

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

Terminology

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

Verification



Terminology

- 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

Terminology

- 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

Terminology

- 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)



Gather Information

- 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?

Gather Information

- 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?

Gather Information

- 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)
 - Reassessment must be documented under 417.4(a)(3)(ii)
 - 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

Gather Information

- 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?

Gather Information

- 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?

Gather Information

- 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?

