



Project: Technical assistance to improve implementation of food safety standards and disease crisis preparedness

Training course: Training on step-by-step drafting/preparation of HACCP plan and implementation of good hygiene practices and HACCP principles
- HACCP Principle 7

Lecturer: Prim. D-r Lenche Jovanovska

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EU Legislation

Reg (EC) 852/2004, Art.5.2.:

1. Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP Principles.

2. The HACCP Principles referred to in Paragraph 1 consist of the following:

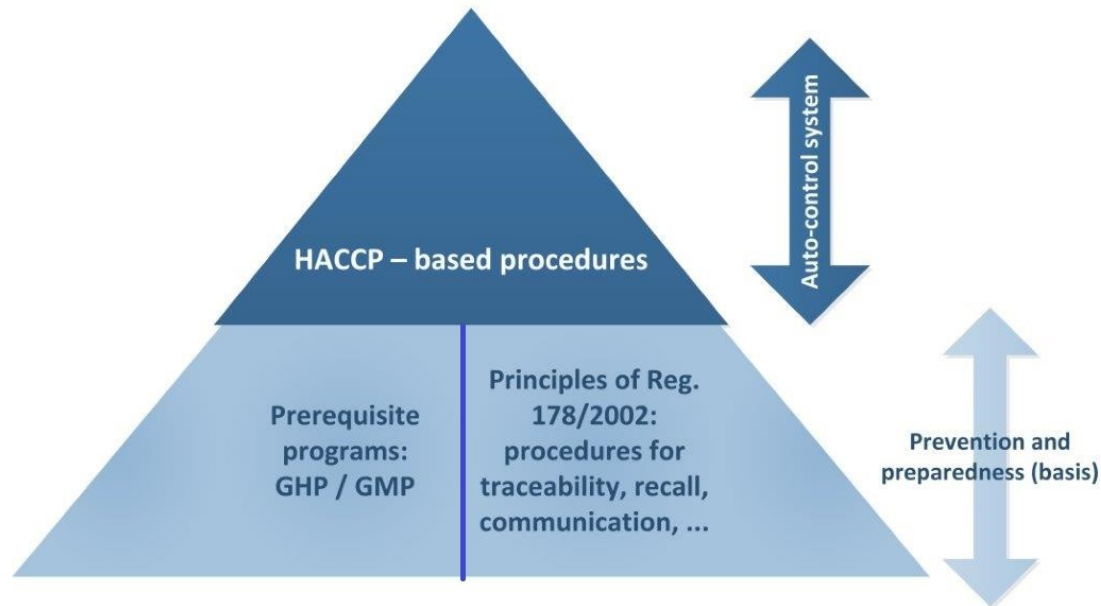
(g) Establishing **documents and records** commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f).



Principle 7: documentation and record keeping



Food Safety Management System



Principle 7: documentation and record keeping



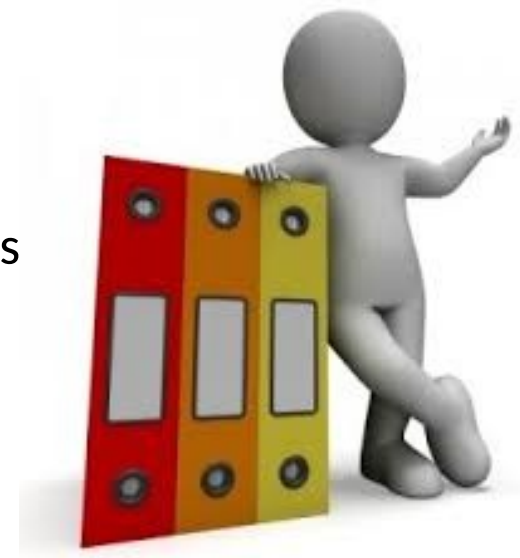
How can a FBO go back to what happened on the manufacturing day in case of a food safety problem (recall, customer complaint, ...)?

Efficient and accurate **record keeping** is essential to the application of HACCP-based procedures.

HACCP-based procedures should be **documented** by the HACCP-plan and **continuously updated** by records on findings.

Do not forget to record the actions taken to comply the paragraph following subparagraph (g) that says:

When any modification is made to the product, process, or any step, the FBO shall review the procedure and make the necessary changes to it.



Principle 7: documentation and record keeping



Documentation and record keeping should be appropriate to the **nature and size of the operation** and sufficient to assist the business to verify that the HACCP-based procedures are in place and being maintained.

E.g.: Would the same documentation be for the cheese manufacturing in a big industrial factory and a small traditional manufacturer?

Maintaining proper **HACCP records** is an essential part of the HACCP system



Principle 7: documentation and record keeping



Records serve as **written documentation** of your establishment's compliance with its HACCP plan.

Records allow you to **trace the history of an ingredient**, in process operations, or a finished product, should problems arise.

Records help you **identify trends in a particular operation** that could result in a deviation if not corrected.



Principle 7: documentation and record keeping



If you are ever faced with a product recall,

- HACCP records could help you identify and narrow the scope of such recall,
- Well-maintained records are good evidence in potential legal actions against an establishment.



Principle 7: documentation and record keeping



Expert developed HACCP guidance materials (e.g. sector-specific HACCP guides) may be utilized as part of the documentation, provided that those materials reflect the specific food operations of the business.

Documents should be signed by a responsible reviewing official of the company.



Principle 7: documentation and record keeping



Documentation should at least include:

- PRPs applied, working instructions, standard operational procedures, control instructions;
- Description of the preparatory stages (before 7 principles),
- Hazard analysis;
- CCP (+ oPRPs and CP) identification;
- Critical limit determination;
- Validation activities;



Principle 7: documentation and record keeping



Documentation should at least include:

- Corrective actions anticipated;
- Description of planned monitoring and verification activities (what, who, when);
- Registration forms;
- Modifications to the HACCP-based procedures;
- Supporting documents (generic guides, scientific evidence, etc)



Principle 7: documentation and record keeping



Logical Steps in Establishing Record keeping Procedures

1. Review the records you currently maintain and determine which ones adequately address the monitoring of the CCPs you have identified, or develop forms for this information.
2. Develop any forms necessary to fully record corrective actions taken when deviations occur.
3. Develop forms to document your HACCP system.
4. Identify the employees responsible for entering monitoring data into the records and ensure that they understand their roles and responsibilities.
5. Enter the record form name(s) on the appropriate HACCP Plan Form or HACCP Worksheet under column adjacent to the appropriate CCP.

**I love my job,
I love my job,
I love my job.***

* Repeat as necessary until convinced.

Principle 7: documentation and record keeping

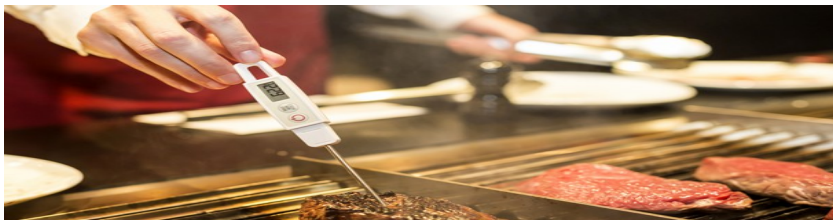
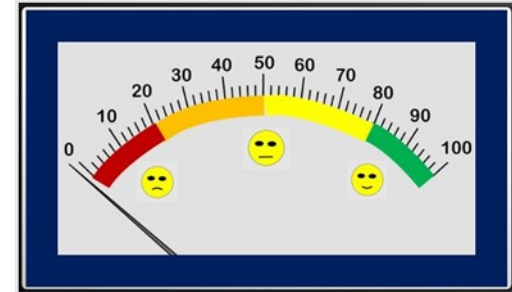


Record examples are:

Outcome of CCP monitoring activities;

Observed deviations and executed corrective actions;

Outcome of verification activities.





Documents and records should be kept for a sufficient period of time beyond the shelf-life of the product for traceability purposes and allow the Competent Authority to audit the HACCP-based procedures.



Principle 7: documentation and record keeping



Records should be kept for an appropriate period of time.

That period must be long enough to ensure information will be available in case of an alert that can be traced back to the food in question, e.g. two months after the date of consumption, if such a date exists.

For certain foods the date of consumption is certain, e.g. in the case of food catering consumption takes place shortly after the time of production.



Principle 7: documentation and record keeping



For food for which the date of consumption is uncertain, records should be kept for a reasonably short period after the expiry date of the food.

Records are an important tool for the Competent Authorities to allow verification of the proper functioning of the food businesses' FSMS.





Time for keeping records

Highly perishable foodstuffs with use less than 3 months or no date (fruit, vegetables and not pre packaged), destined directly to the final consumer should be kept for 6 months after the date of manufacturing or delivery.

For other products with a "best before" date, records could be kept for the period of the shelf-life plus 6 months.



Time for keeping records

General rule – 5 years

No expiration date - 5 years

To date more than 5 years validity period + 6 months

This 5-year period, where applied from the date of manufacturing or delivery to traceability records, would be likely to meet the objective of Article 18 (Traceability).



Principle 7: documentation and record keeping



**REGULATION (EC) No 178/2002 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
of 28 January 2002**

**laying down the general principles and requirements of food law, establishing the European Food
Safety Authority and laying down procedures in matters of food safety**

26 January 2010

**GUIDANCE ON THE IMPLEMENTATION OF ARTICLES 11, 12, 14, 17, 18, 19
AND 20 OF REGULATION (EC) N° 178/2002 ON GENERAL FOOD LAW**

**CONCLUSIONS OF THE STANDING COMMITTEE ON THE FOOD CHAIN
AND ANIMAL HEALTH**

Principle 7: documentation and record keeping



A simple record-keeping system can be effective and easily communicated to employees.

It may be integrated into existing operations and may use existing paperwork, such as delivery invoices and checklists to record, for example product temperatures.





FLEXIBILITY WITH REGARD TO THE HACCP PRINCIPLES

General rule, the need for HACCP-related record keeping should be well- balanced and can be limited to what is essential with regard to food safety. It is important to consider that recording is necessary but it is not the goal itself.

Where a generic HACCP guide exists, it can substitute individual documentation on HACCP-based procedures. In the case of visual monitoring procedures, it may be considered to limit the need for establishing a record only to measurements of non-compliance (e.g. failure of equipment to maintain the correct temperature) that are detected.



FLEXIBILITY WITH REGARD TO THE HACCP PRINCIPLES

Carrying out monitoring effectively is more important than recording it. Therefore, flexibility on recording the recording could be more easily accepted than flexibility on monitoring itself (e.g keeping the right temperature is more important than recording it).

The use of a diary or a checklist might be a suitable way of record keeping. FBOs can simply tick boxes to indicate how they act or provide more detailed information by writing in text boxes how they comply with a safety point. An x-weekly of methods review only requires completing a check list of activities and possible impact on food safety.



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- ➔ Documentation and record keeping are there to demonstrate the effectiveness of the HACCP-plan and implementation.
- ➔ In the first place for the FBO, but also to external parties, like customers, consumers, certifying bodies or competent authorities.
- ➔ The documentation helps to trace the history of the manufacturing.
- ➔ The records help to identify trends.
- ➔ By using this data a good review and action plan can be made.
- ➔ There are guidelines for the time to save data and records, the general rule is 5 years.
- ➔ Flexibility on documentation and record keeping is a very useable possibility for small and medium enterprises.



Project e-mail: foodsafetyprojectTCc@gmail.com

THANK YOU FOR YOUR ATTENTION

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implemented by NSF Euro Consultants Consortium*