

**VERMONT AGENCY OF AGRICULTURE FOOD & MARKETS
MEAT INSPECTION SERVICE**

POLICY# MI-001

Effective Date: 8-1-18

Specially Processed Meat and Poultry

**Including but not limited to: Smoked, Cured and Uncured Products, Refining of Livestock Fats,
Drying and Pickling**

I. **PURPOSE:** Curing is the addition of salt, sodium or potassium nitrate/nitrite sometimes sugar, seasonings, phosphate and curing accelerators to meat or poultry for preservation or development of flavor enhancement. There is a growing desire for local entrepreneurs to expand their market shares among consumers as well as growing demand for these specially processed products. Current Vermont regulations prohibit curing as a retail exempt activity. The purpose of this policy is to allow for retailers who wish to produce these kinds of products an opportunity to apply for a variance to do so.

II. **POLICY:** A “variance” is defined as a written document issued by the Agency that authorizes a modification or waiver of one or more requirements of the regulations. If in the opinion of the Agency, a health hazard will not result from employing the activities detailed within the modification or waiver a variance may be granted. The decision to grant or deny a variance request will be based on the best available science submitted by the applicant or sought out by the Agency at the time the decision is made.

III. **RATIONALE:** According to the Code of Vermont Regulations (CVR) curing is not an activity usually conducted at a retail store. Retail processors may be given the same opportunity as state or federally-regulated establishments to use innovative techniques in the production of safe foods. Retail establishments may apply to the regulatory authority for a variance to use a specific food safety performance standard for a product or a process in lieu of compliance with otherwise applicable specifications in the Vermont Regulations. However, to show compliance with the performance standard, the retail processor must, like a state or federally inspected establishment, show that processing controls are in place to ensure that the standard is being met. Thus, a request for a variance based on a federal performance standard must be supported by a validated food safety plan with record keeping and documented verification being made available to the regulatory authority.

Having a written food safety plan and a means to record the monitoring of specific safety parameters will give the inspection service the means to evaluate if the processes are being operated in a safe manner and the ability to remove the curing exemption if producers fail to meet the standards set forth in the food safety plans.

IV. **Reference: CVR 20-023-001 Section 303.1 C**