



Food Safety Plus™ Pty Ltd

HACCP Certification Requirements

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8. HACCP CERTIFICATION CRITERIA

8.1 Introduction to the FOOD SAFETY PLUS HACCP Certification Criteria

The Food Safety Plus HACCP Certification Criteria has three principle components. The first concentrates on Management System requirements which contain those elements common to any good management system - food safety policy, organisational structure and responsibilities, document & record control procedures. The second element is the requirement for the development of a HACCP Plan based on the seven principles of HACCP as developed by the Codex Alimentarius Commission. The third element of the system is for procedures which are collectively known as prerequisite programs, support programs, Good Manufacturing Practices (GMP), or Good Hygiene Practices (GHP), and include elements such as staff hygiene policies, approved supplier programs, cleaning programs, recall procedures, etc.

Certification of a HACCP Food Safety System is not a guarantee by Food Safety Plus of an organisation's food safety performance, or that there will be no food safety hazards caused by the certified organisation, or that legislative requirements and food safety standards and codes of practice will always be met. Certification is a statement of compliance with our HACCP Criteria at the time of certification, and a statement of the assessed overall ability of the organisation to identify and control potential food safety hazards.

8.2 Management System Requirements

Your organisation shall develop, document and implement the following management system elements to support your HACCP Food Safety System:

8.2.1 Food Safety Policy

Your organisation shall develop and support a policy which states the business intent and objectives for the supply of safe products that meet customer expectations and legal requirements. The policy shall outline the business' commitment to continuous improvement, include a commitment to produce safe and legal food products and be signed by the senior executive manager. The policy shall be communicated to all staff within the business.

8.2.2 Organisational Chart & Job Descriptions

A current and accurate organisational chart shall be available which identifies all the management and staff positions within your organisation.

Position descriptions shall be available for all positions on the organisational chart which have responsibility for food safety and maintenance of the HACCP system.

8.2.3 Description of How the System Works

Your organisation shall provide a written description of the documents that are included in the HACCP Food Safety System where documents and records are kept, and the processes in place to implement the Food Safety System and their inter-relationship.

8.2.4 Document Control (Principle 7)

Your organisation shall establish a written procedure describing how all documents within the HACCP System are controlled to ensure only the most current and authorised version is available to all staff. The date and/or version number shall be indicated within each document.

External documents required to maintain the system including relevant industry standards, guidelines, regulations, recall protocols; etc shall be retained and controlled.

An amendment register shall be maintained where any amendments are made to the documents listed in the documents register.

8.2.5 Document Register

A list of all the documents that are included in the HACCP System shall be developed. The register shall include documents describing:

- Product Description & Intended Use,
- Hazard Analysis, including Risk Assessment;
- HACCP Audit Table,
- Specifications,
- Recipes, Procedures, Work Instructions
- Prerequisite programs,
- Policies, Forms,

8.2.6 Record Control (Principle 7)

Your organisation shall establish a written procedure describing how records associated with the HACCP system are retained, protected, accessed and disposed. Records shall be retained for a minimum of 2 years or longer as required by legislation.

8.2.7 HACCP Food Safety Management Review

The HACCP System shall be reviewed at least annually including the Food Safety Policy, organisational chart, document control, internal and external feedback, corrective and preventive actions, verification activities and prerequisite programs.

In addition to the annual review, the HACCP System shall be reviewed annually and where any changes occur which could potentially introduce change to the content or application of the HACCP System.

Records shall be maintained of management system reviews.

8.3 Preliminary Steps

(Steps 1-5 of Codex HACCP)

Your organisation shall develop, document, and implement a HACCP Plan based on Codex Principles. The HACCP Plan shall consider all food safety hazards, as well as quality and other hazards (where applicable)

The following reflects steps 1-5 of the Codex HACCP Guideline and shall be included as part of this process.

8.3.1 The HACCP Team

(Step 1 of Codex HACCP)

The organisation shall identify and document the members of the HACCP team, who are those within the business that have the process skills and knowledge to develop and maintain the HACCP Plan. At least one HACCP team member, who also has operational accountability within the organisation, shall be competent in the application of HACCP. This team member shall have attended a competency-based training course in the application of HACCP Principles, or equivalent.

8.3.2 Scope and Purpose of your HACCP Plan

(Step 1 of Codex HACCP)

The scope of the HACCP Plan shall be defined and documented, including the start and end point of the process(es) under consideration within the HACCP Plan, and the products covered by the HACCP Plan.

The purpose of the HACCP Plan shall be defined and documented. The purpose shall include the intent that all food safety and quality hazards will be identified and controlled.

8.3.3 Product Description and Intended Use.

(Steps 2, 3 of Codex HACCP)

A Product Description shall be developed and documented for all products included within your product scope. 'Like' products that are processed in similar ways may be grouped together in the one Product Description. Products that are processed differently require a separate Product Description. Each Product Description shall cover the following criteria:

- Description of product
- Composition
- Physical/chemical structure
- Microcidal/static treatment including method of preservation
- Packaging – primary & secondary
- Storage, handling & distribution methods
- Shelf life
- Intended Use of the product(s);
- Labelling requirements (as per Food Standards Code)
- Sensitive consumers

If your organisation already has finished product specifications that cover the same information as outlined above, then the specifications may satisfy this requirement.

8.3.4 Flow Diagram

(Steps 4, 5 of Codex HACCP)

All the major steps in the process (or processes) shall be identified and documented on a flow diagram. If there are any significant inputs at a particular step, they shall also be identified on the flow diagram. Examples of inputs include water, rework etc. Once developed, the HACCP Team shall verify the accuracy of the Flow Diagram on site.

8.4 Hazard Analysis Table

8.4.1 Hazard Identification, Analysis and Control

(Step 6, Principle 1 of Codex HACCP)

A hazard analysis shall be undertaken and documented at each step of the process as identified in the flow diagram (refer 8.3.4). At each step, all possible food safety and quality hazards shall be considered and documented, and the cause of the hazard should also be documented.

Once all hazards have been identified, a risk assessment shall be undertaken to determine which hazards are significant for your organisation and which ones are not. Significance is to be determined by comparing severity of the hazards against the likelihood of the hazard occurring.

There is no specific methodology required to be used to determine significance. However once determined, the method shall be applied consistently throughout the HACCP Plan and shall be referenced.

For all hazards that are determined to be significant, at least one control measure shall be determined to prevent it from occurring or reduce it to an acceptable level.

8.4.2 Determining Critical Control Points

(Step 7, Principle 2 of Codex HACCP)

A Critical Control Point (CCP) is a step in the process at which control shall be applied to eliminate a food safety hazard or reduce it to an acceptable level. A CCP is an action taken as part of the process flow, and may not be a control measure as already identified.

There is no limit to the number of CCPs in a process and it will vary considerably according to the complexity of the process and equipment, the type of raw materials/ingredients you use, and your finished product.

There is no specific methodology required to be used to determine CCPs. Your organisation may develop the method or utilise the Codex HACCP decision tree. However the CCP determination shall identify all the process steps where control is necessary to eliminate or reduce a food safety hazard, and shall be applied consistently to all process steps.

8.5 HACCP Audit Table

A HACCP Audit Table shall be developed, documented and applied which includes each step of the process(es). It shall list all the CCPs (or QCPs to control quality hazards) identified in the Hazard Analysis, and shall include the following requirements:

8.5.1 Establish Critical Limits

(Step 8, Principle 3 of Codex HACCP)

For all CCPs, critical limits shall be established and documented in the HACCP Audit Table. Critical Limits establish the difference between safe and unsafe (good quality and poor quality product). If the critical limit for a CCP is exceeded a hazard may exist.

Where critical limits are not available through industry standards, legislation, codes of practice or published research, it is the responsibility of your organisation to undertake a validation study to ensure that the limits will control the significant hazard. Validation data shall be documented and maintained by your organisation.

8.5.2 Monitoring of CCPs

(Step 9, Principle 4 of Codex HACCP)

Your organisation shall document how each CCP (and QCP) is to be monitored to ensure it is within the critical limits that have been set.

Monitoring procedures shall define what is being monitored, how the monitoring is done, the frequency of the monitoring, where the monitoring is to be undertaken and who is responsible for undertaking the monitoring.

When determining the frequency of monitoring, it shall be sufficient to ensure that the CCP is under control.

Your organisation shall also ensure that staff who conduct monitoring checks are trained in the correct method and that training is assessed and documented.

Records of monitoring of CCPs shall be maintained and be signed by the person responsible for the monitoring and by a responsible reviewing officer.

8.5.3 CCP Corrective Actions

(Step 10, Principle 5)

CCP Corrective Actions shall be developed, documented and implemented that define the action(s) to be taken when monitoring reveals that the critical limits have not been met

The procedures shall state what action is to be taken regarding the affected product and what procedures are undertaken to determine the root cause of the problem and prevent its recurrence.

8.6 Verification Activities

(Step 11. Principle 6 of Codex HACCP)

Verification procedures are required to ensure that the HACCP System is being followed and is effective. As a minimum, the verification activities that shall be undertaken include: internal audits, HACCP plan review, microbiological and chemical testing (where applicable), shelf life testing (where applicable), finished product assessments (where applicable), and review of monitoring and corrective action records.

8.6.1 Internal Audits

An internal audit of the entire HACCP Food Safety System shall be carried out on a (minimum) annual basis, and sufficient to maintain the effectiveness of the system. Records of internal audits shall be retained.

8.6.2 HACCP Plan Review

The HACCP system shall be reviewed at least annually, and when changes in production, formulation, equipment, processes or procedures occur which could potentially introduce new hazards or change the significance of existing hazards. Appropriateness of the system should be reviewed and verified by the HACCP team.

8.6.3 Microbiological & Chemical Testing Schedule

Where microbiological and/or chemical hazards have been identified as important during the hazard analysis process, a schedule of testing shall be included to confirm that CCPs and QCPs are under control.

8.6.4 Shelf-Life Testing (producers/manufacturers/packers only)

Where products are labelled with "Use by" or "Best-Before Date", a schedule of shelf-life testing shall be implemented. This includes the tests to initially establish the shelf life (which is indicated in the Product Description) and from then on, end of shelf life testing to verify that shelf life is being met. This also applies to products shipped for further manufacturing or rework.

Shelf Life tests include microbiological and organoleptic test, and may in some instances include physical testing (eg weight loss during storage).

The shelf-life testing schedule shall include the type of testing to be undertaken and shall be carried out on each product, or product type, at least annually.

Results of the tests shall be reviewed and signed by a responsible officer within the organisation and corrective action taken when results indicate that limits have been exceeded.

8.6.5 Finished Product Assessments

A schedule of assessments of finished product against your finished product specifications shall be developed, documented and implemented. Finished Product Assessments are required by the business to ensure the product is edible and legal. Records of these assessments shall be kept.

8.6.6 Monitoring and Corrective Actions of Verification Activities

A schedule shall be developed for reviewing monitoring activities and corrective actions.

8.6.7 Customer Complaints

A process for reviewing customer complaints that relate to food safety and quality issues shall be developed, documented and implemented.

8.6.8 Records of Verification Activities

Records of all verification activities shall be maintained by your organisation.

8.7 Prerequisite (Supporting) Programs

The following prerequisite (sometimes referred to as “supporting”) programs shall be included in your HACCP Food Safety System. The extent to which they apply will vary with the type of business and food safety risk. However they shall all be considered and applied where appropriate

8.7.1 Staff Hygiene

A staff hygiene policy and procedure shall be developed, documented and implemented that covers all the relevant sections of Standard 3.2.2 of The Food Standards Code (Australia) *Food Safety Practices & General Requirements*. As a minimum, the following criteria shall be included:

- Staff illness
- Eating, drinking & smoking restrictions
- Hand-washing requirements
- Sneezing, coughing & blowing of noses
- Cuts, wounds & bandage requirements
- Clothing requirements
- Jewellery restrictions
- Staff facilities provided by the organisation. This is to include, but not limited to, areas for staff to keep personal belongings, hand-washing & drying facilities, areas for eating drinking and smoking
- Staff movement restrictions

Staff Hygiene compliance checks shall be undertaken and records of these checks maintained. The frequency of the checks is to be determined by the organisation and defined within the policy.

8.7.2 Housekeeping Practices and Stock Control

A Housekeeping and Stock Control policy and practices shall be documented, including, as a minimum::

- The organisation shall ensure that the oldest stock and ingredients are used first.
- Ingredients, raw materials, work in progress, finished product and packaging shall be stored in such a manner that they do not pose a safety or quality risk to the product.
- The organisation shall document the measures taken to prevent glass, wood, hard plastic and ceramic from entering the product.
- The organisation shall document what happens to product that may have come into contact with the floor or any other unsanitised surface.
- The organisation shall document how non-food items that could pose a risk to the safety and or quality of the products, are stored.
- The organisation shall document how chemicals that could harm the products are to be stored.
- Premises Construction & Layout shall meet the requirements of Standard 3.2.3 of the Australian Food Standards Code - *Food Premises and Equipment*
- An adequate supply of potable water shall be available to ensure the safety & suitability of the products supplied. Only potable water is permitted to be used for the following activities - post harvest wash treatments, hand-washing, cleaning, as an ingredient, to make ice. Recirculated water for reuse in production, hand-washing and/or cleaning shall be treated. The treatment process shall be effectively monitored and the treated water tested to verify its safety.
- All vehicles used to transport raw materials, packaging, work in progress and/or finished product shall be maintained in a good state of repair and in a clean & hygienic condition. The transport vehicle(s) required to transport chilled food shall be able to maintain that food at or below 5°C, maintain the temperature of frozen food, and where required to transport hot food, can maintain a temperature at or above 60°C.

Housekeeping and Stock Control checks are required to be undertaken and records of these checks maintained. The frequency of the checks is to be determined by the organisation and defined within the policy.

8.7.3 Approved Supplier Program

An Approved Supplier Program is required for all products and services that could affect the safety or quality of your organisations finished product. Your organisation shall determine and document the requirements for approving each supplier and service provider and the means to discontinue trade with the supplier. The following suppliers/providers shall be included:

- Raw Ingredients & Finished Goods Suppliers
- Packaging Suppliers
- Chemical Suppliers
- Service Providers

An annual review of all approved suppliers shall be undertaken to verify their performance. Records of the reviews shall be maintained.

8.7.4 Product Identification & Traceability.

The organisation shall have a procedure that ensures, for all stages of production from receipt through to finished goods, products are clearly identified. This shall include raw material receipt, storage, work in progress, rework, final product, on hold product, reject product, quarantined product, returned product, downgraded/damaged stock, pet food/animal feed, and waste product(s).

8.7.5 Skills and Training Policy

The organisation shall also develop a skills and knowledge policy to ensure that all staff members whose actions directly or indirectly impact on the safety of the food and/or ingredient, are competent in food safety at a level appropriate to the role they perform.

In addition, any staff member who is responsible for an activity that is associated with a CCP, QCP or responsible for the implementation of a prerequisite program shall be competent in that activity.

The policy shall include a review of staff food safety competence as part of the internal audit program. Records of all training and qualifications undertaken by staff and records of competence reviews shall be maintained.

8.7.6 Cleaning

The organisation shall develop, document and implement a cleaning program. The program shall identify the following:

- Areas within and outside the premises that require cleaning.
- Equipment that requires cleaning
- Between batch cleaning
- Method of cleaning
- Frequency of cleaning
- Chemicals used (if applicable). All cleaning chemicals that either directly or indirectly come into contact with food shall be food grade. Evidence that all cleaning chemicals on site are food grade shall be maintained.
- Person(s) responsible for the cleaning
- Records of cleaning

The cleaning program shall state how monitoring of cleaning is undertaken, the frequency of monitoring, and corrective action to be taken if monitoring reveals that the cleaning is not effective

A schedule of microbiological swabbing to verify the effectiveness of cleaning is also required in high-risk food production plants. Records of monitoring, corrective action and results of swabbing shall be maintained.

(Note: *high risk food processes* means the production, handling, storage, or processing of food that may lead to a significant likelihood of food borne illness or consumer injury if not effectively controlled).

In premises where allergen control is essential, "allergen cleans" are required between product runs, including retention of first-run product following the clean to test for allergen traces.

8.7.7 Pest Management

The organisation shall have in place a documented pest management program which includes a schedule for the application and frequency of treatments.

The program shall state how monitoring is undertaken and the frequency of monitoring, and corrective action to be taken if monitoring indicates the program is not effective.

The program shall also include:

- To ensure the entire premises is controlled, bait maps depicting the type and location of treatments.
- A current Material Safety Data Sheets (MSDS) shall be maintained for any pest control chemical that is being used on site.
- Where an external pest control contractor is used, you shall obtain a copy of the contractor's licence.
- Records of monitoring and corrective action shall be maintained.

Chemicals used to control pests on or near food, food packaging, or food contact surfaces shall be food grade.

8.7.8 Maintenance

Equipment used to produce, prepare, store, process, or pack food shall be suitable for purpose, food grade (if in contact with food), easily cleaned, and assessed regularly to ensure it is in good condition.

Your organisation shall have in place a planned maintenance procedure and schedule for all food processing plant, equipment, services, premises and surrounds.

A record shall be kept of equipment inspections and planned maintenance.

Personnel involved in conducting maintenance, whether staff or contractors, shall adhere to the staff hygiene policies.

8.7.9 Calibration

Your organisation shall have in place a documented procedure to ensure that all equipment used to inspect, measure or test the product is reading accurately so that the results of these readings can be relied upon.

A calibration schedule shall be available and include the following:

- A list identifying all equipment that requires calibration
- Frequency of calibration.
- Method of calibration
- Acceptable degree of accuracy
- A method of identifying equipment that is out of calibration
- A method for taking corrective action on product produced whilst equipment was out of calibration.

Records shall be available of all calibrations, calibration checks and any corrective action taken when equipment is found to be out of calibration.

8.7.10 Recall

The organisation shall have a recall procedure in place that complies with the requirements of the current edition of the Food Industry Recall Protocol published by Food Standards Australia and New Zealand (FSANZ).

The procedure shall contain a current version of the Food Recall Action Officers list published by FSANZ.

The organisation shall undertake an annual mock recall to verify the effectiveness of the recall procedure and demonstrate actions taken as a result of that recall.

Records of the mock recall shall be kept and available.

8.7.11 Labelling

Your organisation shall document, develop and implement a procedure for the preparing of and the reviewing of labels which includes:

- Labels shall be prepared so as to comply with FSANZ Food Standards Code, Trade Measurement requirements and other applicable regulations that may apply in certain specific sectors (eg poultry industry).
- Labels shall be reviewed at least annually and more frequently if any of the following occur;
 - Changes to laws in relation to labelling
 - Changes to recipes including the introduction of ingredients that contain allergens
 - Changes to the labels/packaging are made

Records of labelling reviews shall be maintained.

8.7.12 Corrective Action of the HACCP System

You shall have in place a documented corrective action procedure in addition to the corrective action requirements detailed on the HACCP Audit Table and prerequisite programs. The purpose of Corrective Action is to help identify the root cause of problems and system faults as they occur, and to help prevent re-occurrence of the situation.

The Corrective Action Procedure shall be implemented for the following situations:

- Customer complaints
- Continual product rejections
- Production of unsafe products
- HACCP Food Safety System failures.

The procedure shall describe the personnel responsible, how corrective actions are to be recorded, reviewed and investigated, and records shall be maintained.