

Some retail food service establishments use Specialized Processing Methods in their operations. These processing methods may include smoking and curing of food, reduced oxygen packaging of food, and acidification of food. Under the *Health Regulations for Food Service Establishments*, retail food service establishments must apply for a variance and/or prepare and follow a Hazard Analysis and Critical Control Point (HACCP) plan before using these processing methods. Please use this guidance to submit an application to the Vermont Department of Health.

What is a variance?

The Department can authorize a change to or waiver of one or more requirements to the Regulations if it determines the change or waiver will not result in a health hazard or nuisance. This written authorization is called a variance.

What is a HACCP plan?

A HACCP plan is a written document that delineates the formal procedures for following the Hazard Analysis and Critical Control Point principles developed by The National Advisory Committee on Microbiological Criteria for Foods. HACCP is a systematic approach to the identification, evaluation, and control of food safety hazards based on the following seven principles:

- **Principle 1: Conduct a hazard analysis** – identify potential significant biological, chemical, or physical food safety hazards that are reasonably likely to cause illness or injury in the absence of control.
- **Principle 2: Determine the critical control points (CCPs)** – steps in the food process at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
- **Principle 3: Establish critical limits** – the maximum or minimum value to which a parameter must be controlled at each CCP to minimize the risk that the identified food safety hazard may occur.
- **Principle 4: Establish monitoring procedures** – measurements of the critical limits to ensure that the process is under control at each CCP.
- **Principle 5: Establish corrective actions** – predetermined procedures that are followed when monitoring indicates a deviation from an established critical limit.
- **Principle 6: Establish verification procedures** – ensure that the system is operating according to the HACCP plan.
- **Principle 7: Establish record-keeping and documentation procedures** – record and maintain information that documents the HACCP plan.

What needs to be included in a HACCP plan?

- (A) General information such as the name of the permit applicant or permit holder, the food establishment address, and contact information;
- (B) A categorization of the types of time/temperature control for safety foods (potentially hazardous foods) that are to be controlled under the HACCP plan;
- (C) A flow diagram or chart for each specific food or category type that identifies:
 - (1) Each step in the process; and

- (2) The steps that are critical control points;
- (D) The ingredients, recipes or formulations, materials and equipment used in the preparation of each specific food or category type and methods and procedural control measures that address the food safety concerns involved;
- (E) A critical control points summary for each specific food or category type that clearly identifies:
 - (1) Each critical control point,
 - (2) The significant hazards for each critical control point,
 - (3) The critical limits for each critical control point,
 - (4) The method and frequency for monitoring and controlling each critical control point by the designated food employee or the person in charge,
 - (5) Action to be taken by the designated food employee or person in charge if the critical limits for each critical control point are not met,
 - (6) The method and frequency for the person in charge to routinely verify that the food employee is following standard operating procedures and monitoring critical control points, and
 - (7) Records to be maintained by the person in charge to demonstrate that the HACCP plan is properly operated and managed;
- (F) Supporting documents such as:
 - (1) Food employee and supervisory training plan that addresses the food safety issues of concern;
 - (2) Copies of blank records forms that are necessary to implement the HACCP plan;
 - (3) Additional scientific data or other information, as required by the regulatory authority, supporting the determination that food safety is not compromised by the proposal.
- (G) Any other information required by the regulatory authority.

When is a variance and HACCP plan required?

What types of processes require a HACCP plan and NOT a variance?

Smoking food as a method of food preservation rather than as a method of flavor enhancement Curing food Using food additives or adding components such as vinegar: <ul style="list-style-type: none"> ○ As a method of food preservation rather than as a method of flavor enhancement, or ○ To render a food so that it is not time/temperature control for safety food (potentially hazardous food) 	Time/temperature control for safety food (potentially hazardous food) that is packaged using a reduced oxygen packaging method, is held at 41°F or less for more than 48 hours, and meets at least one of the following criteria: <ul style="list-style-type: none"> ○ Has a water activity (A_w) of 0.91 or less; ○ Has a pH of 4.6 or less; ○ Is a meat or poultry product cured at a food processing plant regulated by the USDA; or ○ Is a food with a high level of competing organisms, such as raw meat, raw poultry, or raw vegetables.
Packaging time/temperature control for safety food (potentially hazardous food) using a reduced oxygen packaging method except where the growth of and toxin formation by <i>Clostridium</i>	Fish that is frozen before, during, and after packaging using a reduced oxygen packaging method

<i>botulinum</i> and the growth of <i>Listeria monocytogenes</i> are controlled	
Operating a molluscan shellfish life-support system display tank used to store or display shellfish that are offered for human consumption	Food that is prepared and packaged using a cook-chill or sous vide method
Custom processing animals that are for personal use as food and not intended for sale or service in a food establishment	Specific cheeses that are packaged using a reduced oxygen packaging method
Sprouting seeds or beans	Juice packaged in a food establishment without a warning label
Preparing food by another method that is determined by the regulatory authority to require a variance	Unpackaged juice prepared in a food establishment serving a highly susceptible population

How does my establishment apply to use a Specialized Processing Method?

<p>For each Specialized Processing Method requiring a variance and HACCP plan, please submit:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Application <input type="checkbox"/> HACCP plan <input type="checkbox"/> Process authority review or scientific documentation supporting process safety 	<p>For each Specialized Processing Method requiring a HACCP plan only, please submit:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Application <input type="checkbox"/> HACCP plan
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- The application and associated documentation must be received at least 30 days before you plan to begin use of the Specialized Processing Method.
- A new application must be submitted for changes to an existing use or use of another Specialized Processing Method.
- Applications must be either typed or legibly printed in pen. Incomplete applications will be returned to you and will delay the process.
- After reviewing your completed application and associated documentation, we will contact you about approval or may request additional information.

Resources

You may need to consult with a process authority or food safety expert about your processing method:

Association of Food & Drug Officials

afdo.org/directories/fpa

Searchable list of food processing authorities

University of Maine Extension

extension.umaine.edu/food-health/food-safety

Cornell University Food Venture Center

cfvc.foodscience.cals.cornell.edu

Questions? Contact the Food and Lodging Program at 802-863-7221 or FoodLodging@vermont.gov.

Application for a Specialized Processing Method

Establishment Name (dba):

Full Legal Name of Ownership Entity:
 (Corporation, LLC, Partnership, Sole Proprietor)

Physical Address:

Mailing Address:

Person to contact regarding this Specialized Processing Method:

Contact Phone: Contact Email:

Food Product(s):

Submit one application for each Specialized Processing Method and for changes to an existing use of a Specialized Processing Method. Check the Specialized Processing Method you are applying for:

Variance and HACCP plan	HACCP plan only
Smoking food as a method of food preservation Curing food Using food additives or adding components to extend shelf life (ex. acidification, pickling) Packaging time/temperature control for safety food (potentially hazardous food) using a reduced oxygen packaging method without control of <i>Clostridium botulinum</i> and <i>Listeria monocytogenes</i> Operating a live molluscan shellfish storage or display tank Custom processing animals for personal use Sprouting seeds or beans Preparing food by another method that is determined to require a variance	Time/temperature control for safety food (potentially hazardous food) that is packaged using a reduced oxygen packaging method, is held at 41°F or less for more than 48 hours, and meets criteria Fish that is frozen before, during, and after packaging using a reduced oxygen packaging method Food that is prepared and packaged using a cook-chill or sous vide method Specific cheeses that are packaged using a reduced oxygen packaging method Juice packaged without a warning label Unpackaged juice serving a highly susceptible population
<p>For each processing method, please submit:</p> <input type="checkbox"/> Application <input type="checkbox"/> HACCP plan <input type="checkbox"/> Process authority review or scientific documentation supporting process safety	<p>For each processing method, please submit:</p> <input type="checkbox"/> Application <input type="checkbox"/> HACCP plan

Printed Name:

Title:

Signature of Applicant:

Date:

OFFICE USE ONLY		
Date Received		
Date Reviewed		
Scientific Documentation Supporting Process Safety Required	Yes	No
Specialized Processing Method Approval	Initials	Date