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.
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
<table>
<thead>
<tr>
<th>CCP Name</th>
<th>Step</th>
<th>Verification Activity</th>
<th>Question The Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>CCP 1</td>
<td>Cook</td>
<td>Calibration</td>
<td>DO RR</td>
</tr>
<tr>
<td>CCP 2</td>
<td>Chill</td>
<td>Direct Observation</td>
<td>Calibration RR</td>
</tr>
<tr>
<td>CCP 3</td>
<td>MD Packaging</td>
<td>Record Review</td>
<td>Calibration DO</td>
</tr>
</tbody>
</table>
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 ongoing 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?