September 29, 2015

Hazard Analysis & Critical Control Points (HACCP) Plan Review Checklist

CONTENTS OF HACCP PLAN

HACCP Plan must be specific and limited to the proposed Reduced Oxygen Packaging (ROP) process.

1. **Cover letter** - Describe the proposed ROP process and must include name and physical address of the food establishment(s) with single point of contact information.

2. **Subject foods** - Complete list of all foods to be prepared via the Reduced Oxygen Packaging (ROP): Cook-Chill or Sous Vide method, modified atmosphere packaging (MAP), controlled atmosphere packaging (CAP), Curing Food, using Food Additives, or Smoking.

3. **List of ingredients, materials, and equipment used in the preparation of each food(s).**

4. **Flow Diagram and/or Hazards Analysis Table** - For each specific food or category type, identify each step of the ROP process, identifying Critical Control Points and corresponding Critical Control Limits, potential safety concerns (chemical, biological and physical) and corrective action to be taken when Critical Control Limits are not achieved.

5. **Training plan** - Food employee and supervisory training plan addressing food safety concerns during the ROP. Description of the specific training for safety and control, equipment calibration (Example: Thermometers), including signed training logs.

CRITICAL CONTROL POINTS, CRITICAL CONTROL LIMITS, STANDARD OPERATING PROCEDURES, CONTROLS, MONITORING & RECORD-KEEPING

Standard Operating Procedures must be provided in the form of a narrative description and include a step by step description of the following items:

6. **Critical Control Points (CCP)** - Each Critical Control Point; e.g., cold holding, cooking, cooling. Include reheating and hot holding as Critical Control Points if
the product is to be held hot until serving.

7. **Critical Limits (CCL)** - Must provide established Critical Limits for each Critical Control Point; e.g., cold holding temperature, cooking temperature, cooling time and temperatures, reheating and hot holding (if applicable) time and temperatures, etc.

8. **Monitoring and control** - Specific method and frequency of monitoring for each Critical Control Point by the designated food employee(s) as determined by the person in charge. How will the process be monitored and controlled by the employee? Where proposed, specify the use of record logs/charts.

9. **Oversight/verification of employee monitoring - Person In Charge (PIC)** - Specific method and frequency by which the person in charge will routinely verify the designated food employee is following standard operating procedures and monitoring Critical Control Points. How will management verify this process is being performed in compliance with established standard operating procedures? Where proposed, specify the use of record logs/charts.

10. **Corrective action/response plan when Critical Limits not met** - Course of action taken by the PIC if Critical Limits for each Critical Control Point are not met. What corrective actions are to be taken if the process is performed incorrectly, specific to each step of the process.

11. **Initial Cooling** - Bagged foods must be cooled to 41°F using the standard cooling parameters; i.e., 135°F to 70°F in two hours and 70°F to 41°F within the next four hours.

12. **Cooling/cold holding/holding time** - Specify which cooling/cold hold temp/holding time options is proposed:

   - **FDA Food Code 2013:**
     - Cooled from 41°F to 34°F within ≤ 48 hours: Hold at 34°F ≤ 30 days after date of packaging.
     - Held at ≤ 41°F for no more than 7 days.
     - Held at ≤ 41°F, Labeled with time and date, and removed from package in the food establishment ≤ 48 hours after packaging. (*No HACCP Plan Required.*)

   **NOTE:** Freezing has no shelf life restriction: Record freeze & thaw dates.

13. **No bare-hand contact statement** - Specific reference that bare-hand contact of RTE foods is prohibited throughout the ROP Process.

14. **On-site consumption statement** - Specific reference that foods prepared using the ROP process will be used/consumed on-site and will not be sold for off-site consumption or distributed to another business entity.

15. **Labeling of Cook-Chilled or Sous Vide bags** - Provide a copy of the labeling to be used on Cook-Chilled or Sous Vide bags in accordance with the; i.e., "keep refrigerated" statement, product name and package date.

16. **Discard and no re-use/re-chill statement** - Specific reference that foods will be discarded upon expiration of shelf-life (hold time), no re-use of ROP foods is allowed once opened, and foods may not be re-chilled for additional shelf life.

17. **Records maintenance and retention** - Record logs/charts used to document the monitoring of all procedural steps and critical control limits throughout the ROP.
process; e.g., monitoring of all cooling and cold-holding temperatures, must be maintained on-site. Record logs/charts must be retained on-site for a minimum of 6 months.

ADDITIONAL NOTES:

• Except for FISH that is frozen before, during, and after PACKAGING, a FOOD ESTABLISHMENT may not PACKAGE FISH using a REDUCED OXYGEN PACKAGING method.
• Foods must be placed in a package with an oxygen barrier and sealed before Cooking, OR placed in a package and sealed immediately after Cooking at a temperature of 135° F or higher.
• The cooling of food to 70° F prior to bagging is not considered Cook-Chill. (Quality)
• Additional scientific data or technical documentation may be required which demonstrates food safety is not compromised by the proposal.
• Foods prepared using the ROP process proposed may be distributed to another physical address(s) of the same business entity; however, Control Limits (including times and temperatures) must be monitored and maintained during transport. Monitoring records of time and temperature during transport must be maintained on-site at its final destination and retained for a minimum of 6 months.