scientific body or professional association) under the auspices of an industry-sponsored accreditation system, or a decision to require no accreditation for courses could be adopted. An outside source for accreditation could be created by the industry as is the case in thermal processing where a nationally recognized course is offered by industry. A scientific body or a professional association could serve such a function.

FSIS considered the implications of serving as an accrediting body for HACCP training courses. This option afforded three choices. First, the Agency could provide accreditation review of all available HACCP courses. This could be accomplished by contracting out the function. Second, the Agency could provide this service to the regulated industry through staff resources. This would require a significant diversion of Agency resources from regulatory activities to servicing the industry by approving a large volume of requests for review of HACCP courses. Third, FSIS could publish a periodic list of unacceptable HACCP courses based on the training received by HACCP-trained individuals in establishments with proven histories of poor performance. This would serve only to identify those courses the Agency determined through establishment performance to be inadequate preparation for a HACCPtrained individual.

To assure that training is timely, to reduce cost requirements for the Agency and industry, and to assure that a wide range of options is available to the industry, the Agency has tentatively concluded that the adequacy of courses for a HACCP-trained individual should be evaluated by each responsible establishment official. FSIS is not proposing to establish an accreditation process to evaluate training courses, because the Agency believes that its evaluation of the establishment's HACCP performance is the most resource-efficient means to reveal any training deficiencies or mistakes in the course selections made by the establishment. The Agency is soliciting comment on this approach and will consider other viable options for ensuring appropriate training of industry personnel.

## Implementation Schedule

Since mandatory HACCP was first considered by FSIS, the Agency has been considering the significant issues surrounding orderly implementation. Public discussions regarding phase-in have alternated between the need for caution in implementing so significant a change too quickly and a sense of urgency because of the food safety benefits associated with HACCP. The time frame for implementation in these proposed regulations attempts to balance these competing concerns. The first phase-in of a process begins 12 months from the publication of the final rule and ends at 36 months. This balanced phase-in approach will permit the regulated industry time to accomplish the training of personnel and adjust their activities to include necessary HACCP activities.

FSIS proposes to establish a timetable for phasing in HACCP based on industry production process categories. In identifying process categories for phasein of mandatory HACCP, the Agency has taken a number of factors into account. These include the knowledge of areas where controls similar to HACCP presently exist; consideration of all activities conducted by regulated establishments; consideration of the wide variety of products produced by the regulated industry that are difficult to sort into separate product categories; and the nature of changing and constant product development activities conducted by the industry. Also in keeping with the process control principles inherent in HACCP, FSIS has selected process as the basis for phase in, rather than product category. The Agency has identified process categories that appear to encompass all the processes of the regulated industry. They are:

01 Raw, Ground: This category includes ground red meat (beef, pork, sheep, etc.), ground poultry, all mechanically separated species, and mechanically deboned poultry.

02 Raw, Other: This category includes all red meat species and poultry classes not fully cooked including non-intact muscle products (shaped, formed, separated, etc.), all intact raw muscle products including processed (injected, coated, breaded, tenderized, etc.) and all cut, or boned product both bone-in and boneless.

03 Thermally Processed/ Commercially Sterile: Included in this category are retortable pouches and canned meat and poultry products.

04 All Other Shelf Stable, Not Heat Treated: This category includes all products that are shelf stable including dried, controlled by water activity, pH, dehydrated, freeze dried, fermented, and products that meet the requirement for a maximum pH of 4.6, for example freeze dried soup or meals, shelf stable salami, jerky, or dried beef.

05 Fully Cooked, Not Shelf Stable: This includes all keep refrigerated or frozen products including those that are sliced and packaged, and products prepared by central kitchens, for example cooked sausage, hams, frozen fully cooked beef patties, pizzas.

06 All Other Shelf Stable, Heat Treated Product: This includes rendered products, for example lard and oils.

07 All Non-Shelf Stable, Heat Treated, Not Fully Cooked Product: This category includes ready-to-cook poultry, cold smoked and products smoked as a trichinae treatment, partially cooked, battered, breaded, char-marked, batter set, and low temperature rendered products, for example partially cooked patties and nuggets, partially defatted beef, ready-to-cook barbecued chicken, mettwurst, etc.

08 Non-Shelf Stable, with Secondary Inhibitors: This includes products that are irradiated, fermented, salted, and brine treated, for example, oriental sausages, pressed duck, and irradiated poultry.

09 Slaughter: This includes all red meat species, all poultry classes, and all voluntarily inspected species and classes.

Special considerations for phasing HACCP into small establishments are discussed below.

The proposed effective dates for each category are expressed in relation to publication of a final HACCP regulation; the six month Hazard Analysis period is to precede the effective date for each process category.

In determining the phase-in sequence for these categories, four options were considered.

The first proposed phase-in option considered is based on the public health and safety risk inherent in the production process. Risk considerations dictate that raw ground product be in the initial implementation period, followed by slaughter since these processes result in products that have been shown to pose the greatest risk for foodborne illness. The process categories were then ranked according to the food safety process controls applied during the manufacturing process. This option would have phased-in Shelf Stable, Heat Treated and Thermally Processed/Commercially Sterile processes in the final groups. Those processes include areas in which significant interventions take place during production to assure product safety.

The second option considered the controls that currently exist in regulation mandating critical control points and critical limits related to health and safety. This method would have phased-in those processes where the greatest process control experience and regulatory standards exist for the earliest implementation dates. The