



Reduced Oxygen Packaging without a HACCP Plan



Reduced Oxygen Packaging (ROP) is commonly used in food establishments to create a tight seal around food by removing air from a plastic bag. ROP offers several benefits, including reducing freezer burn, portioning product, and prolonging shelf life. However, ROP can also create an environment favorable to the growth of harmful bacteria such as *Clostridium botulinum* and *Listeria monocytogenes*, turning a safe food into a potentially lethal one.

“ A HACCP Plan is not required when a Food Establishment uses ROP method to package Time/Temperature control for safety food that is always:

1. Labeled with the production time and date,
2. Held at 41°F or less during refrigerated storage, and
3. Removed from its package in the food establishment within 48 hours after packaging. AMC 16.60.140, CHAPTER 3-502.12(F)

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Foods that are reduced oxygen packaged by the food establishment that are kept in ROP longer than 48 hours must develop a Hazard Analysis and Critical Control Points (HACCP) plan and have it approved by the AHD Food Safety Program before conducting ROP in the food establishment. FOOD CODE, AMC 16.60.140, CHAPTER 3-502.12 be held at 41°F or less at all times for not more than 30 days and:

- Have a water activity of 0.91 or less; or
- Have a pH of 4.6 or less; or
- Be a cured meat from a USDA-regulated facility from an intact package; or
- Be a commercially manufactured cheese that meets certain standards of identity; or
- Have a high level of competing organisms, such as raw meat, raw poultry, or raw vegetables.

ROP for fish is stricter than other products because certain species of *C. botulinum* bacteria found in fish can grow at temperatures lower than customary commercial refrigeration. Fish must be frozen before, during, and after reduced oxygen packaging. An approved HACCP plan is also required prior to starting any ROP of fish.