



Regulations for Specific Products

Selling Juice

Some farms are seeing opportunity in juice and juice products as a way to add value to their fruits and vegetables, allowing farms to expand into different marketplaces. Shelf- stable juices can be sold year-round. Bars, restaurants, and shoppers seeking new flavors or health-oriented products are all among potential customers for unique juice products.

Your licensing and marketing options depend on whether your juice is raw or treated. This fact sheet deals with 100% juice products and beverages that include juice as an ingredient such as juice added to sparkling water, teas, kombucha, etc.

Raw Juice

Raw juice and beverages containing raw juice may only be sold in a retail environment where the juice is provided directly to the customer, such as a farmers market, juice bar, or restaurant. It cannot be sold or distributed to other businesses. Raw juice cannot be sold wholesale in Washington State.

To sell raw juice, or a product containing raw juice, you must contact your county health department for specific permitting information. Specific requirements may vary from county to county.

Pasteurized and Treated Juice

If you would like to sell your juice product wholesale for example, to a local restaurant, bar, local grocery or co-op, or if you would like to sell and ship online, you need a WSDA Food Processor License.

If your product is 100% juice you must pasteurize or appropriately treat your juice and follow the FDA's rules for Juice **Hazard Analysis and Critical Control Point** (HACCP) regulation as part of your WSDA licensing. If you produce and sell a juice beverage that has juice or puree as an ingredient along with other ingredients, for example, sugar or water, the juice ingredient itself must be treated according to the same FDA Juice HACCP regulations.

TABLE 1. SUMMARY OF JUICE MARKETING OPTIONS AND LICENSING REQUIREMENTS

	Direct Retail	Wholesale	License/Permit Required
Raw Juice and Raw Juice Beverages	YES	NO	Local Health Jurisdiction Permit
Pasteurized Juice and Treated Juice Beverages	YES	YES	WSDA Food Processor License

Production of the final beverage product will need to follow FDA's Preventive Controls rules to obtain WSDA licensing. Large firms need to follow Preventive Controls rules now. Small firms will be required to do so starting by 2019. Under FDA's Preventive Controls rules, your juice beverage needs to be appropriately treated.

WSDA Juice Licensing for 100% juice and juice beverages is described below.

WSDA Food Processor License for Treated Juice

For general information on the WSDA Food Processor License, please see fact sheet 18, "WSDA Food Processor License and Facilities." Obtaining a WSDA Food Processor License for juice or a beverage containing juice involves meeting additional juice-specific requirements.

Juice Hazard Analysis and Critical Control Point (HACCP) Plan for 100% Juice

As part of obtaining a WSDA Food Processor License for juice, you will need to develop and follow a Juice HACCP Plan. The HACCP Plan is a preventive way of managing food safety that focuses on analyzing and controlling biological, chemical, and physical hazards to reduce them in advance, rather than reacting to them. In your HACCP Plan, you will identify key points in the process where a food hazard is reasonably likely to occur and apply measures to reduce or eliminate those food hazards.

The first step in creating a HACCP Plan is doing a Hazard Analysis to identify all the potential hazards in your production process. . This includes identifying the pertinent microorganisms, such as *E. coli* or *Salmonella*, that pose a risk in your product. When you conduct a Hazard Analysis, you assess the likelihood of each hazard happening, how severe the health consequences would be, and how you will address the hazard. Then you identify the critical points in your production process where you can control for the hazards.

Pasteurization and 5-Log Reduction

Juice HACCP regulation requires that pertinent microorganisms be controlled with a treatment that results in a "5-log reduction." This means that the number of the target microorganism present in the juice is 100,000 times smaller after the treatment than before. Essentially, this means juice

needs to be pasteurized. The regulation does allow the use of other treatment processes, such as UV radiation. No matter which treatment process you use, you must consistently demonstrate that your process results in a 5-log reduction in the pertinent pathogens for your juice. Pasteurization times and temperatures vary depending on the type of product, process, the target microorganism, and the pH for the product.

Juice HACCP Training

To develop and implement your specific Juice HACCP Plan you need to have HACCP training or equivalent on the job experience that gives you the knowledge to identify hazards and the appropriate critical controls for your specific product and process. You may choose to consult with an expert trained to evaluate the effectiveness of your process and control measures. A Juice HACCP expert can determine the pasteurization practices that will work for your particular juice product.

Washington State University (WSU) Food Processing Extension and Research offers trainings for food processors and resources for product and process development. Their food lab can also do pathogen testing. For information, visit www.foodprocessing.wsu.edu or contact Dr. Girish Ganjyal at girish.ganjyal@wsu.edu or (509) 335-5613.

Visit the WSDA Food Safety Program webpage www.agr.wa.gov/foodanimal/foodprocessors/haccp for resources to help with HACCP planning, including links to HACCP training opportunities.

Visit www.fda.gov/Food/GuidanceRegulation/HACCP/ for detailed information about Juice HACCP, including an example of a good juice HACCP plan.

Preventive Controls for Beverages Containing Juice

If your product is a beverage containing juice as an ingredient but is not 100% juice, your product falls under the Preventive Controls regulations. Juice ingredients will need to be processed according to Juice HACCP described above before they are added to your product. However, the final product may not need to be treated for a 5-log reduction. Instead, to obtain a WSDA Food Processor license you will need to develop an appropriate Food Safety Plan that identifies the preventive controls, such as heat treatment or acidification, that you will use to ensure your product is safe and “shelf stable.” You must show with valid scientific studies that the treatment process you are using will destroy the food borne microorganisms that cause illness or spoil food.

For training and resources to develop a food safety plan with preventive controls visit www.iit.edu/ifsh/alliance for information from the Food Safety Preventive Controls Alliance.

Resources

In addition to the resources listed above, visit the Northwest Food Processors Association at www.nwfpa.org for training and other resources for food processors.

Recommended Fact Sheets

- 4. Licensing
- 18. WSDA Food Processor License and Facilities
- 22. FAQ on the Food Safety Modernization Act (FSMA)

For further information, to provide comments, or suggest a resource to add to this fact sheet, please email smallfarms@agr.wa.gov or call (206) 256-6157.