# Verification and Reassessment of the HACCP Plan

#### **EIAO Training**



#### Objectives

#### You should be able to:

- Define verification and reassessment
- Describe how to verify the verification requirement
- Describe how to verify the reassessment requirement

 The term "Verification" can be confusing because it is used for different activities depending upon the context.





- Verification (Usage 1)
  - One of the seven HACCP Principles
  - Broad meaning of the term
    - Activities other than monitoring that determine the HACCP system is functioning as intended
  - This encompasses:
    - Initial Validation
    - Ongoing Verification
    - Reassessment

- Ongoing Verification (Usage 2)
  - More narrow term
  - Specific activities that occur on an ongoing basis to ensure that the HACCP plan is being followed
  - Examples
    - Sampling
    - Calibration
    - Direct observation of monitoring
    - Records review

- Verification by USDA (Usage 3)
  - Procedures FSIS employees use to determine if regulatory requirements are met





#### Requirements - 9 CFR 417.4

- Validation: Demonstrates that the HACCP system can and does work as intended under plant conditions.
- On-going verification: Demonstrates that the establishment continues to produce safe, unadulterated products.
- Reassessment: Response to situations that may affect the effectiveness of the HACCP system or the establishment's ability to carry it out.

#### Validation vs. Verification

 Validation: demonstrates the HACCP system as designed can adequately control hazards to produce a safe, unadulterated product.

 Verification: ongoing activities to demonstrate conformance to the HACCP system

# Ongoing Verification Requirements

# Regulations

• 9CFR 417.2(c)(7)

• 9CFR 417.4(a)(2)(i)(ii)(iii)



Does the HACCP plan contain:

 Procedures and frequencies for calibration of process-monitoring instruments?

 Procedures and frequencies for direct observation of monitoring activities and corrective actions?

Does the HACCP plan list:

 Procedures and frequencies for the review of records generated and maintained in accordance with 9 CFR 417.5(a)(3)?

Product sampling as a verification activity?

 Are process-monitoring instrument calibration activities conducted as per the HACCP plan?

 Are direct observation verification activities conducted as per the HACCP plan?

 Are records generated in accordance with 9 CFR 417.5(a)(3) being reviewed by the establishment?

#### Reviewing HACCP Plan

 Are procedures and frequencies for all 3 activities included?

- Calibration
- Direct observation
- Records review



Sample HACCP Plan			
CCP Name	Step	Verification Activity	Question The Support
CCP 1	Cook	Calibration	DO RR
CCP 2	Chill	Direct Observation	Calibration RR
CCP 3	MD Packaging	Record Review	Calibration DO

# Reviewing HACCP Plan

 Calibrating monitoring equipment, direct observations, and records reviews do not have to all be addressed at each CCP, but all 3 should be addressed in the plan

# Reviewing HACCP Plan

Some HACCP plans might not contain all 3 activities

 Example - CCP monitored without process monitoring equipment

Example - Continuous monitoring equipment

# Reviewing Verification Records

 Are verification procedures performed at the frequency described in HACCP plan?



# Product sampling

 If product sampling is included in verification activities

- Observe employee take sample
- Review results



# Knowledge Check

 What are the three types of on going verification activities listed in the regulations?



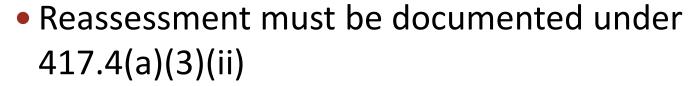
# Reassessment Requirement

#### Reassessment of the HACCP Plan

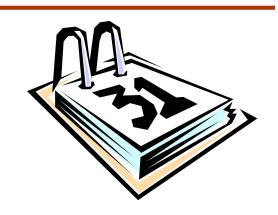
- Annual Requirement
- Process Change
  - 417.4(a)(3)(i)(ii)
- Establishment Training
  - 417.7

#### Reassessment of the HACCP Plan

- Annual requirement
  - Reassess annually
  - HACCP plan signed and dated
    - 417.2(d)(iii)



- If changes made must document the reason
  - If no changes on annual reassessment no need to document



# Training Requirement

- 417.7
  - HACCP trained person involved in development and reassessments
  - No documentation required to verify



#### Reassessment Due to Process Changes

- Reassessment is required for changes that could alter the hazard analysis
- If plan no longer meets regulatory requirements modify immediately
- Required to document reassessment under 417.4(a)(3)(ii) and document the reason for changing or for not changing

# Possible Process Changes

- raw materials or source of raw materials
- product formulation
- slaughter or processing methods or systems
- production volume

- packaging
- distribution systems
- intended use or consumers
- personnel

 Did the establishment perform the annual reassessment of its plan or plans at some point during the previous calendar year?

 Did the establishment consider any significant developments that have occurred in the plant in its analysis?

- Has a change occurred that could affect the hazard analysis or HACCP plan?
- Did the establishment reassess?

 If the reassessment revealed that the HACCP plan no longer met regulatory requirements, was the HACCP plan modified immediately?

- Did the establishment sign and date the plan during the previous calendar year and upon any modification to the plan?
- Has the individual who reassessed the HACCP plan or who modified the plan, completed training in the 7 HACCP principles including a segment on HACCP plan development and review of records?

#### **Assess Information**

- To obtain answers, review
  - Reassessment records
  - HACCP plan



# QUESTIONS?

