HACCP Plan
Review of Regulatory Requirements

EIAO Training
Objectives

Upon completion of this module, you will be able to:

• List the seven regulatory requirements for the HACCP plan found in 9 CFR 417.2(c).
• Describe the significance of each of these requirements.
HACCP Plan – 9 CFR 417.2

- 417.2(a) Hazard Analysis
- 417.2(b) HACCP Plan
- 417.2(c) Contents of the HACCP Plan
- 417.2(d) Signing/Dating the HACCP Plan
- 417.2(e) Noncompliance may render products “adulterated” under the statutes
HACCP Plan – 9 CFR 417.2

- 417.2(b)(1)
  - HACCP plan developed and implemented
    - Covering each product when hazard analysis reveals food safety hazard RLTO in that process
HACCP Plan – 9 CFR 417.2

• 417.2(b)(2) Single HACCP Plan
  • Multiple products may be produced under a single HACCP plan
    • If hazards, CCPs, CLs, and procedures are essentially the same
    • If there are unique features of a product those must be specified
Establishments may develop a single HACCP plan for a single product that passes through multiple processing categories.

Example: Poultry
Key Point

- The EIAO should not focus on the number of HACCP plans but on whether all food safety hazards have been appropriately addressed for the processes being performed.
HACCP Plan – 9 CFR 417.2

- 417.2(b)(3)
  - HACCP plans for thermally processed/commercially sterile products do not have to address microbiological hazards, if
  - Product is produced in accordance with all parts of 318.300-309 or 381.300-309 (canning regulations)
  - Must still consider physical and chemical hazards
HACCP Plan – 9 CFR 417.2

- 417.2(c)(1)(2) Contents of HACCP Plan
  - Must list the food safety hazards identified in the hazard analysis
  - CCPs for controlling the identified hazard(s).
  - If a food safety hazard is identified as being reasonably likely to occur, must address it with a critical control point
HACCP Plan – 9 CFR 417.2

- 417.2(c)(3) List Critical Limits for CCPs
  - Designed to ensure meeting any applicable FSIS performance standards
    - No visible feces on poultry carcasses
    - Temperature that meets 6.5 log reduction for Salmonella in RTE meat products
    - No visible SRM's in raw beef products
HACCP Plan – 9 CFR 417.2

- 417.2(c)(4) HACCP plan for each CCP provides:
  - Monitoring procedures
  - Frequency performed
HACCP Plan – 9 CFR 417.2

• 417.2(c)(5) Corrective Actions

  • HACCP plan must describe corrective actions to be taken when there is a deviation from a CL at a CCP
    • Usually simply refer to “meeting 9 CFR 417.3”
HACCP Plan – 9 CFR 417.2

- 417.2(c)(6) Recordkeeping System
  - HACCP plan must provide for a recordkeeping system sufficient to document monitoring
  - Records of monitoring must include actual values
HACCP Plan – 9 CFR 417.2

- 417.2(c)(7) Verification Procedures
  - HACCP plan must list the verification procedures and the frequency of those procedures
  - Procedures as required in 417.4 and any others the establishment elects to include
HACCP Plan – 9 CFR 417.2

- 417.2(d) HACCP plan must be signed and dated by responsible establishment person
  - Upon initial acceptance
  - Upon any modification
  - At least yearly coinciding with annual reassessment
HACCP Plan – 9 CFR 417.2

- 417.2(e) Failure to develop / implement
- Failure to develop and implement HACCP plan that meets the requirements may result in product being “adulterated” according to the statutes
QUESTIONS?
HACCP Plan Workshop

• When is a HACCP plan required?
  • Include the regulatory citation

• What are the required features?
  • Include the regulatory citation

• Report out