

HACCP Principle 7:

Establish effective record keeping procedures that document the HACCP system.

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***“If it isn’t written down,
it didn’t happen.”***

-Tom Clancy from *Debt of Honor*

Why Keep Records?

- Evidence of product safety
 - present procedures and processes
 - product traceability and record review
- Audits
 - Customer, Federal and Insurance
- Employee training
- Problem solving
 - provides history
 - learn of potential problems



Types of Records

- **The HACCP Plan**
- **Records obtained during operation of plan**
- **Supportive Documentation**



Types of Records

The HACCP Plan:

- List of HACCP team
- Product Description
- Flow Diagram
- Identification of Hazards
- Establishing CCPs
- Establishing Critical Limits
- Monitoring system
- Corrective actions plans
- Record keeping procedures
- Procedures for verification

Types of Records

- **Records obtained during operation of plan :**
 - **Daily CCP Records**
 - **Calibration records**
 - **Receiving log for ingredients, packaging**
 - **Employee Training Records**
 - **Validation of HACCP Plan**

Types of Records

- **Supportive Documentation :**
- **GMP's**
- **SOP's**
- **Data to support Critical Limits**
- **Testing Methods (SOPs) for measuring CL's**
 - **accuracy of method, background documentation**
 - **calibration procedures (SOP)**
- **Ingredients and packaging specs**
- **MSDS's**

417.2 Hazard Analysis and HACCP Plan

- Records

(a)(1) “The written hazard analysis ... including all supporting documentation.”

417.2 Hazard Analysis and HACCP Plan

- **Records**

(a)(2) “The written HACCP plan, including decision making documents associated with the selection and development of CCP’s and CL’s, and documents supporting both the monitoring and verification procedure selected and the frequency of those procedures.”

417.5 Monitoring Records

- **(a)(3)**
 - **include recording of actual times, temperatures or other quantifiable values**
 - **calibration of process-monitoring instruments**
 - **corrective actions, including all actions taken in response to deviations**

417.5 Monitoring Records

- verification procedures and results
- product code(s), product name or identity, or slaughter production lot
- include date the record was made



417.5 Monitoring Records

- **record entries shall be made at time event occurs**
- **include time and date entry recorded signed or initialed by employee making entry**
- **maintaining records on computer acceptable with appropriate controls**

417.2 Hazard Analysis and HACCP Plan

- **Monitoring CCPs**

(c)(6) “... records shall contain the actual values and observations obtained during monitoring.”

Temperature Log	
Time	Temp
8:00	40°F
8:15	40°F
8:30	40°F

Temperature Log	
Time	Temp
8:00	37.6°F
8:15	39.2°F
8:30	38.6°F

417.5 Record Review

- **(c)**
 - **Review records prior to shipping product**
 - **Review to ensure:**
 - **Completeness**
 - **Critical Limits met**
 - **Proper corrective action taken**

417.5 Record Review

- **(c) “...Where practical, this review shall be conducted, dated and signed by an individual who did not produce the record(s), preferably by someone trained in accordance with 417.7 ...or the responsible establishment official.”**

417.5 Record Review

- **417.7(b) HACCP Training to include:**
 - application of 7 principles to meat or poultry product
 - development of a HACCP plan for specific product
 - record review
- **417.5(c) Responsible establishment official:**
 - The individual with overall authority on-site or a higher level official of the establishment.

Record Review

- **Daily Review for Completeness**
- **Review for deviations and irregularities**
- **Follow-up on product disposition**
- **Designated, responsible individual**
- **Initial and date**
- **Keep them organized**

Retention of Records: 417.5(e).

- **Slaughter**
 - at least one year
- **Refrigerated product**
 - at least one year
- **Frozen, preserved, or shelf stable products**
 - at least 2 years

Regulatory Access

- **417.5(e).**
 - **Off-site storage permitted after 6 months if records can be retrieved within 24 hours of an FSIS employee's request.**
- **417.5(f)**
 - **all records required...shall be available for official review and copying.**

**“It’s not so much
what you do,
but rather
how you appear to be doing
it.””**

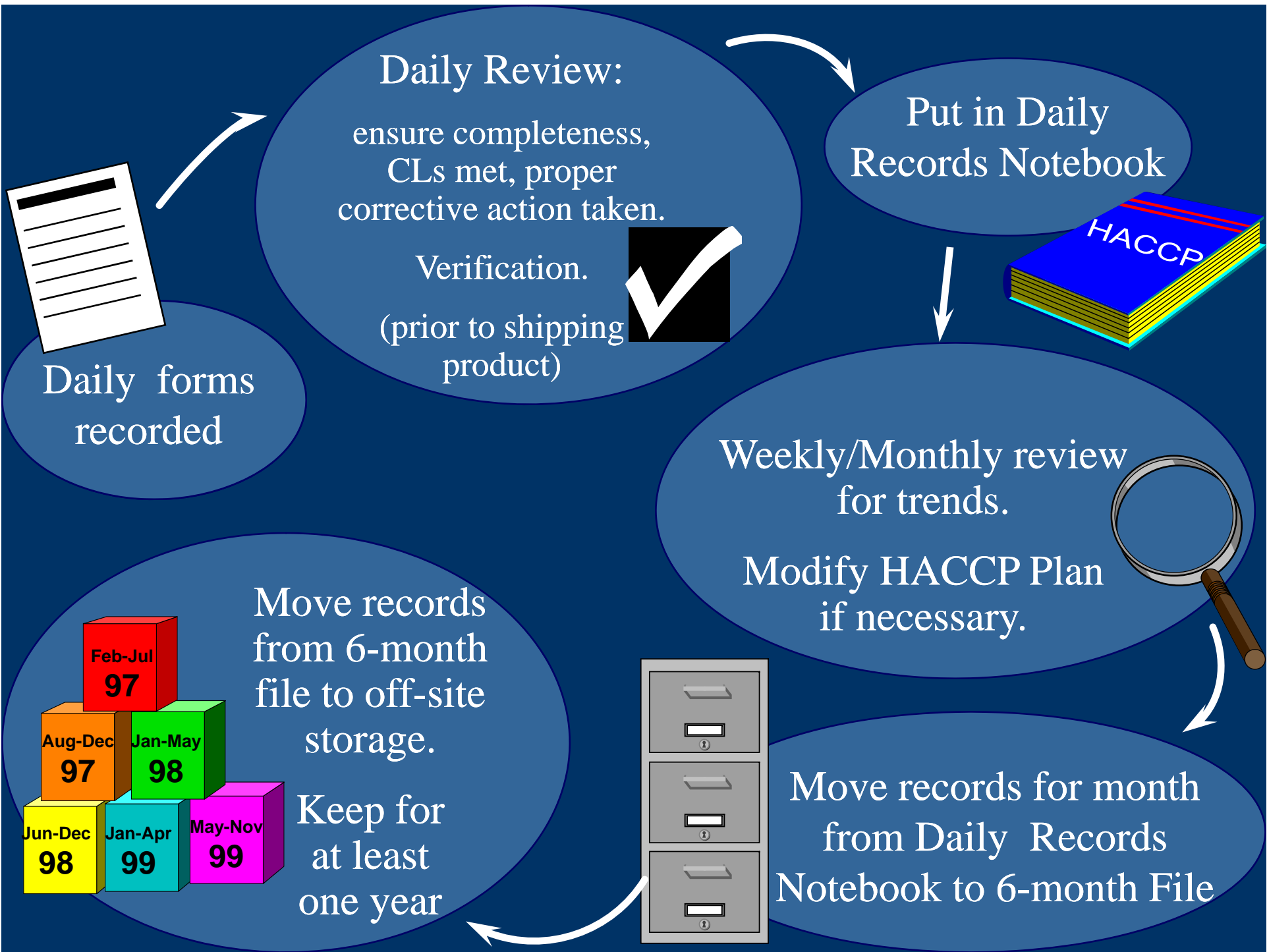
Record Keeping Procedures

These records may be your only proof!

- **Never pre-record data or ditto**
- **Never postpone making entries and rely on memory**
- **Modifications:**
 - **never “white out” or erase**
 - **line out and correct; initial change**
- **Standardize forms**

Appendix C- Guidebook for the Preparation of HACCP Plans

- **Records must contain at least the following information:**
 - **title and date of record**
 - **product identification**
 - **critical limit**
 - **line for monitor's signature or initials**
 - **place for reviewer's signature**
 - **orderly manner for entering data**



Daily Review:

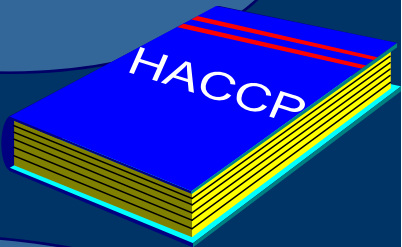
ensure completeness,
CLs met, proper
corrective action taken.

Verification.

(prior to shipping
product)



Put in Daily
Records Notebook



Weekly/Monthly review
for trends.

Modify HACCP Plan
if necessary.

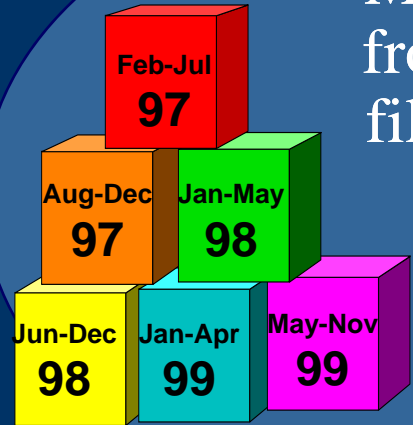


Move records for month
from Daily Records
Notebook to 6-month File



Move records
from 6-month
file to off-site
storage.

Keep for
at least
one year

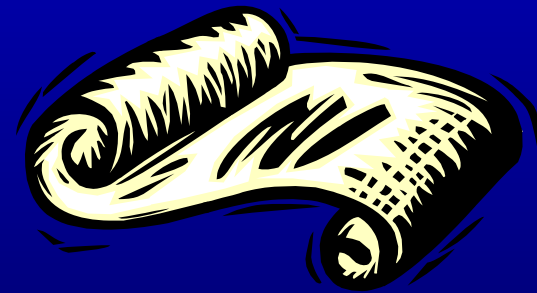


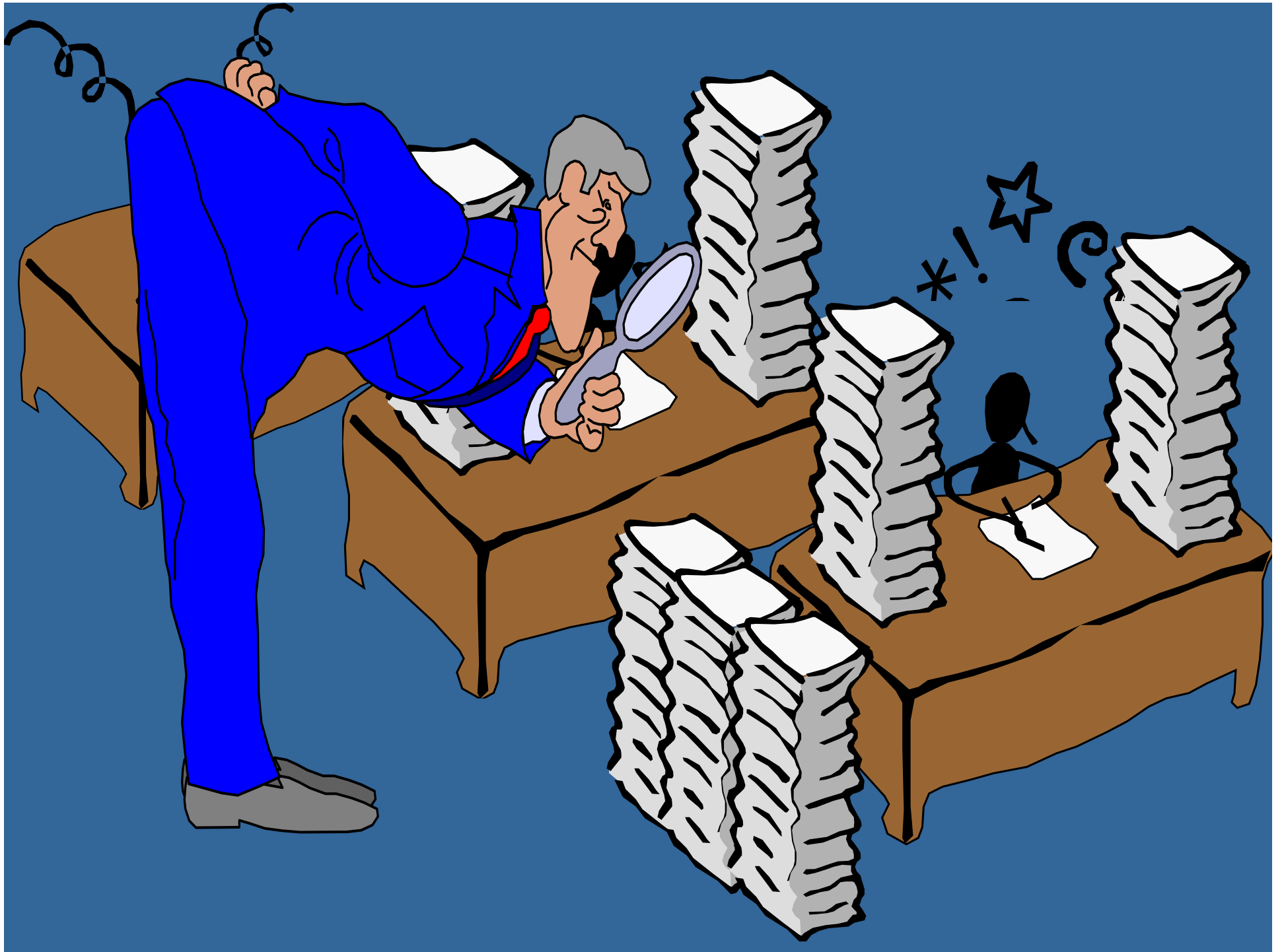
Daily forms
recorded



HACCP Plan

- A “dynamic” document
 - keep it current
 - keep it simple
 - make it easy !
- HACCP Manual
 - keep it organized





Records

- **Focus on the records associated with the CCP for the Records in the Principle 7 sheet.**
- **Remember to include:**
 - **Records for monitoring the critical limit.**
 - **Records for corrective actions.**
 - **Records for verification, including review, calibration, and direct observation.**

Examples

Principles 6 and 7 Record Keeping and Verification

Product:

Process Step/CCP	Verification Procedures	HACCP Records
Fermentation CCP 1B, pH <5.0	<ol style="list-style-type: none"> 1. The smokehouse operator will calibrate the pH meter according to manufactures recommendations using the standard two point calibration between pH 4.0 and 7.0. The meter will be calibrated for the measurement of each batch of sausage. 2. The HACCP coordinator will review the CCP and Corrective action records for pH daily. 3. A member of the HACCP team will directly observe the CCP monitoring procedures once per month and will observe corrective actions once per month or when a corrective action occurs. 	Fermentation record that includes the measurement of the Critical Limit and the daily review of records. Deviation and corrective action record. pH meter calibration record. Direct observation of CCP monitoring and/or corrective action record.

Additional Items

- **Records are focused on the CCP.**
- **Records that reflect the entire HACCP plan are not usually included on the Principle 7 form.**
- **Compliance with regulations or audits by outside companies may require additional records not listed on the Principle 7 form.**