

Verifying a Hazard Analysis

You should verify that an establishment has performed a hazard analysis as part of basic compliance with the regulations (9 CFR 417.2(a)) during the performance of the **03A01 procedure**. Perform this procedure when a new establishment comes under inspection and whenever an existing establishment adds a new HACCP plan. You can use the Basic Compliance checklist (FSIS Form 5000-1) to assist in assessing compliance with Part 417.

You should use the regulatory thought process and methodology when verifying the hazard analysis. Seek the answers to the following questions.

1. Did the establishment conduct a hazard analysis or have one conducted for it?
2. Did the establishment's analysis start by identifying all hazards that may occur?
3. Does the hazard analysis identify preventive measures the establishment can apply to the food safety hazards?
4. Does the hazard analysis include a flow chart that describes (diagrams) the steps of each process and production flow in the establishment?
5. Does the hazard analysis identify the intended use or the consumers of the finished product?
6. Does the result of the establishment's hazard analysis reveal that one or more food safety hazards are reasonably likely to occur?
7. Does the establishment have a written HACCP plan for each of its products?
8. Has the establishment conducted validation activities to determine if a HACCP plan can function as intended?

Note that Section 417.4(a)(1) provides more detail about the requirement for initial validation. "...The establishment shall conduct activities designed to determine that the HACCP plan is functioning as intended. During this HACCP plan validation period, the establishment shall repeatedly test the adequacy of the CCPs, critical limits, monitoring and recordkeeping procedures, and corrective actions set forth in the HACCP plan." Validation data for any HACCP plan must include some practical data or information reflecting an establishment's actual experience in implementing the HACCP plan. This is necessary because validation must demonstrate not only that the HACCP plan is theoretically sound, but also that the establishment can implement it and make it work on a day-to-day basis.

9. Do the establishment's records include multiple results that verify the monitoring of CCPs and conformance with critical limits?

10. Does the establishment have subsequent results that support the adequacy of corrective actions in achieving control at a CCP after a deviation from a critical limit has occurred?