

Noncompliance Classification (Trend) Indicators

Monitoring Trend Indicator

Use the monitoring trend indicator when you determine that there is noncompliance with the monitoring requirement. Mark this trend indicator when

- The plant is not monitoring the critical limit at the frequency stated in the HACCP plan.
- The plant is not monitoring the critical limit using the procedures described in the HACCP plan.
- You find a deviation from the critical limit that the plant has no way of detecting. (For example, you verified the monitoring requirement by taking a cooked product temperature of patties coming out of the cooking unit. You find that the critical limit is not met.)
- If you find a noncompliance that is attributed to an unforeseen hazard, document the noncompliance under HACCP monitoring, because the plant was not monitoring sufficiently to discover such a hazard on its own (monitoring was not sufficient to demonstrate process control).

Plant Verification Trend Indicator

Use the plant verification trend indicator when the plant is not conducting the verification activities

- As described in the HACCP plan, or
- At the frequencies described in the HACCP plan.

You also use the plant verification trend indicator when a RTE sample is positive for a pathogen.

Corrective Action Trend Indicator

The corrective action trend indicator is used when a deviation or an unforeseen hazard occurs, and the plant's corrective action does not meet the regulatory requirements. Also use the corrective action trend indicator if the corrective actions taken in response to a deviation from a critical limit did not

- Appropriately address, identify and eliminate the cause of the deviation.
- Include measures to ensure that the CCP is under control.

- Include measures to prevent the deviation or unforeseen hazard from recurring.
- Include appropriate disposition of the product.

Note: For this trend indicator, only document a plant's failure to meet the corrective action requirements of 9 CFR 417.3. If the plant finds the deviation or unforeseen hazard and takes the corrective action necessary to meet the regulatory requirements, there is no noncompliance.

Recordkeeping Trend Indicator

Use the recordkeeping trend indicator when the

- Monitoring records do not include the actual times, temperatures, or other quantifiable values; the calibration of process-monitoring instruments; corrective actions; verification procedures and results; product identity; signature or initials of the person making the entry; or the date the record is made.
- Plant does not have the decision-making documents associated with selecting and developing CCPs and critical limits, or documents supporting both the monitoring and verification procedures and frequencies.
- Plant did not conduct a pre-shipment review.
- Plant is not retaining HACCP records for the required length of time.