

## Monitoring

The regulation that applies to monitoring is:

**9 CFR 417.2(c)(4)**—*List the procedures, and the frequency with which those procedures will be performed, that will be used to monitor each of the critical control points to ensure compliance with the critical limits*

You will verify the monitoring requirement by performing the HACCP 01/02 procedures. You could use either the recordkeeping or review and observation component, or both.

The thought process you should use when verifying regulatory requirements includes:

- gathering information by asking questions;
- assessing the information; and
- determining regulatory compliance.

This thought process should be utilized when verifying all of the regulatory requirements. The diagrams on the following pages illustrate the thought process.

### Gather information by asking questions

Verify the regulatory requirements for monitoring by reviewing the HACCP plan, reviewing HACCP records, observing establishment employees performing monitoring activities, and taking measurements at CCPs. When verifying the monitoring requirements, seek answers to the following questions:

1. Does the HACCP plan list the monitoring procedures and frequencies that are used to monitor each of the critical control points to ensure compliance with the critical limits?
2. Are the monitoring procedures being performed as described in the HACCP plan?
3. Are the monitoring procedures being performed at the frequencies for the CCPs listed in the HACCP plan?
4. Are the critical limits met?

### Assess the information

To answer these questions you should:

- Review the HACCP plan
- Review the HACCP monitoring records
- Observe the establishment employees perform monitoring activities
- Take measurements at critical control points

Now let's review each of these activities in detail.

### **Reviewing the HACCP Plan**

When reviewing the establishment's HACCP plan for raw processes, you will determine whether it includes the monitoring procedures and frequencies that are used to monitor each critical control point. It is very important for you to be familiar with the monitoring procedures and frequencies in the current HACCP plan. You should review the HACCP plan each time the monitoring requirement is verified since the establishment can modify the plan without notifying inspection. When reviewing the monitoring procedures and frequencies in the HACCP plan, the CSI should be able to visualize what is occurring at the CCP. If the CSI cannot visualize what is occurring at the CCP, it could be an indication that the monitoring requirement is not being met.

***Monitoring Example 1:*** You are performing the 03J01 procedure and have randomly selected to verify the monitoring requirements for the steam pasteurization CCP. You review the establishment's HACCP plan and find that it specifies monitoring personnel will observe and record the temperature as measured by the steam pasteurization cabinet gauges. The plan states that this monitoring procedure is to be performed hourly. Based upon your review of the plan, you decide the monitoring procedures and frequencies for this CCP are included in the HACCP plan.

### **Reviewing HACCP Monitoring Records**

You may decide to use the recordkeeping component to verify the monitoring requirement to determine if the establishment is performing the monitoring procedures at the frequency specified in the HACCP plan for raw processes.

***Monitoring Example 2:*** You are performing the 03J01 procedure and have randomly selected to verify the monitoring requirements for the steam pasteurization CCP. Reviewing the records, you find that monitoring personnel have recorded temperatures hourly as per the HACCP plan for this CCP. You determine that the establishment's monitoring recordkeeping for this CCP is in compliance.

## Observing Establishment Employees

You should observe an establishment employee performing HACCP monitoring activities in the raw process to determine whether the procedures are being carried out as written in the HACCP plan.

**Monitoring Example 3:** *You are performing the 03J01 procedure and have randomly selected to verify the monitoring requirements for the steam pasteurization CCP. You observe the establishment monitoring personnel as they make the temperature determinations and document them on the records for the steam pasteurization CCP. From your observation, you determine that the establishment is in compliance with the monitoring procedure as it is described in the HACCP plan.*

## Taking Measurements at Critical Control Points

You may also take measurements at certain critical control points in the raw process.

**Monitoring Example 4:** *Continuing the 03J01 procedure from the above example, you proceed to the temperature gauges on the steam pasteurization cabinet and take a reading. You then compare your temperature reading with the temperature that was recorded by the establishment monitoring personnel. You determine that the establishment is in compliance because your temperature reading is within the critical limits and compares with the reading as recorded by establishment monitoring personnel.*

## Determine Compliance

After you have gathered and assessed all available information pertaining to the monitoring requirement, you must determine regulatory compliance. If you find that the establishment has met all regulatory requirements, then there is no regulatory noncompliance. If you find that the establishment has not met all regulatory requirements, there is noncompliance. You will receive more information about making compliance determinations in a later section.

## Noncompliance with the Monitoring Requirement

The following are examples of noncompliance with the monitoring requirement.

- 1. The HACCP plan specifies that monitoring personnel will examine 20 poultry carcasses for visible fecal contamination off-line at the pre-chill inspection station every hour. While performing verification for the monitoring requirement, you observe that the procedure is being performed on-line with only 10 carcasses per hour. **The establishment is***

**not conducting the monitoring procedures as specified in the HACCP plan.**

*2. The HACCP plan specifies that the concentration of the organic acid beef carcass rinse will be monitored hourly by establishment personnel and recorded in the Pathogen Reduction Logbook. You review the logbook and find that the monitoring checks were recorded every 2 hours. Upon further inquiry, you determine that the monitoring checks were actually being performed every 2 hours. **The establishment is not performing the monitoring procedures at the frequencies specified in the HACCP plan.***

*3. The HACCP plan specifies that the concentration of the Trisodium Phosphate (TSP) rinse will be maintained at a minimum of 8 percent. You observe the concentration gauge on the TSP equipment and find that it reads 6 percent. **The critical limit for the CCP is not met.***

You will document any noncompliance in accordance with our discussion of documentation and enforcement in a later section using a logical thought process to arrive at a sound, supportable conclusion

1. Verify that requirement for that CCP
2. Determine which component to perform
3. Select one or more CCPs to verify
4. Randomly select the requirement to verify