

## **#8. THE IMPORTANCE OF HACCP IN RETAIL FOOD OPERATIONS**

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In this article, let's review the importance of retail HACCP.

The importance of HACCP begins with the understanding that if one opens a retail food establishment that serves food to consumers, one must know that the raw food coming from the wholesale system is normally contaminated with enough vegetative pathogens to cause a customer foodborne illness and put an operation out of business. Hence, the first responsibility of the owner of a retail food facility is to establish a prevention program to assure the reduction of hazards on incoming food to a safe level before serving to customers. The other main responsibility is to assure that all employees wash the fecal pathogens from their fingertips.

The government tells us that operators must have a license to operate and that they should read the FDA Food Code in order to know the process safety standards. The problem is that the regulators of the retail food industry are public health sanitarians who have had little, if any, formal education in food process safety, design, and validation. The only training most sanitarians receive before beginning to inspect restaurants is to "shadow" another inspector for a week as he/she does inspections. The people who should be doing inspections of the retail food system are food technologists, who understand the chemistry and microbiology of food, food engineering, sensory evaluation, etc., and are trained to certify food processes as controlled. Unfortunately, the allure for food technologists is to work for large food processing and manufacturing corporations and not for government retail food inspection.

If we are to assure safe food, we cannot use the FDA Food Code as a basis, because the code is not based on solid, referenced, food safety science. It is based on sanitation and the control of filth in a retail environment. Filth and dirt are simply not associated with food safety. The key to safe food is a process that has been scientifically validated to control the pathogens, chemicals, and physical hazards in the process to a safe level.

In 1972, at the first Conference for Food Protection in Denver, Colorado, scientists recognized that government regulations would always be outdated in terms of new technology that the retail food industry would need. The principles of HACCP—or the industry building systems that prevent food safety mistakes—form the only logical basis for future retail food operations. This was affirmed in 1985 by the National Research Council. During the 1990s, the government slowly implemented versions of HACCP. The USDA has done remarkably well in terms of recognizing that the owner of the food business is responsible for safety. As a result, the USDA has often stepped aside in most processing plants and demands that the owner of the business have an effective HACCP program and control the hazards in the processes.

The situation is entirely different in the retail food sector, where sanitarians trained in waste management, chemical hazard controls, and pest control systems, but not food process control, will audit retail food establishments once a year, for instance, for a few hours to ostensibly control safe food handling practices. They really should be auditing the ability of the manager to control the hazards. They are not even trained to make simple  $a_w$ , pH, Eh, and other critical verifications of process control. HACCP tells us that this type of inspection cannot assure that the operator has control. Every day, every meal coming out of the restaurant kitchen must be

safe. Otherwise, the operator and the business are in great jeopardy of being sued and closed. Eighty percent of the chicken is contaminated with *Campylobacter jejuni*, 15 percent with *Salmonella*, and 1 in 50 employees have high levels of pathogens in their fecal material. These pathogens must be reduced to a safe level in the food and on the fingers if the owner / operator intends to stay in business.

There is no initiative in the FDA or USDA to provide correct process control research. Because of the change to industry HACCP, it is the responsibility of the individual operator to assure control. It is up to the industry to establish hazards, critical levels, controls, monitoring, and verification as described in this series of articles. It is up to the operator to know the hazards and train employees to control the hazards.

Another serious problem is that the retail food industry has no research program. The various retail food associations are political lobbying entities. They have not focused on providing their members with new food process research information so that members can apply new technology (e.g., chilled food systems and sous vide) and encourage equipment manufacturers to make better, "goof-proof" cooking and washing equipment. Historically, they have lobbied for lower minimum wages, etc.

This series of articles, then, is to help quality control personnel in the retail food industry understand the need for a concerted, coordinated industry-wide retail food research and development program based on the principles of HACCP so that we can develop process standards for retail operations, and restaurants can safely produce virtually any menu item that they wish. Also, if challenged by a customer, they could prove that they were in control of the processes when that customer's food was produced, which means, there was no possibility that the food served to the customer caused a foodborne illness, and the customer's illness came from another source, such as home food preparation.

Next, we will continue the discussion of the policies manual and review the prerequisite programs of cleaning, maintenance, and pest control.