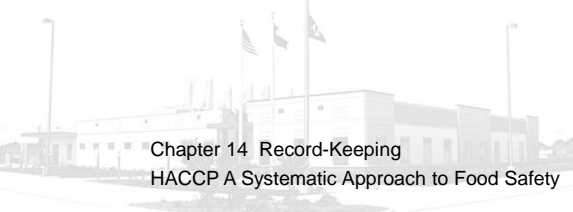



## Principle 7: Establishing Recordkeeping Procedures



Chapter 14 Record-Keeping  
HACCP A Systematic Approach to Food Safety

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Texas Feed and Fertilizer Control Service • Agriculture Analytical Service



## HACCP Principles

1. Conduct a Hazard Analysis (HA)
2. Identify Critical Control Points (CCPs)
3. Establish Critical Limits (CLs)
4. Establish CCP Monitoring Requirements
5. Establish Corrective Actions (CA)
6. Establish Verification Procedures
7. **Establish Record-Keeping Procedures**

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## HACCP Records

- ❑ Provide evidence that HACCP plan is being followed.
- ❑ Are a means of tracing the history of ingredients/products.
- ❑ Provide a mechanism to learn of potential problems.
- ❑ Focus on food safety

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## Types of HACCP Records

- 1) Summary of the hazard analysis
- 2) The HACCP plan
- 3) Support documentation
- 4) Daily operational records

NACMCF endorses the maintenance of 4 types

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## FSMA Animal Feed Regulation: Records

- ❑ Written food safety plan including the written hazard analysis, preventive controls, monitoring procedures, corrective actions procedures, verification procedures and recall plan
- ❑ Records that document the monitoring of preventive controls
- ❑ Records that document corrective actions
- ❑ Records that document verification related to validation, monitoring, corrective action, calibration of process monitoring and verification instruments, product testing, environmental monitoring, records review, reanalysis
- ❑ Records that document the supply-chain program
- ❑ Records that document applicable training for the qualified individual

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## Record-Keeping: Summary of the Hazard Analysis

- ❑ Document the deliberations of the HACCP team
- ❑ Supports the decision on the hazards that are controlled in the HACCP plan
- ❑ Include justification or discussion of the control measures selected to prevent, eliminate or reduce
- ❑ Can be in table form

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### Record-Keeping: The HACCP Plan

- ❑ A list of the HACCP team and assigned responsibilities
- ❑ A description of the food, its distribution, intended use and consumer
- ❑ A verified flow diagram for the entire manufacturing process with CCPs indicated
- ❑ A HACCP plan Summary Table

### Record-Keeping: Support Documentation

- ❑ Establishment of Critical Control Points
  - Process flow with CCPs
  - Could include a record of the decision tree
- ❑ Establishment of Critical Limits
- ❑ Establishment of Monitoring Procedures
- ❑ Establishment of Corrective Action Procedures
- ❑ Establishment of Verification Procedures

### Record-Keeping: Daily Operational Records

- ❑ Monitoring records
- ❑ Corrective action records
- ❑ Verification records

### Documentation Management

- ❑ We rely on documentation to prove that the product that is produced is safe
- ❑ Improper documentation will cause ourselves, customers, and regulating agencies to have doubt in our ability to manage product safely

### Record-keeping Procedures

- ❑ Record entries in an accurate manner at the time the event occurs; note date and time
- ❑ Sign or initial the record
- ❑ Line out errors, correct and initial
- ❑ Use standard forms and documentation procedures
- ❑ Review records regularly and correct any deficiencies

### Record-keeping System

- ❑ Document control is important
- ❑ HACCP plan, charts, forms, SOPs and other instructions must be kept current
- ❑ Outdated materials should be discarded immediately to avoid confusions

## Train Employees in Recordkeeping Procedures

### Train employees

- Monitoring procedures
- How to record data
- Which form to use
- CL associated with CCP
- CA procedure

## Documentation Procedures

- ❑ One person should be responsible for approval of changes in HACCP plan
- ❑ Document when changes go into effect
- ❑ Retain documents and have them accessible

## Length of Time Records Retained

The owner, operator, or agent in charge of a facility shall maintain, for not less than 2 years;

Also

A signed and dated food safety plan

Except for the food safety plan, offsite storage of records is permitted if such records can be retrieved and provided onsite within 24 hours

Existing records to comply with other Federal, State or local regulations do not need to be duplicated if they contain all of the required information and satisfy requirements of this subpart

## Subpart F Applying to Records

§ 507.200 Records requirements

Records must be promptly available

§ 507.207

Records must be kept as original true copies, contain actual values and observations obtained during monitoring and verification, be accurate indelible and legible, be created concurrently with performance of the activity documents, be detailed

Must include information to identify the plant, date, signature or initials, identity of the product and lot code

## Preventive Controls Qualified Individuals

- ❑ Prepares the documents referred to on the previous slide
- ❑ To be a preventive controls qualified individual, completion of training at least equivalent to that received under a standardized curriculum recognized by FDA or otherwise qualified through job experience to develop and apply a food safety system.

### Identifying Recordkeeping and Verification

Product Category: Cattle Protein/Mineral Medicated Supplement

Process Step CCP	Hazard	Record	Responsibility	CCP Verification
Bulk Receiving	Prohibited animal protein	Receiving Bulk Ingredients SOP.	Receiving employee	<b>Short Term</b> Daily review of receiving log and paperwork by QA/QC department
		Cleanout certificate from carrier	Receiving employee	
		Bill of lading from supplier	Receiving employee	<b>Long Term</b> Operational audit performed by designated management personnel to make sure Receiving Bulk Ingredients SOP is followed
		Product labeling	Purchasing	
		Letter of Guarantee	Receiving employee	
		Receiving log	Purchasing	
		Approved supplier list	Production supervisor	
		Record of testing (test strips)	Quality assurance manager	
		Training log (for purchasing personnel if product came from a non-approved supplier)		

Approved: \_\_\_\_\_ Date: \_\_\_\_\_

**HACCP Plan Summary Form**

Product Category: Cattle Protein/Mineral Medicated Supplement

Process Step and CCP	Hazards	Critical Limits for each CCP	Monitoring				Corrective Action	Verification Activities	Record-keeping procedure
			What	How	Frequency	Who			
Bulk Ing. Receiving PH. CCP#1	Prohibited animal protein	Zero Tolerance	Clearout certificate for carriers, Bill of Lading from supplier, Product labeling, Letter of Guarantee (LOG) from supplier, Presence of prohibited animal protein	Visual observation of documentation  Purchase only from approved supplier.	Every load received into the facility	Receiving employee	Reject load in the absence of documentation, test failure, or non-approved supplier  Notify supplier that documentation must be received at delivery  Potential removal of supplier from Approved Supplier List  Training of purchasing personnel if product purchased from non-approved supplier and appropriate disciplinary action	Daily review of receiving log and paperwork by QA/QC department  Operational audit performed by designated management personnel to make sure Receiving Bulk Ingredients SOP is followed	Receiving Bulk Ingredients SOP, Clearout certificate from carrier, Bill of lading from supplier, Product labeling, Letter of Guarantee from supplier, Receiving log, Approved supplier list, Record of testing (test strips), Training log (for purchasing personnel if product came from a non-approved supplier)


Approved: \_\_\_\_\_ Date: \_\_\_\_\_

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## Summary

- Records provide evidence necessary to verify that product was manufactured following the HACCP plan
- Management is responsible
- Compliance with the HACCP plan through record keeping and review of the records will assist in ensuring product safety

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# END

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