

HACCP Plan

Review of Regulatory Requirements

EIAO Training



Objectives

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

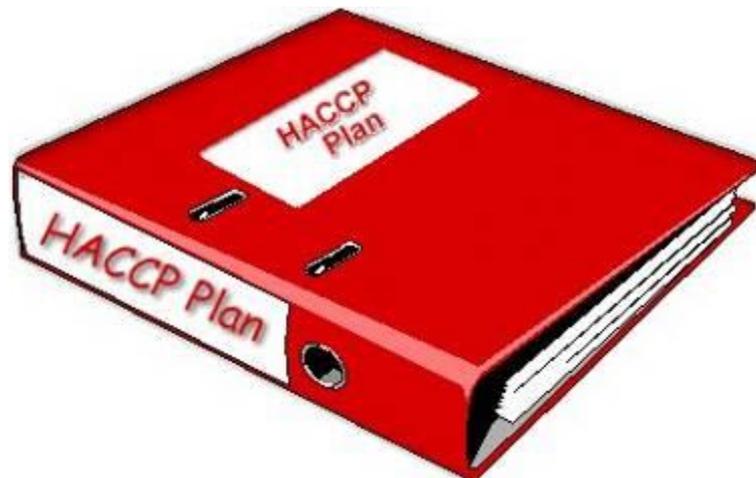
- List the seven regulatory requirements for the HACCP plan found in 9 CFR 417.2(c).
- Describe the significance of each of these requirements.

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

Federal Register Notice

- Establishments may develop a single HACCP plan for a single product that passes through multiple processing categories.
 - Example: Poultry

Slaughter → Debone → Cutup

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

