

# Perspectives on Controlling FMC Through HACCP

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# HACCP



Physical food safety hazards that are identified as reasonably likely to occur for a particular product and/or process should be controlled in a HACCP system.

# Reasonably Likely to Occur



“...one for which a prudent establishment would establish controls because it historically has occurred, or because there is a reasonable possibility that it will occur in the particular type of product being processed, in the absence of those controls.”

(Pathogen Reduction Final Rule, 1996)

# Example Hazard Analysis



Process Step	Potential Physical Food Safety Hazard	Is it reasonably likely to occur?	Justification for Decision	Control Measures for reasonably likely to occur food safety hazard.	Is this step a CCP?
Receiving Raw Materials	Metal, glass, wood, plastic, paper, cardboard	Yes	Plant has previously found metal in raw materials.	Metal detector at later step is the CCP.	No
Grinding	Metal	Yes	Grinding process may cause metal to be in the product.	Metal detector at later step is the CCP.	No

# NACMCF, Hazard Analysis



To develop a list of hazards which are of such significance that they are reasonably likely to cause injury or illness if not effectively controlled. The Guidelines provide that each identified potential hazard should be evaluated, giving consideration to its severity and likely occurrence

# Example Hazard Analysis



Process Step	Potential Physical Food Safety Hazard	Is it a significant food safety hazard?	Justification for Decision	Control Measures for reasonably likely to occur food safety hazard.	Is this step a CCP?
Receiving Raw Materials	Metal, glass, wood, plastic, paper, cardboard	No	Plant has previously found foreign material contaminates in raw materials, but these are not food safety hazards and are not likely to occur in the process.		No

# Example cont.

Process Step	Potential Physical Food Safety Hazard	Is it a significant food safety hazard?	Justification for Decision	Control Measures for reasonably likely to occur food safety hazard.	Is this step a CCP?
Grinding	Metal	No	The plant has a preventive maintenance program in place to check equipment. Plus, the possibility of having metal fragments of sufficient size and shape that would cause injury to a consumer following grinding is extremely low.		No

# Hazard Analysis



- Must be specific for the product/process.
- Should identify all potential hazards for each step of the process, including all ingredients and packaging materials.
- Should be conducted after all pre-requisite programs are designed and implemented.
- Should identify the true food safety hazards and identify the critical points for control.

# Approach to Control



- Each establishment must identify the point or points in the process where they can best control the identified hazard.
- These activities may vary greatly from one plant to another.
- Detection limits of equipment may vary.
- All critical control points should be supported by science and validated for adequacy in controlling the identified hazard.

# Summary



- HACCP is the best place to control food safety hazards that are likely to occur.
- Every HACCP plan can be different and still be effective.
- The industry and the agency must both allow flexibility in designing the optimal HACCP system to control physical food safety hazards.