Is Your Plan Working?

by Melissa Vaccaro, MS, CHO
Let’s review the 7 Principles of HACCP:
1. Conduct a Hazard Analysis
2. Determine Critical Control Points (CCPs)
3. Establish Critical Limits
4. Establish Monitoring Procedures
5. Establish Corrective Actions
6. Establish Verification Procedures
7. Establish Record-Keeping and Documentation Procedures

Principle #6 of the HACCP plan should clearly spell out:
- Who is responsible for verification procedures
- The frequency of the various verification activities
- The procedures and forms used for verification

Who should perform the verification activities? Verification of a HACCP plan is usually conducted by someone other than the person who is directly responsible for performing the activities specified in the plan. That should make sense—a second set of eyes. It might be a manager, supervisor, external auditor, or regulatory authority, but it should be someone who could effect change should deviations be noted. If internally done, verification activities should be part of someone’s job description.

How often should verifications of a HACCP plan be done? This will vary. Verification is conducted frequently, such as daily, weekly, or monthly to ensure that the plan is being followed continuously. You need to verify often enough that you can ensure unsafe food is not reaching the customer, corrective actions are taken that could prevent loss of food, personnel practices are followed, and all CCPs are under control. Documents should be kept as part of HACCP Principle #7, record keeping. The more often you verify, the quicker you are aware of a problem should one be found, and the faster you can respond to the issue. Responding fast will assure no compromised food reaches customers.

Verification activities may include:
- Observing if employees are carrying out critical procedures (those associated with a CCP) correctly.

Do you have a large manual that sits on your desk or bookshelf and collects dust? Is it your HACCP plan?
Answers to FPC Review Questions

CDMs who answer the FPC Review Questions on page 15 of this issue can check their responses against the answer key found on page 39. This “self check” allows you to confirm your understanding of the test questions.

Validation of a plan is different than verification of a plan. The verification activities described above are done to determine whether HACCP procedures are being executed as laid out in the HACCP plan (i.e., whether you are doing what you said you would do). Validation, however, is done to establish whether the plan is working to control the significant hazards (i.e., whether you are doing the right things). Validation is a component of verification, but it focuses on collecting and evaluating scientific and technical information to determine if the HACCP plan, when properly implemented, will control identified hazards. More specifically, validation is done to determine if the hazard analysis is still appropriate and realistic, is controlling hazards, and is based on current science.

Unlike verification, validation involves re-examining the hazard analysis, CCPs, CLs, monitoring activities, and other aspects of the HACCP plan to assure that the proper hazards are identified and are being controlled. Validation occurs much less often, yearly in most cases, and is typically done at the corporate office, by general managers, owners, or by third party auditors. An example of validation might be comparing your current HACCP plan with the current Food Code. Does your plan need updating to meet any new criteria of the code? Is your HACCP plan current with today’s science? If not, the plan needs updating and employees must be informed of those updates through training.

Active, continual, and consistent verification of a HACCP plan by management will ensure that Active Managerial Control is in place in your facility on a daily basis. It will force you to pull that HACCP plan off the shelf regularly. In the hustle and bustle of foodservice operations, verification of the plan is often forgotten, overlooked, or pushed aside. As a manager of a food facility, don’t assume everything is running smoothly every day, or that all employees are implementing the HACCP plan as required. You must verify frequently. Do not forget this important step in your overall HACCP plan.

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