

Special Processes at Retail in Kentucky:

A Starter Guide



Kentucky Public Health

Prevent. Promote. Protect.

275 E Main Street, HS1C-F
Frankfort, KY 40621



Table of Contents



Retail Food operations, such as grocery stores and restaurants, generally sell product directly to the consumer and are engaged in less than 25% wholesale sales. Food Manufacturing operations should visit [The Kentucky Food Safety Branch’s Food Manufacturing webpage](#) for guidance.

*A **Retail Food** establishment conducting a food process that has a high risk of foodborne illness associated with it must meet additional requirements before beginning operation. The food establishment must have a **Hazard Analysis and Critical Control Points (HACCP) plan** and must obtain a **Kentucky Request for Variance**.*

Use this guide to learn more about the products, processes, and approvals required to meet these extra requirements.

HACCP Plan Overview	3
Intro to HACCP	3
Model HACCP Plans	3
Kentucky Requests for Variance	4
Processes Requiring a HACCP Plan	4
Reduced Oxygen Packaging (ROP)	4
Retail Sushi	4
Smoking for Preservation	5
Curing	5
Custom Processing of Animals for Personal Use	5
Growing Sprouts at Retail	5
Fermentation	5



HACCP Plan Overview

So, what is HACCP? In 1995, The National Advisory Committee on Microbiological Criteria for Foods convened to revise and simplify the definitions, trainings, and implementation strategies related to **Hazard Analysis and Critical Control Point (HACCP)** Plans. Read on below to learn more:



Intro to HACCP

HACCP is a management system in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement, and handling, to manufacturing, distribution, and consumption of the finished product.

Preventing problems from occurring is the paramount goal underlying any HACCP system. Seven basic principles are employed in the development of HACCP plans that meet the stated goal. These principles include **hazard analysis, identification of Critical Control Points (CCPs), establishing critical limits, establishing monitoring procedures, establishing corrective actions, establishing verification procedures, and establishing record-keeping and documentation procedures.**

Resources

Need to dig deep on HACCP basics? View the below resources for overviews of HACCP principles, definitions, history, and application:

[Basic HACCP Guidance | The University of Florida](#)

[Retail & Food Service HACCP | FDA](#)

[HACCP Principles & Application Guidelines | FDA](#)

[HACCP Laws and Guidance | AFDO](#)

[Regulator's Manual for HACCP | FDA](#)



Model HACCP Plans

A HACCP Plan is the written document which identifies food safety hazards in your process, as well as how you will control those inherent hazards. Use the links below to view model HACCP plans:

[Model HACCP Plan | AFDO](#)

[Sample HACCP Plan for Sous Vide | FSB](#)

[Sample HACCP Plan for ROP of Raw Meats & Poultry | FSB](#)

[Sample HACCP Plan for ROP of Cheese | FSB](#)

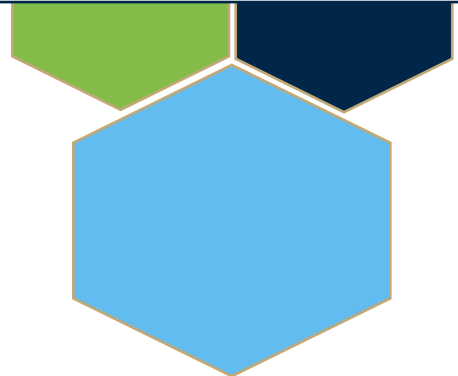


Kentucky Requests for Variance

Those wishing to undertake a Special Process at Retail should complete and submit a *Kentucky Request for Variance* to their [Local Health Department](#). The FSB then reviews these requests, including the HACCP Plans and other required documentation submitted for the specific Special Process. Once approved, the FSB issues documentation stating that the Special Processes are acceptable, and that the process is allowed to be conducted in the retail establishment.

Use the below link to view Kentucky's Request for Variance form:

[Kentucky Request for Variance](#)



Processes Requiring Variance & HACCP

There are several different processes which require submission of a Request for Variance, and use of a HACCP Plan. Read on in this section to learn more about these special processes and guidance for each:

Reduced Oxygen Packaging (ROP)

ROP of Potentially Hazardous/Time-Temperature Control for Safety (PHF/TCS) foods, as described in the U.S. Food and Drug Administration's 2013 FDA Retail Food Code, §3-502.11, requires a HACCP Plan. If Food Code, §3-502.11 is **not** being followed, a variance is also required.

ROP is a packaging method in which oxygen in the package is reduced to increase shelf-life or improve product quality. Examples of ROP include vacuum packing, cook/chill, sous vide, active and passive modified atmospheric packaging, and controlled atmosphere packaging, such as a packet placed in the package as an oxygen scavenger.

[Guidance for Reduced Oxygen Packaging \(ROP\) | FDA](#)

Retail Sushi

Sushi is a type of Japanese cuisine consisting of acidified rice, usually some sugar and salt, accompanied with a variety of ingredients, such as seafood, vegetables, raw fish, eggs, and occasionally tropical fruits. The sushi rice is generally kept at room temperature or in a warm holding unit for ideal taste. The primary pathogens with cooked rice are *Bacillus cereus* and *Staphylococcus aureus*. For information on variance and HACCP requirements for sushi, view the guidance linked below:

[Sushi HACCP Guidance](#)

Smoking for Preservation

Examples of smoking for preservation include smoked sausages or other meats.

[Smoking Foods at Retail for Preservation Industry Guidance](#)

Curing

Curing is adding salt, sugar, or nitrates for preservation, as with jerky. Click the below link to learn more about jerky requirements in Kentucky:

[Jerky at Retail Industry Guidance](#)

Custom Processing of Animals

This category covers food processed and NOT offered for sale or service in a food establishment, such as deer.

[Custom Animal Processing at Retail Industry Guidance](#)

Preparing Food by Another Method Determined to Require a HACCP Plan & Variance

Examples include fermented products such as sauerkraut, kimchi, some sausages, pickles/pickling, etc.

[Growing Sprouts at Retail Industry Guidance](#)
[Fermentation at Retail Industry Guidance](#)

Questions?

Have questions? Visit our [Retail Food website](#), contact the Kentucky Food Safety Branch via phone at (502) 564-7181, or email us at: food.safety@ky.gov

Need to submit a completed [Request for Variance form](#), or have questions for your Local Health Department? Click [here](#) for a complete listing of Health Department contacts across the state.

