

HACCP Principle 6 – Verification Activities

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HACCP Principles

- Principle 6.
 - Establish procedures for verification that the HACCP system is working correctly.

Definitions

Verification

“The application of methods, procedures, tests and other evaluations, in addition to monitoring, to determine compliance with the HACCP plan.”

Validation

“Obtaining evidence that the elements of the HACCP plan are effective.”

Validation vs. Verification

- Validation
 - asks whether the hazard analysis was complete and if the control measures are effective
 - “Are you doing the right thing”
- Verification
 - asks whether the HACCP system is being implemented according to the plan
 - “Do what you say”

Types of Verification

1. Validation that the HACCP plan (and its components) are adequate to control hazards.
2. “Routine” verification that the CCPs are in control and effective.
3. Verification that the HACCP system is operating according to the HACCP plan.
4. Regulatory verification.

Validation

What does validation involve?

- Scientific and technical review of the rationale behind each part of the HACCP plan from hazard analysis through each CCP verification strategy

Validation of the HACCP plan; who does it?

- HACCP team
- Individual qualified by training or experience

Initial Validation

- Assure that the plan is valid for controlling food safety hazards associated with the ingredients, process, and product.
- Verify that the plan can be implemented as written.

Initial Validation

- Conducted during the first few weeks or months of HACCP plan implementation
- HACCP team must revise the plan as needed
- Implement changes as quickly as possible

Revalidation

- “Reassessments”
 - Revalidation of the HACCP system after any changes are made that could affect the hazard analysis or the HACCP plan.
 - Required when any changes are made to the HACCP system
 - Regulatory authorities or private standards may require routine reassessments (e.g. USDA and FDA require annual reassessments).

Revalidation

- Also needed when:
 - New information arises concerning the safety of a product or ingredient
 - The product or product category is linked to a foodborne disease outbreak
 - Regulatory agency issues alerts related to the product or process
 - Multiple deviations from a Critical Limit occur
 - Inadequate record-keeping is followed
 - Recalls or product withdrawals occur
 - Consumer complaints occur

Revalidation

- When the reassessment is complete:
 - The HACCP team should issue a report detailing their findings.
 - This report must be maintained as a HACCP record.
- The HACCP plan must be modified immediately if reassessment indicates the HACCP plan is no longer adequate.

Verification

- Designed to ensure that the HACCP plan is being implemented properly.
 - Verification of prerequisite programs
 - Verification of CCPs
 - Verification of the HACCP plan
- Verification procedures may be conducted by internal or external sources.

Verification of Prerequisite Programs

- Premises-related issues:
 - Periodic review of written procedures to ensure the programs are operating as planned.
- Elements of prerequisite programs that are incorporated into the HACCP plan:
 - e.g. calibration of monitoring devices
 - Should be included as a verification procedure

Verification of CCPs

- Primary verification activities for CCPs:
 - Calibration of processing and monitoring instruments.
 - Review of calibration records
 - Review of monitoring records and corrective action reports.
 - Independent check on the adequacy of the CCP to control the identified hazard, if possible.
 - Targeted sampling and testing

Calibrations Are Performed

- On equipment and instruments used in monitoring or verification
- At a frequency to ensure accuracy of measurements
- By checking accuracy against a recognized standard at or near the condition that the instrument or equipment will be used

Verification of the HACCP Plan

- Make certain that the implementation of the HACCP plan complies with the written HACCP plan.
 - Review of HACCP records
 - On-site audit
- Check for compliance with the written HACCP plan, not its validity.

Verification of the HACCP Plan

- Accuracy of the product description and flow diagram
- Critical Control Points are monitored as required by the HACCP plan
- Processes are operating within established critical limits
- Records are completed accurately, at the time intervals required and reviewed appropriately
- Processor review of consumer complaints

Record Review

- Monitoring activities have been performed at the locations specified in the HACCP plan.
- Monitoring activities have been performed at the frequencies specified in the HACCP plan.
- Corrective actions have been performed whenever monitoring indicated deviation from critical limits.
- Equipment has been calibrated at the frequencies specified in the HACCP plan.

Verification Procedures by a Regulatory Agency or External Auditing Body

- These may include
 - Review of the hazard analysis, the HACCP plan and any modification
 - Review of CCP monitoring records
 - Review of corrective action records
 - Review of the verification records
 - Visual inspection of operations to determine if the HACCP plan is followed and records are properly maintained
 - Random sample collection and analysis

Verification Procedures by a Regulatory Agency or External Auditing Body

- Auditing procedures at CCPs should include:
 - Confirming the nature of the operation.
 - Confirming the operator's knowledge of the CCP, the CL(s), and the monitoring and record-keeping activities required by the HACCP plan.
 - Confirm the operator's knowledge of actions to take in the case of a deviation.
 - Observation of the operator performing activities.

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