

## Student Handout- Module Number Twenty-One (21) - Canning HAV and HACCP Plan Verification

# Canning HAV and HACCP Plan Verification

All establishments must conduct a Hazard Analysis (HA).

Some establishments may decide microbial hazards in thermally processed products are RLTO and address them in a HACCP plan.

Other establishments may choose to use the regulatory exemption (in the slide) and omit microbial hazards from HACCP plan. In this case the decision in the HA is that microbial hazards are NRLTO because the product is produced in accordance with the canning regulations. The ongoing support for this decision is that the product is produced in compliance with the canning regulations. So, compliance with the canning regulations is a prerequisite for the decision in the HA.

When operating under the exemption, failure to meet any canning regulation is noncompliance with 417.5(a)(1) and all noncompliances with canning regulations are to be associated. When there are repetitive noncompliances or a failure to prevent microbial hazards, the establishment does not have support for the decision in the HA that microbial hazards are NRLTO.

Notice that this exemption only applies to microbial hazards. Any chemical or physical hazards deemed RLTO during the HA must be addressed in the HACCP plan.

IPP will conduct the HAV task per Directive 5000.6 Revision 1

Because compliance with the regulations is prerequisite for products under the exemption, IPP are to verify compliance with all canning regulations during the HAV task. To do this, they will review records and make observations. In the absence of existing documentation supporting compliance, IPP must gather additional information. For example, if a canning regulation has not been verified recently enough to determine compliance, IPP must verify that regulation. Once the additional information has been gathered, IPP will assess the information, and determine whether it provides overall support for the decision in the HA that microbial hazards are NRLTO. ...READ BULLET 3.

Concerns about the adequacy of the food safety system should be discussed with Supervisor. An EIAO may be assigned to conduct an FSA.

The HACCP Verification task is performed the same way for products produced under the exemption (ie not under a HACCP plan but through compliance with the canning regs).

Expectation: Verify all canning regulations at least once during the year. If no changes, 311 Recall and 310 Training would probably be done only once. Other regs could be verified much more often depending on the situation. Focus on regs with greatest potential public health impact.

If on patrol, may not have time to do more than one requirement before going to other plants. Have a tracking system for regulations verified-could use Inspector Notes in PHIS.

Specifications, procedures, and criteria for venting and IT must be met.

Process times and temps are typical CLs at retort CCP. Time-temperature data is obtained from monitoring the CCP. Other canning regulations can be verified during processing such as simultaneous readings of the MIG and the chart temps.

All canning regulations must be met in HACCP facilities. Many other regulations must be verified-recall plan, training, container closure examinations, posting processes, annual audits, etc.

EIAOs have critical roles in canning establishments. They perform in-depth food safety assessments to determine the adequacy of the plant's food safety system especially in response to illness outbreaks or spoilage incidents.