

Specialized Processes in Retail Food Establishments

HACCP AND VARIANCE

Specialized processes

Specialized processes are processes or procedures requiring specific food safety controls not otherwise addressed in the Minnesota food code. These techniques often require specialized equipment, ingredients or technology. Because of an increased potential health risk, specialized processes in retail food establishments must be conducted under strict operational procedures.

Specialized processes include:

- Reduced oxygen packaging (ROP) including:
 - Vacuum packaging time/temperature control for safety (TCS) food (e.g., cured meats, raw meat, raw poultry, raw vegetables, limited cheeses)
 - Cook-chill process
 - Sous vide process
 - Modified atmosphere packaging (MAP)
 - Controlled atmosphere packaging (CAP)
- Curing food (e.g., ham, bacon, summer sausage, salami, beef jerky/sticks, charcuterie).
- Smoking food for preservation, rather than for flavor enhancement (e.g., fish, meat and poultry).
- Custom processing of game animals.
- Using food additives or adding components, such as vinegar to preserve or render it a non-TCS food (e.g., sushi rice, sauerkraut, kimchi, yogurt, sausage).
- Operating a molluscan shellfish tank to store and display shellfish that are offered for human consumption.
- Sprouting seeds or beans.

- Preparing food any other way not described in the food code (e.g., using different cooking times and temperatures for raw animal foods, or drying fish, meat and poultry).

Specialized processes conducted in retail food establishments require a preapproved HACCP plan. Often, a variance is also required.

Juice

Producing juice is not identified as a specialized process in the Minnesota food code, but does require a HACCP plan in these circumstances:

- Producing unpackaged juice on premises for highly susceptible populations.
- Packaging juice in the food establishment, unless label requirements in Minnesota Rules, part 4626.0367 B are met.

HACCP plan

Hazard analysis and critical control point is a preventive approach to food safety. It identifies food safety hazards in the food production process and actions needed to reduce those hazards to a safe level.

“HACCP plan” means 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.

Seven principles of HACCP

1. Conduct a hazard analysis.
2. Determine the critical control points (CCPs).
3. Establish critical limits.
4. Establish monitoring procedures for critical control points.
5. Establish corrective actions.
6. Establish record-keeping and documentation procedures.
7. Establish verification procedures that HACCP is working.

Using these seven principles, the HACCP plan identifies and addresses critical control points (CCPs) where illness or injury is reasonably likely to occur in the absence of the hazard's control.

Annex 5 in the [FDA Food Code 2013](#) contains HACCP guidelines. Annex 6 contains food processing criteria.

Variance

Exceptions to specific parts of the Minnesota food code are granted on a case-by-case basis. If you plan on conducting specialized processes in your retail food establishment, submit a variance request to your regulatory authority. Your request must be supported by an approved HACCP plan and documentation showing the process can be done safely. Wait until your variance request is approved before beginning specialized processing.

A variance is not required for ROP if it is conducted according to specific parameters described in Minnesota Rules, part 4626.0420.

Resources

[FDA Food Code 2013 \(PDF\)](#)
(<https://www.fda.gov/media/87140/download>)