Principle 7: Establishing Recordkeeping Procedures

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

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

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

Types of HACCP Records

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

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, records review, reanalysis
- Records that document applicable training for the qualified individual

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
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

Length of Time Records Retained

The owner, operator, or agent in charge of a facility shall maintain, for not less than 2 years, records documenting the monitoring of the preventive controls implemented under subsection (c), instances of nonconformance material to food safety, the results of testing and other appropriate means of verification under subsection (f)(4), instance when corrective actions were implemented, and the efficacy of preventive controls and corrective actions.

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

Identifying Recordkeeping and Verification

<p>| Product Category: Cattle Protein/Mineral Medicated Supplement |</p>
<table>
<thead>
<tr>
<th>Process Step</th>
<th>CCP</th>
<th>Record</th>
<th>Record</th>
<th>Responsibility</th>
<th>CCP Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bulk receiving</td>
<td>Receiving</td>
<td>Receiving report</td>
<td>Receiving employee</td>
<td>Receiving employee</td>
<td>Daily review of receiving log and paper work by QA/QC department</td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td>Receiving certificate from carrier</td>
<td>Receiving employee</td>
<td>Receiving employee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td>Bill of lading from supplier</td>
<td>Receiving employee</td>
<td>Receiving employee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td>Product labeling</td>
<td>Receiving employee</td>
<td>Receiving employee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td>Letter of Guarantee</td>
<td>Receiving employee</td>
<td>Receiving employee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td>Receiving log</td>
<td>Receiving employee</td>
<td>Receiving employee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td>Approved supplier list</td>
<td>Receiving employee</td>
<td>Receiving employee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td>Report of testing (strip test)</td>
<td>Receiving employee</td>
<td>Receiving employee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Receiving</td>
<td>Training log (for purchasing personnel &amp; receiving personnel)</td>
<td>Production supervisor</td>
<td>Quality assurance manager</td>
<td></td>
</tr>
</tbody>
</table>

Approved: ______________________ Date: _______________

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