

Commonly Asked Questions from Small and Very Small Plants on HACCP (3)

Q1: What are inspection program personnel responsible for regarding review of supporting documentation?

A1: Inspection program personnel have the responsibility to verify that there is documentation on file to support decisions made in the hazard analysis and HACCP plan. If inspection program personnel have questions related to the supporting documents, they should contact the Frontline Supervisor or the Technical Service Center for assistance. The District Office may assign an EIAO to assess the documentation.

Q2: Should a NR be issued if the FSIS generic HACCP model was used for developing the HACCP plan?

A2: No, a NR should be issued when there is regulatory noncompliance. The generic HACCP models are intended to be used as guidance documents. A generic HACCP model may be used by an establishment to assist it in developing its HACCP plan. The important question is whether the resultant plan meets all of the applicable regulatory requirements in 9 CFR Part 417.

Q3: How is “step” defined as it relates to the flow chart?

A3: A “step” is an operation within the production process that is essential to the production of the finished product. The establishment is responsible for identifying the steps that exist in its operation and is to consider whether there are any biological, chemical, or physical food safety hazards associated with each of the steps in its production process.[417.2(a)(2)]

Q4: Are metal detectors required to be a critical control point (CCP)?

A4: No. The presence of a metal detector does not automatically require that it be designated as a CCP. However, if the hazard analysis determines that metal is a food safety hazard reasonably likely to occur, 9 CFR 417.2(c)(2) requires that the HACCP plan include at least one CCP to control it, and thus the metal detector may be a CCP. If the establishment can support that metal is not a food safety hazard reasonably likely to occur, there is no requirement for the metal detector to be a CCP. If inspection personnel have questions regarding the supporting documentation, they should contact the Frontline Supervisor or the Technical Service Center for assistance. The District Office may assign an EIAO to assess the documentation.

Q5: Is product thawing considered to be a step in the process? If product thawing occurs in an official establishment, is it required to be a CCP?

A5: If an official establishment is thawing product, it should be considered as a step in the process and evaluated as part of the hazard analysis. If, as part of the hazard analysis,

a food safety hazard is determined to be reasonably likely to occur with product thawing, 9 CFR 417.2(c)(2) requires the HACCP to include a CCP somewhere in the process.