

HACCP Plan

Monitoring and Corrective Actions

EIAO Training



Objectives

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

- Describe the purpose of monitoring.
- List the possible implications for not following the monitoring procedure.
- List the implications for not having support for the monitoring procedure.

Regulations

- 9 CFR 417.2 (c) (4)- Monitoring
 - List the procedures and frequency that will be used to monitor CCPs
- 9 CFR 417.2 (c) (5) – Corrective Actions
 - Include all corrective actions to be followed in response to a deviation from a critical limit

Monitoring

Monitoring

- Monitoring is a planned sequence of observations or measurements taken to assess whether a CCP is under control, and produce an accurate record for future verification. (NACMCF)

Gather Information

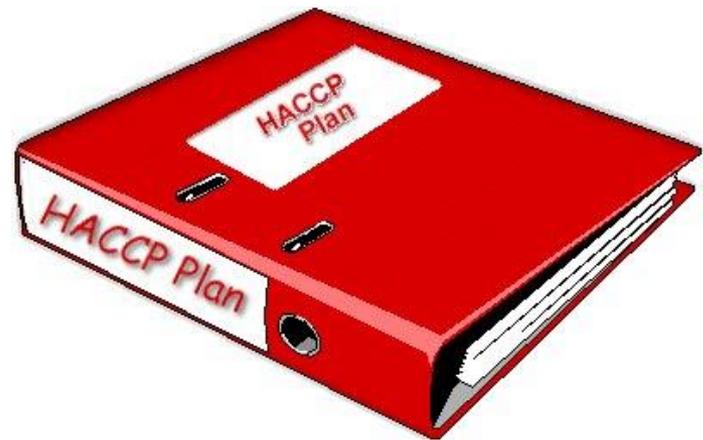
- Does the HACCP plan list the monitoring procedures & frequencies that are used to monitor each of the CCPs to ensure compliance with CL?
 - Design
- Are the monitoring procedures being performed as described in the HACCP plan?
 - Implementation

Gather Information

- Are the monitoring procedures being performed at the frequencies for the CCP listed in the plan?
 - Implementation
- Are the Critical Limits met?
 - Implementation

Reviewing HACCP Plan

- Monitoring procedures & frequencies are described in the HACCP plan
- You should be able to visualize what is occurring at the CCP



Reviewing Monitoring Records

- Frequency of procedures carried out as described in HACCP plan



Observing Plant Employees

- Performing monitoring procedures as described in HACCP plan



Taking Measurements

- Take independent measurements and compare to establishment results
 - Inplant Inspection personnel mainly



Knowledge Check

- What 4 questions will you be seeking answers to when verifying the monitoring requirement?



Monitoring Workshop I



- What is the purpose of monitoring?
- What are the possible implications for not following the monitoring procedure?
- What are the possible implications for not having support for the monitoring procedure or frequency?
- Give the regulatory statutory thought process if FSIS were to consider an enforcement action for repetitive failure to monitor at the proper frequency?

Corrective Actions

Definitions

- HACCP noncompliance

- Deviation from a critical limit

- the failure to meet any of the regulatory requirements

- the failure to meet the applicable value determined by the plant for a CCP

Regulations – Corrective Actions

- 9 CFR 417.3(a) Deviation From A Critical Limit



Gather Information

1. Did the establishment identify and eliminate the cause of the deviation?
2. Did the corrective actions ensure the CCP is brought under control?

Gather Information

3. Were measures implemented to prevent recurrence of the deviation?
4. Did the actions ensure that no product that is injurious to health or otherwise adulterated as a result of the deviation enter commerce?

Regulations – Corrective Actions

- 9 CFR 417.3(b) Unforeseen hazard



Gather Information

1. Did the establishment segregate and hold all affected product?
2. Did the establishment perform a review to determine the acceptability of the affected product for distribution?

Gather Information

3. Did the establishment take necessary action with respect to the affected product to ensure that no product that is injurious to health, or otherwise adulterated as a result of the deviation, enters commerce?
4. Was a reassessment conducted to determine whether the newly identified deviation or other unforeseen hazard should be incorporated into the HACCP plan?

Assess Information

- Review the corrective action records
 - determine if a reassessment was performed
 - verify that the plant has supporting documentation for decisions made during the reassessment

Knowledge Check

- Does an establishment have to perform a reassessment every time an unforeseen hazard occurs?



Knowledge Check

- Where would you look to verify the reassessment?

QUESTIONS?



CA Workshop II



- What would be the regulatory – statutory basis if FSIS decided to issue an NOIE for repeated failure of an establishment to take all required corrective actions for a deviation?
- Report out

