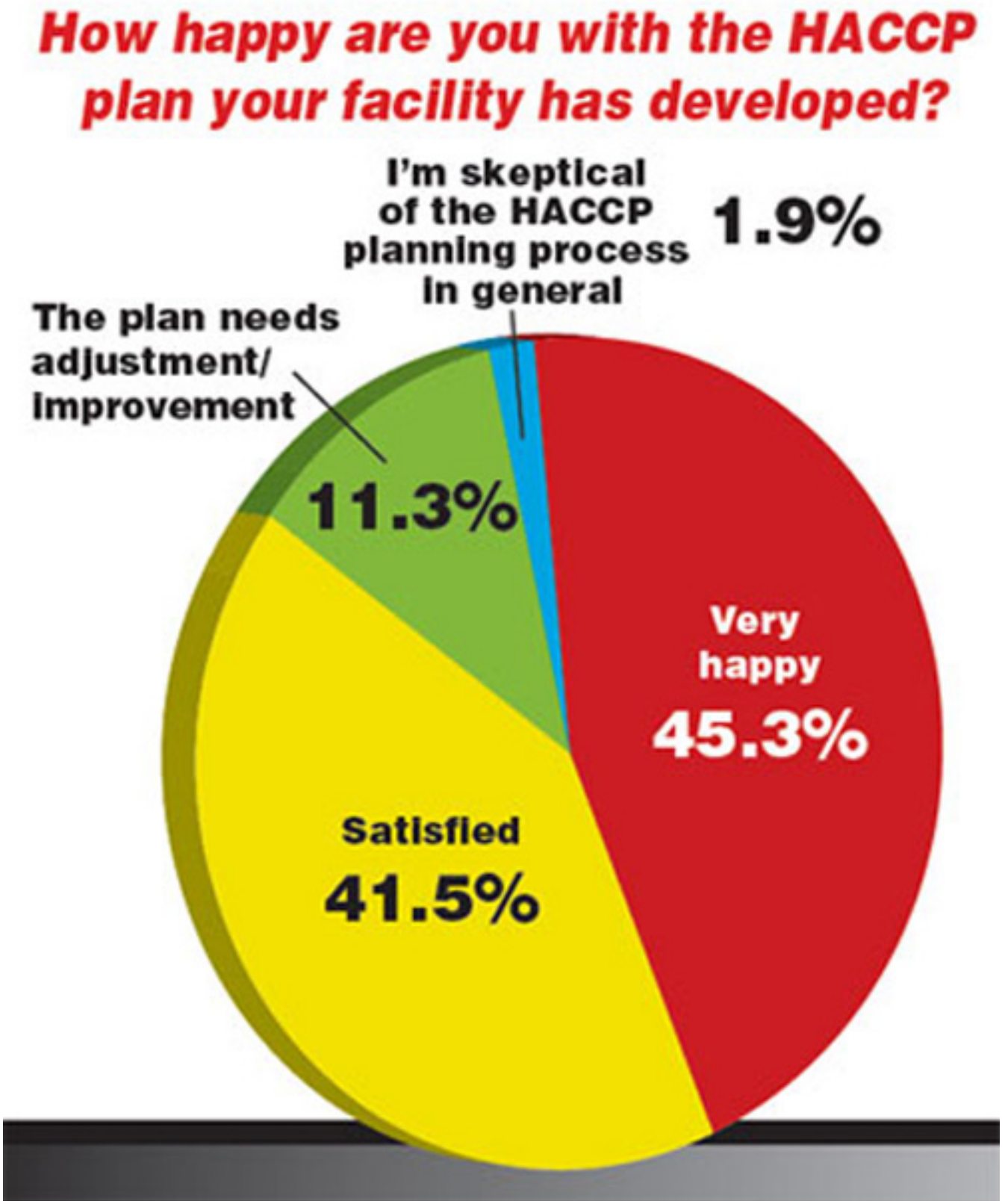
This survey on juice processing is the first targeted toward beverage suppliers since the Food Safety Modernization Act (FSMA) mandated hazard analysis and critical control (HACCP) planning across all industry segments last year. Juice, along with seafood, poultry and meat, however, remains one of only a few industry segments for which specific HACCP considerations are mandated by the FDA.

Food Manufacturing asked its beverage processing readers whether juice facilities with mandatory HACCP plans have better plans than those in less regulated facilities. Readers responded:

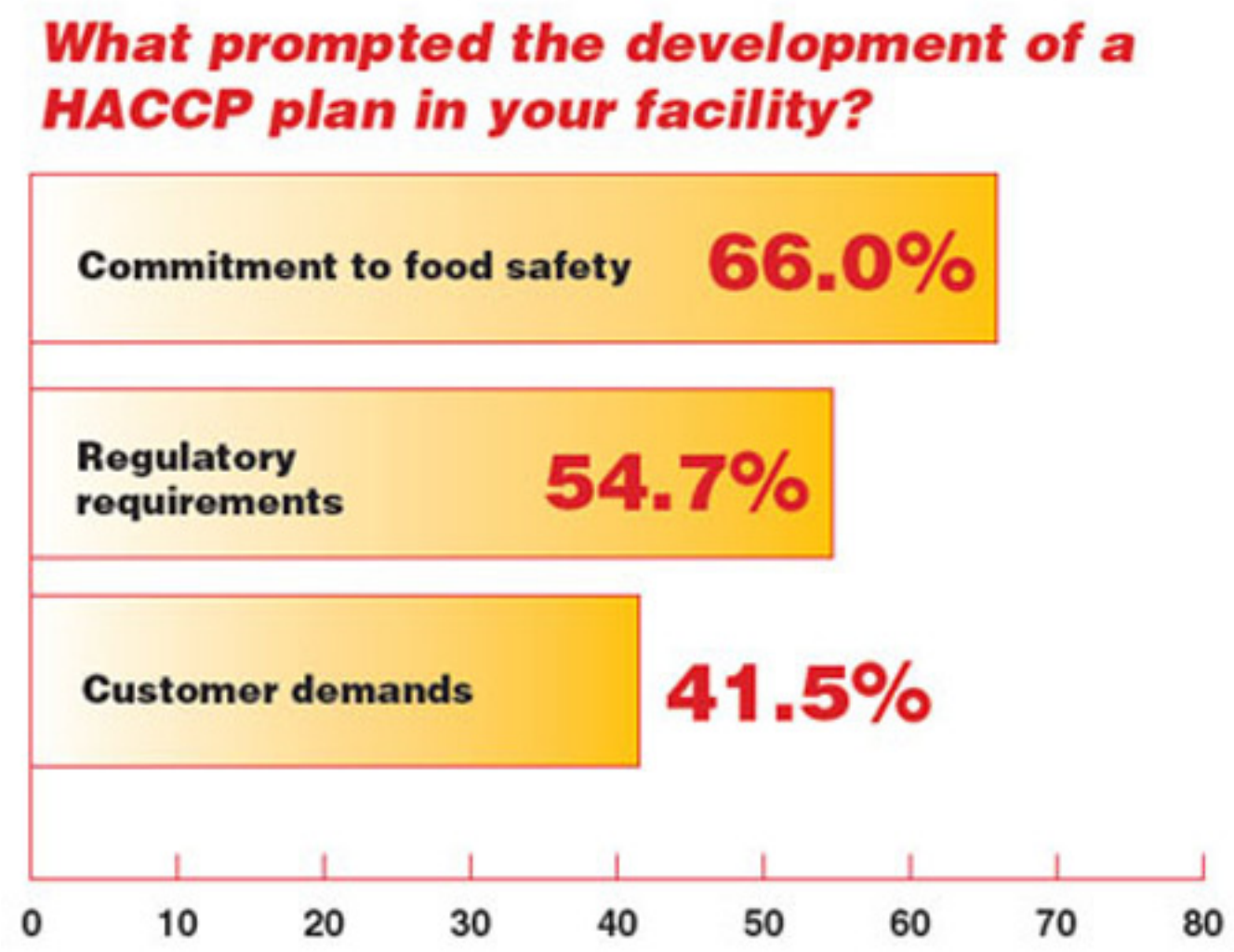
1. Meat, poultry, seafood and juice producers have better HACCP plans. — 54.1%
2. There is little difference between guided HACCP plans and non-guided plans. — 24.3%
3. Facilities that use plans not set by federal guidelines have better HACCP plans. — 21.6%

These results are noteworthy if not unexpected. Despite the industry's general resistance toward regulation, *Food Manufacturing*'s HACCP surveys have consistently revealed an overall satisfaction with HACCP planning policies and mandates. This attitude manifests again in the reader response to a subsequent question in this month's survey, in which readers were asked, "The Food Safety Modernization Act has made HACCP planning mandatory in all food manufacturing segments, not just juice, seafood, meat and poultry. Do you think this is an appropriate change?" Responses to this question remained fairly consistent with last year's figures, with 91.9 percent of readers reporting a belief that "all food segments should be required to write and implement HACCP plans" and only 5.4 percent of respondents believing that "HACCP planning should not be mandatory for any food industry segment."

When respondents were asked why they think juice is the only non-animal food product to have the distinction of mandated, industry-specific HACCP plans, one reader responded, "The microbiological considerations and toxins as a result of chemical contaminants (i.e. patulin, mycotoxins, etc.) for improperly handled/processed juice make HACCP a critical component to production [with] consumer safety in mind. There were several juice issues in the '90s that perpetuated this decision."



Last year, several readers pointed to the Odwalla and Sun Orchard juice recalls in the late 1990s — which many in the industry feel chipped away at public confidence in juice safety — as prompting FDA action in crafting juice-specific HACCP plans. As seen in the pie chart, satisfaction in the resultant plans is fairly high and is, in fact, up 13 percent over the results of last year's survey posing the same question.



This year, it appears as if juice processors are tweaking their HACCP planning procedures, likely in response to the FSMA. As displayed in the graph, juice processors report seeking guidance from various sources when crafting HACCP plans. The figures displayed here remain fairly consistent with last year's survey, with a few notable exceptions. "Suggestions from plant-floor staff" is down about 5 percent from last year, while "Consultation with equipment manufacturers" is up about 10 percent, "Advice from third-party regulators and government auditors" is up about 7 percent, and "The publicly available HACCP guidance published by the FDA" is up about 5 percent. These figures suggest a slight shift away from a "man on the ground" perspective in favor of guidance from professionals studied in food safety protocol.

Additionally, beverage manufacturers' reported HACCP planning schedules have shifted from last year's figures. While 12.5 percent of respondents last year reported updating HACCP documents semi-annually, this year none reported doing so. Those who consider HACCP plans a "living document" open to constant revision have dropped by over 10 percent, and the number of manufacturers performing annual audits has gone up. These numbers suggest that food manufacturers are opting for a more structured HACCP planning process.

Like other food industry segments, juice manufacturers are facing regulatory challenges by updating processes and increasing food safety protocol. By doing so, they aim to make the regulations work for them and for consumers, creating a safer food supply chain along the way.

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