Principle 7:
Recordkeeping Procedures

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Feed Industry HACCP

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

- Summary of the hazard analysis
- HACCP plan
- Support documentation
- Daily operational records

NACMCF-endorsed

FSMA Rules for Animal Feed

- Written food safety plan, including the written hazard analysis, preventive controls, monitoring procedures, corrective action procedures, verification procedures, and recall plan

§507.55 – Implementation records

(2) Records that document the monitoring of preventive controls

(3) Records that document corrective actions

(4) Records that document verification related to: validation, monitoring, corrective action, calibration of process monitoring and verification instruments, product testing, environmental monitoring, records review, and reanalysis (i-viii)

(5) Records that document the supply-chain program

(6) Records that document applicable training for the QI

Recordkeeping: Hazard Analysis Summary

- 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

Recordkeeping: HACCP Plan

- List of the HACCP team and assigned responsibilities
- Description of the food, its distribution, intended use, and consumers
- Verified flow diagram for the entire manufacturing process with CCPs indicated
- HACCP plan Summary Form

Recordkeeping: 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

Recordkeeping: Daily Operational Records

- Monitoring records
- Corrective action records
- Verification records

Documentation Management

- Documentation proves that the product that is produced is safe
- Improper documentation will cause doubt about ability to manage product safely

Recordkeeping 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

Recordkeeping 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 confusion

Recordkeeping: Employee Training

Train employees

- Monitoring procedures
- How to record data
- Which form to use
- CLs associated with CCPs
- CA procedures

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

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Subpart F – Requirements applying to records

- Records must be retained for at least 2 years
- The owner, operator, or agent in charge of the facility must sign and date the food safety plan
- Except for the food safety plan, offsite storage or records is permitted, if such records can be retrieved and provided onsite within 24 hours
- Existing records (e.g. records kept to comply with other Federal, State, or local regulations) do not need to be duplicated if they contain all of the required information and satisfy the requirements of this subpart

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Subpart F – Requirements applying to records (cont.)

- All records must be made promptly available
- Records must be kept as original records, true copies, or electronic record; contain actual values and observations obtained during monitoring and verification; be accurate, indelible, and legible; be created concurrently with performance of the activity documented; be detailed
- Must include information to identify the plant or facility, date, signature/initials, identity of the product and lot code

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Record Keeping and Verification

Processing category – Cattle medicated feed

Process step/CCP	Hazard	Record	Responsibility	CCP Verification
Bulk Receiving	Prohibited animal protein	- Cleanout certificate from carrier - Bill of lading from supplier - Product labeling - Letter of guarantee - Receiving log - Approved supplier list - Record of testing (test strips) - Training log (for purchasing personnel if product from non-approved supplier)	- Receiving employee - Receiving employee - Receiving employee - Purchasing - Receiving employee - Purchasing - Production supervisor - Quality assurance manager	**Short term** Daily review of receiving log and paperwork by QA/QC department **Long term** Operational audit performed by designated management personnel to make sure Receiving Bulk Ingredients SOP is followed

Approved: _____ **Date:** _____

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HACCP Plan Summary Form

Processing category – Cattle medicated feed

Process step and CCP	Hazard	Critical Limits for each CCP	Monitoring				Corrective Action	Verification Activities	Recordkeeping Procedure
			What	How	Frequency	Who			
Bulk Receiving Pit, CCP #1	Prohibited animal protein	Zero tolerance	Cleanout certificate for carriers; bill of lading from supplier; product labeling Letter of Guarantee (LOG) from supplier Presence of prohibited animal protein	Visual observation of docu-mentation Purchase only from approved supplier	Every load received into the facility	Receiving employee	Reject load in the absence of documentation, test failure, or non-approved supplier Notify supplier that documentation must be received at delivery Potential removal of supplier from Approved Supplier List Training of purchasing personnel if product purchased from non-approved supplier and appropriate disciplinary action	Daily review of receiving log and paperwork by QA/QC dept. Operational audit performed by designated management personnel to ensure Receiving Bulk Ingredients SOP is followed	Receiving Bulk Ingredients SOP Cleanout certificate from carrier Bill of lading from supplier Product labeling LOG from supplier Receiving log Approved supplier list Record of testing (test strips) Training log

Approved: _____ **Date:** _____

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