Food Safety Management (HACCP) Booklet

- ISO22000 - Food safety management systems – Requirements throughout the food chain

- NCSI HACCP Certification Criteria
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SUMMARY

NCS International offers clients two types of HACCP certification. Food and agricultural businesses are able to select the appropriate level of HACCP certification to meet their internal and market requirements. This NCS International publication outlines the requirements for certification to each of NCS International’s Food safety management (HACCP) standards.

**ISO 22000 Food safety management systems – Requirements throughout the food chain**

ISO 22000 is an international standard which was published in September 2005 that specifies the requirements for Hazard Analysis Critical Control Point (HACCP) food safety management systems in organisations involved in the production, processing, transport or distribution of food products.

This type of certification is suited to businesses which require international recognition of their food safety management system.

The ISO 22000 standard integrates the principles of HACCP developed by the Codex Alimentarius Commission and described in *Hazard Analysis Critical Control Point (HACCP) System and Guidelines for its Application*, with prerequisite programs (PRPs), into an auditable management system standard.

**NCSI HACCP Certification Criteria**

NCSI has developed HACCP criteria for food producers, manufacturers and food service organisations that do not require international recognition of their food safety management system, but which need to demonstrate to their suppliers and customers that they have implemented a system of food safety hazard controls based on the principles and practice outlined in *Hazard Analysis Critical Control Point (HACCP) System and Guidelines for its Application*, issued by the Codex Alimentarius Commission.
2.1 ISO 22000 FOOD SAFETY MANAGEMENT SYSTEMS – REQUIREMENTS THROUGHOUT THE FOOD CHAIN

ISO 22000 is the international standard that specifies the requirements for Hazard Analysis Critical Control Point (HACCP) food safety management systems in organisations involved in the production, processing, transport or distribution of food products.

This type of certification is suited to businesses which require international recognition of their food safety management system.

ISO 22000 specifies the key elements for a food safety management system including:

- Interactive communication along the food chain;
- A system management structure that is incorporated into the overall management of the organisation;
- Prerequisite (sometimes referred to as GMP) programs that underpin the organisation’s food safety management system, and
- A HACCP system based on Codex principles

The ISO 22000 standard specifies the requirements that enable an organisation:

a) to plan, implement, operate, maintain, and update a food safety management system aimed at providing products that, according to their intended use, are safe for the consumer,
b) to demonstrate compliance with applicable statutory and regulatory food safety requirements,
c) to evaluate and assess customer requirements and demonstrate conformity with those mutually agreed customer requirements that relate to food safety, in order to enhance customer satisfaction,
d) to effectively communicate food safety issues to their suppliers, customers and relevant interested parties in the food chain,
e) to ensure that the organisation conforms to its stated food safety policy,
f) to demonstrate such conformity to relevant interested parties, and

g) to seek certification or registration of its food safety management system by an external organisation, or make a self-assessment or self-declaration of conformity to this international standard.

The ISO 22000 is intended to address aspects of food safety only, although the approach outlined in the international standard can also be considered to address other food specific aspects such as quality and ethical issues.

Organisations seeking certification to ISO 22000 should first acquire a copy of the international standard and implement a food safety management system that meets this standard. The standard can be acquired from the International Standards Organisation through their web-site www.iso.org or other international Standards organisations.

1. Hazard Analysis Critical Control Point (HACCP) System and Guidelines for its Application, Codex Alimentarius Commission, Alinorm 97/13A, Appendix II
2. ISO 22000-2005: Food safety management systems – Requirements for any organisation in the food chain

2.2 NCSI HACCP Certification Criteria

NCS International has also developed HACCP criteria for food and agricultural organisations which do not require international recognition of their food safety management system, but which need to demonstrate to their suppliers and customers that they have implemented a management system based on the principles and practice outlined in Codex HACCP.

NCS International’s HACCP System Criteria requires that the organisation considers and controls all food safety hazards that could affect the products or services that are produced, stored, or supplied to another part of the food supply chain. It includes all potential food safety hazards at every step in every process.

The organisation may also wish to consider quality hazards, or include environmental, occupational health and safety, or other risk considerations. These may be covered by other standards, or included within the HACCP System. However if for example, hazards that are related to the quality of the product are included in the scope, they are expected to be incorporated throughout the organisation's HACCP system.

In addition to the requirements set out in this system, the organisation is first required to ensure that it meets its food safety obligations in terms of relevant legislation, standards, codes of practice, guidelines and industry standards.

If there is a discrepancy between the requirements of the NCSI HACCP Criteria and those of any relevant legal requirement, then the legal requirement(s) override the criteria outlined in this document.

2.3 References

For certification to ISO 22000, the reference standards are:

- ISO/CD 22003: Food safety management systems – Requirements for any body providing audit and certification of food safety management systems. International Standards Organisation (draft only – distributed for comment)

For certification to either ISO 22000 or the NCSI HACCP Criteria, the organisation is required to...
implement a HACCP system based on Codex Guidelines:

- **Hazard Analysis Critical Control Point (HACCP) System and Guidelines for its Application**, issued by the Codex Alimentarius Commission of the World Health Organisation (WHO) and Food & Agriculture Organisation (FAO) of the United Nations (Alinorm 97/13A, Appendix II) ([www.codexalimentarius.net](http://www.codexalimentarius.net)).

Organisations are also required to meet their local food safety regulations. Within the Australian food industry, this means the requirements of the following Australian Food Standards (as applied within each state and territory):

- Standard 3.2.1 of the Australian Food Standards Code – *Food Safety Programs*
- Standard 3.2.2 of The Australian Food Standards Code - *Food Safety Practices & General Requirements.*
- Standard 3.2.3 of the Australian Food Standards Code - *Food Premises and Equipment*

These Standards are available from Food Standards Australia and New Zealand (FSANZ) and can be downloaded from the FSANZ web-site [www.foodstandards.gov.au](http://www.foodstandards.gov.au).

### 3.4 Multi-site Organisations

Certification to NCSI HACCP Criteria is generally site specific and only covers the sites, products and process identified in the scope of your organisation’s Food Safety Management System. This is due to the fact that HACCP plans and PRPs are required to be site-specific.

However NCSI does allow for assessment and certification of multi-site organisations where all sites are operating under one centrally managed HACCP food safety management system, the product scope and activities are the same at each site, and the organisation is seeking only a single certificate covering the whole organisation.

For applicable multi-site organisations, a document review is completed at least annually (as part of the surveillance audit), and a sample of sites is audited at each certification and surveillance audit, according to the following schedule:

<table>
<thead>
<tr>
<th>Number of sites</th>
<th>Sample Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 5</td>
<td>100%</td>
</tr>
<tr>
<td>6 to 7</td>
<td>4</td>
</tr>
<tr>
<td>8 to 11</td>
<td>5</td>
</tr>
<tr>
<td>12 to 19</td>
<td>40% (min 6)</td>
</tr>
<tr>
<td>20 to 29</td>
<td>30% (min 8)</td>
</tr>
<tr>
<td>30 to 40</td>
<td>25% (min 9)</td>
</tr>
<tr>
<td>over 40</td>
<td>20% (min 10)</td>
</tr>
</tbody>
</table>

For ISO 22000, refer to ISO/TS 22003 for guidance audit frequency for multi-site certifications.

NCS International reserves the right to increase the sampling regime in accordance with food safety risk.
This section describes the criteria required to be implemented by organisations who are only seeking certification to NCSI HACCP Criteria.
9. **HACCP CERTIFICATION CRITERIA**

9.1 **Hazard Analysis Critical Control Point (HACCP) System**

9.1.1 **Introduction to the NCSI HACCP Certification Criteria**

The NCSI HACCP Certification Criteria have three principle components. The first concentrates on Management System requirements which contain those elements common to any good management system - food safety policy, organisational structure and responsibilities, documentation control procedures. The second element is the requirement for the development of a HACCP Plan based on the seven principles of HACCP as developed by the Codex Alimentarius Commission. The third element of the system is for procedures which are collectively known as prerequisite programs, support programs, Good Manufacturing Practices (GMP), or Good Hygiene Practices (GHP), and include elements such as staff hygiene policies, approved supplier programs, cleaning programs, recall procedures and the like.

The benefits to your food business of implementing a HACCP Food Safety System are numerous. HACCP based food safety systems are a legal requirement for many food businesses and trade with major food retailers is often dependent upon organisations having HACCP based food safety systems in place.

Certification of a HACCP Food Safety System is not a guarantee by NCS International of an organisation’s food safety performance, or that there will be no food safety hazards caused by the certified organisation, or that legislative requirements and food safety standards and codes of practice will always be met. Certification is a statement of compliance with these *NCSI HACCP Criteria* at the time of certification, and a statement of the assessed overall ability of the organisation to identify and control potential food safety hazards.

Ultimately, the food safety performance of, and value which is added to, your organisation with a HACCP Food Safety System certified by NCS International is dependent on the efforts made by your business to establish and maintain a HACCP system that meets your legal and industry requirements, complies with the HACCP Criteria, and demonstrates your organisation’s commitment to continuously improve your food safety performance.

9.2 **Management System Requirements**

Your organisation shall develop, document and implement the following management system elements to support your HACCP Food Safety System:

9.2.1 **Food Safety Policy**

Your organisation shall develop and support a policy which states the business intent and objectives for the supply of safe products that meet customer expectations and legal requirements. The policy shall outline the business’ commitment to continuous improvement, be signed by the senior executive manager, and be communicated to all staff within the business.

9.2.2 **Organisational Chart & Job Descriptions**

A current and accurate organisational chart shall be available which identifies all the management and staff positions within your organisation.

Position descriptions shall be available for all positions on the organisational chart which have responsibility for food safety and maintenance of the HACCP system.

9.2.3 **Description of How the System Works**

Your organisation shall provide a written description of the documents that are included in the HACCP Food Safety System where documents and records are kept, and the processes in place to implement the Food Safety System and their inter-relationship.

9.2.4 **Document Control**

Your organisation shall prepare a written procedure on how all documents within the HACCP System are controlled to ensure only the most current and authorised version is available to all staff.

9.2.5 **Document Register**

A list of all the documents that are included in the HACCP System shall be developed. The register shall include documents describing:

- Product Description & Intended Use,
- Hazard Analysis, including Risk Assessment;
- HACCP Audit Table,
- Specifications,
- Recipes, Procedures,
- Prerequisite programs,
- Policies, Forms,
- Work Instructions.

The date and/or version number shall be indicated within each document.

Your organisation should also retain and control external documents required to maintain the system including relevant industry standards, or guidelines, regulations, recall protocols, etc

An amendment register shall be maintained where any amendments are made to the documents listed in the documents register.

9.2.6 **HACCP Food Safety Management System Review**

The HACCP System shall be reviewed at least annually, including the Food Safety Policy,
organisational chart, document control (refer 9.2.4), verification activities (refer 9.6), and pre-requisite programs.

In addition to the annual review, the HACCP System shall be reviewed where any changes occur which could potentially introduce change to the content or application of the HACCP System.

Records shall be maintained of management system reviews.

9.3 Preliminary Steps
(Steps 1-5 of Codex HACCP)
Your organisation shall develop, document, and implement a HACCP Plan based on Codex Principles, and as outlined in the Application section of the Codex guideline. The HACCP Plan shall consider all food safety hazards, as well as quality and other hazards where included in the scope (refer 9.3.2)

The following reflects steps 1-5 of the Codex HACCP Guideline and shall be included as part of this process.

9.3.1 The HACCP Team
(Step 1 of Codex HACCP)
The organisation shall identify and document the members of the HACCP team, who are those within the business that have the process skills and knowledge to develop and maintain the HACCP Plan. At least one HACCP team member, who also has operational accountability within the organisation, shall be competent in the application of HACCP systems and have attended a competency-based and assessed training course in the application of HACCP Principles, or equivalent.

9.3.2 Scope and Purpose of your HACCP Plan
(Step 1 of Codex HACCP)
The scope of the HACCP Plan shall be defined and documented, including the start and end point of the process(es) under consideration within the HACCP Plan. The purpose of the HACCP Plan shall be defined and documented. The purpose shall include the intent that all food safety hazards will be identified and controlled.

If you also wish to cover quality, environmental, occupational health and safety, or other risk considerations within the scope of your HACCP System, they shall also be included throughout your HACCP Plan.

9.3.3 Product Description and Intended Use.
(Steps 2, 3 of Codex HACCP)
A Product Description shall be developed and documented for all products included within your product scope. ‘Like’ products that are processed in similar ways may be grouped together in the one Product Description. Products that are processed differently require a separate Product Description. Each Product Description shall cover the following criteria:

- Description of product
- Composition
- Physical/chemical structure
- Microcidal/static treatment including method of preservation
- Packaging – primary & secondary
- Storage, handling & distribution methods
- Shelf life
- Intended Use of the product(s);
- Labelling requirements (as per Food Standards Code)
- Sensitive consumers

If your organisation already has finished product specifications that cover the same information as outlined above, then the specifications may satisfy this requirement.

9.4 Hazard Analysis Table
9.4.1 Hazard Identification, Analysis and Control
(Step 6, Principle 1 of Codex HACCP)
A hazard analysis shall be undertaken and documented at each step of the process as identified in the flow diagram (refer 9.3.4). At each step, all possible food safety (and quality) hazards shall be considered and documented, and the cause of the hazard should also be documented.

Once all hazards have been identified, a risk assessment shall be undertaken to determine which hazards are significant for your organisation and which ones are not. Significance is to be determined by comparing severity of the hazards against the likelihood of the hazard occurring.

It is recommended that a table format be implemented to capture the Hazard Analysis information using the following column headings:

1. Step
2. Hazard
3. Cause of Hazard
4. Severity
5. Likelihood
6. Significance
7. Control Measure(s)
There is no specific methodology required to be used to determine significance. Your organisation may develop the method or utilise one of the standard textbook methodologies. However once determined, the method shall be applied consistently throughout the HACCP Plan and shall be referenced.

For all hazards that are determined to be significant, at least one control measure shall be determined to prevent it from occurring or reduce it to an acceptable level.

### 9.4.2 Determining Critical Control Points
(Step 7, Principle 2 of Codex HACCP)

A Critical Control Point (CCP) is a step in the process at which control shall be applied to eliminate a food safety hazard or reduce it to an acceptable level. A CCP is an action taken as part of the process flow, and may not be a control measure as already identified.

There is no limit to the number of CCPs in a process and it will vary considerably according to the complexity of the process and equipment, the type of raw materials/ingredients you use, and your finished product.

There is no specific methodology required to be used to determine CCPs. Your organisation may develop the method or utilise the Codex HACCP decision tree\(^3\). However the CCP determination shall identify all the process steps where control is necessary to eliminate or reduce a food safety hazard, and shall be applied consistently to all process steps.

### 9.5 HACCP Audit Table

A HACCP Audit Table\(^3\) shall be developed, documented and applied which includes each step of the process(es). It shall list all the CCPs (or QCPs to control quality hazards) identified in the Hazard Analysis, and shall include the following requirements:

#### 9.5.1 Establish Critical Limits
(Step 8, Principle 3 of Codex HACCP)

For all CCPs, critical limits shall be established and documented in the HACCP Audit Table. Critical Limits\(^4\) establish the difference between safe and unsafe (good quality and poor quality product). If the critical limit for a CCP is exceeded a hazard may exist.

Where critical limits are not available through industry standards, legislation, codes of practice or published research, it is the responsibility of your organisation to undertake a validation study to ensure said limits will control the significant hazard. Validation data shall be documented and maintained by your organisation.

#### 9.5.2 Monitoring of CCPs
(Step 9, Principle 4 of Codex HACCP)

Your organisation shall document how each CCP (and QCP) is to be monitored to ensure it is within the critical limits that have been set.

Monitoring procedures shall define what is being monitored, how the monitoring is done, the frequency of the monitoring, where the monitoring is to be undertaken and who is responsible for undertaking the monitoring.

When determining the frequency of monitoring, it shall be sufficient to ensure that the CCP is under control.

Your organisation shall also ensure that staff who conduct monitoring checks are trained in the correct method and that training is assessed and documented (refer also 9.7.5)

Records of monitoring of CCPs shall be maintained and be signed by the person responsible for the monitoring and by a responsible reviewing officer.

#### 9.5.3 CCP Corrective Actions
(Step 10, Principle 5)

CCP Corrective Actions shall be developed, documented and implemented that define the action(s) to be taken when monitoring reveals that the critical limits have not been met\(^5\).

The procedures shall state what action is to be taken regarding the affected product and what procedures are undertaken to determine the root cause of the problem and prevent it’s recurrence.

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\(^3\) To assist in finding where the correct CCPs are, your business can use a CCP Decision Tree. (refer Codex HACCP) A decision tree consists of a logical series of questions which you can ask for each hazard at each step in your flow chart. Using a decision tree encourages structured thinking, ensures a consistent approach, encourages discussion amongst team members and hence a better understanding of the process and the hazards. However, decision trees should always be used with flexibility.

\(^4\) Since the aim of your HACCP system is to detect problems before they occur and certainly before they reach the customer, the critical limits chosen shall give you a rapid result. Thus, microbial levels are not generally used as critical limits, as the response time is too long. In this case, temperatures of eg cold storage may be used as critical limits, as long as the limits set are validated to ensure they do achieve the required level of microbiological safety.

\(^5\) It is important to note that Critical Limits shall be set on the basis of product safety (and/or quality), and are not based on process capability. Where there is a difference, your process shall be adjusted to ensure that it is capable of producing safe product.

Corrective actions shall be clear and unambiguous. Your food safety policy objectives cannot be achieved if the HACCP Plan fails at this step by releasing product that is potentially unsafe. Thus actions required, including responsibilities, shall be clearly articulated and followed if the process fails to achieve the critical limits.
9.5.4 Record Keeping
(Step 12, Principle 7 of Codex HACCP)
A system of record keeping relevant to the HACCP Plan shall be documented and implemented. All records associated with the HACCP System shall be retained including:

- Monitoring of CCPs (and QCPs);
- Corrective actions taken regarding CCPs (and QCPs);
- Changes to the HACCP system;
- Verification Activities

Records shall be retained for a minimum of 12 months, or the life cycle of the subject product(s), whichever is the greater.

9.6 Verification Activities
(Step 11. Principle 6 of Codex HACCP)
Verification procedures are required to ensure that the HACCP System is being followed and is effective. As a minimum, the verification activities that shall be undertaken include: internal audits, HACCP plan review, microbiological and chemical testing (where applicable), shelf life testing (where applicable), finished product assessments (where applicable), and review of monitoring and corrective action records.

9.6.1 Internal Audits
An internal audit of the entire HACCP Food Safety System shall be carried out on a (minimum) annual basis, and sufficient to maintain the effectiveness of the system. Records of internal audits shall be retained.

9.6.2 HACCP Plan Review
The HACCP system shall be reviewed at least annually, and when changes in production, formulation, equipment, processes or procedures occur which could potentially introduce new hazards or change the significance of existing hazards. Appropriateness of the system should be reviewed and verified by the HACCP team.

9.6.3 Microbiological & Chemical Testing Schedule
Where microbiological and/or chemical hazards have been identified as important during the hazard analysis process, a schedule of testing shall be included to confirm that CCPs (and QCPs) are under control.

9.6.4 Shelf-Life Testing
Where products are labelled with “Use by” or “Best-Before Date”, a schedule of shelf-life testing shall be implemented. This includes the tests to initially establish the shelf life (which is indicated in the Product Description) and from then on, end of shelf life testing to verify that shelf life is being met. This also applies to products shipped for further manufacturing or rework.

Shelf Life tests include microbiological and organoleptic test, and may in some instances include physical testing (eg weight loss during storage).

The shelf-life testing schedule shall include the type of testing to be undertaken and shall be carried out on each product, or product type, at least annually.

Results of the tests shall be reviewed and signed by a responsible officer within the organisation and corrective action taken when results indicate that limits have been exceeded.

9.6.5 Finished Product Assessments
If your organisation has included quality hazards as part of your HACCP Food Safety System, a schedule of assessments of finished product against your finished product specifications shall be developed, documented and implemented. Records of these assessments shall be kept.

Finished Product Assessments are not a requirement for those organisations only considering food safety hazards, but may be required by the business to ensure the product is edible and legal.

9.6.6 Monitoring and Corrective Actions of Verification Activities
A schedule shall be developed for reviewing monitoring activities and corrective actions.

9.6.7 Customer Complaints
A process for reviewing customer complaints that relate to food safety (and quality) issues shall be developed, documented and implemented.

9.6.8 Records of Verification Activities
Records of all verification activities shall be maintained by your organisation.

9.7 Prerequisite (Supporting) Programs
The following prerequisite (sometimes referred to as “supporting”) programs shall be included in your HACCP Food Safety System. The extent to which they apply will vary with the type of business and food safety risk. However they shall all be considered and applied where appropriate.
9.7.1 Staff Hygiene  
A staff hygiene policy and procedure shall be developed, documented and implemented that covers all the relevant sections of Standard 3.2.2 of The Food Standards Code (Australia) Food Safety Practices & General Requirements. As a minimum, the following criteria shall be included:

- Staff illness
- Eating, drinking & smoking restrictions
- Hand-washing requirements
- Sneezing, coughing & blowing of noses
- Cuts, wounds & bandage requirements
- Clothing requirements
- Jewellery restrictions
- Staff facilities provided by the organisation. This is to include, but not limited to, areas for staff to keep personal belongings, hand-washing & drying facilities, areas for eating drinking and smoking
- Staff movement restrictions

Staff hygiene compliance checks shall be undertaken and records of these checks maintained. The frequency of the checks is to be determined by the organisation and defined within the policy.

9.7.2 Housekeeping Practices and Stock Control  
A Housekeeping and Stock Control policy and practices shall be documented, including, as a minimum:

- The organisation shall ensure that the oldest stock, ingredients and the like are used first.
- Ingredients, raw materials, work in progress, finished product and packaging shall be stored in such a manner that they do not pose a safety (or quality) risk to the product.
- The organisation shall document the measures taken to prevent glass, wood, and hard plastic from entering the product.
- The organisation shall document what happens to product that may have come into contact with the floor or any other unsanitised surface.
- The organisation shall document how non-food items that could pose a risk to the safety (and or quality) of the products, are stored.
- The organisation shall document how chemicals that could harm the products are to be stored.
- Premises Construction & Layout shall meet the requirements of Standard 3.2.3 of the Australian Food Standards Code - Food Premises and Equipment.
- An adequate supply of potable water shall be available to ensure the safety & suitability of the products supplied. Only potable water is permitted to be used for the following activities - post harvest wash treatments, hand-washing, cleaning, as an ingredient, to make ice. Recirculated water for reuse in production, hand-washing and/or cleaning shall be treated. The treatment process shall be effectively monitored and the treated water tested to verify its safety.

- All vehicles used to transport raw materials, packaging, work in progress and/or finished product shall be maintained in a good state of repair and in a clean & hygienic condition. The transport vehicle(s) required to transport chilled food shall be able to maintain that food at or below 5°C, maintain the temperature of frozen food, and where required to transport hot food, can maintain a temperature at or above 60°C.

Housekeeping and Stock Control checks are required to be undertaken and records of these checks maintained. The frequency of the checks is to be determined by the organisation and defined within the policy.

9.7.3 Approved Supplier Program  
An Approved Supplier Program is required for all products and services that could affect the safety or quality of your organisations finished product. The following suppliers/providers shall be included:

- Raw Ingredients & Finished Goods Suppliers. You shall determine the requirements for approving such suppliers.
- Packaging Suppliers. You shall also document your requirements for approving packaging suppliers.
- Chemical Suppliers. Similarly, procedures shall be in place for approving chemical suppliers.
- Service Providers. You shall also state your requirements for approving service providers.

6. Consideration may also be given to the following documents and texts:
- "Basic Texts On Food Hygiene" Section IV Establishment: Design and Facilities (s4.1, s4.2 & s4.3), Codex Alimentarius, 1997, and
- "National Code for the Construction & Fitout of Food Premises", Australian Institute of Environmental Health, 2nd Ed, 1993

7. Examples of approval requirements could include: the requirement for the supplier to have a certified HACCP system in place, internal audits of the supplier by the organisation, product testing by the supplier (including certificates of analysis), product testing by the organisation or a combination of these requirements. The rigour of the Approved Supplier Process will be determined according to the food safety risk.

8. Examples of approval requirements could include evidence that the packaging is food grade (if it makes contact with the food), certified HACCP &/or Quality Assurance system in place.

9. Examples of approval requirements could include evidence of food grade status if they make food contact, and Material Safety Data Sheets.

10. Service providers include, but are not limited to, cleaning contractors, pest control companies, transport providers, warehousing providers, testing laboratories and auditing companies.
Your organisation shall clearly define the approval requirements for each supplier/provider, approval requirements for emergency suppliers/providers, and the means of removing suppliers. An annual review (as part of your internal audit program - refer 9.6.1) of all approved suppliers shall be undertaken to verify their performance. Records of the reviews shall be maintained.

9.7.4 Product Identification & Traceability.
The organisation shall have a procedure that ensures, for all stages of production from receipt through to finished goods, products are clearly identified. This shall include raw material receipt, storage, work in progress, rework, final product, on hold product, reject product, quarantined product, returned product, downgraded/damaged stock, pet food/animal feed, and waste product(s)\textsuperscript{11}.

9.7.5 Food Safety Skills (Training) Policy
The organisation shall also develop a skills and knowledge assessment policy to ensure that all staff members whose actions directly or indirectly impact on the safety of the food and/or ingredient, are competent in food safety at a level appropriate to the role they perform.

In addition, any staff member who is responsible for an activity that is associated with a CCP, (QCP) or responsible for the implementation of a prerequisite program shall be competent in that program.

The food safety skills policy shall include a review of staff food safety competence as part of the internal audit program (refer 9.6.1)

Records of all training and qualifications undertaken by staff and records of competence reviews shall be maintained.

9.7.6 Cleaning
The organisation shall develop, document and implement a cleaning program. The program shall identify the following:

- Areas within and outside the building that require cleaning.

- Equipment that requires cleaning

- Between batch cleaning

- Method of cleaning

- Frequency of cleaning

- Chemicals used (if applicable). All cleaning chemicals that either directly or indirectly come into contact with food shall be food grade. Current Material Safety Data Sheets (MSDS’s) for all cleaning chemicals shall be maintained on site at all times as proof that the chemical is food grade.

- Person(s) responsible for the cleaning

- Records of cleaning

The cleaning program shall state how monitoring of cleaning is undertaken, the frequency of monitoring, and corrective action to be taken if monitoring reveals that the cleaning is not effective.

A schedule of microbiological swabbing to verify the effectiveness of cleaning is also required in high-risk food production plants. Records of monitoring, corrective action and results of swabbing shall be maintained.

(Note: high risk food processes means the production, handling, storage, or processing of food that may lead to a significant likelihood of food borne illness or consumer injury if not effectively controlled).

In premises where allergen control is essential, “allergen cleans” are required between product runs, including retention of first-run product following the clean to test for allergen traces.

9.7.7 Pest Management
The organisation shall have in place a documented pest management program which includes a schedule for the application and frequency of treatments\textsuperscript{12}.

The program shall state how monitoring is undertaken and the frequency of monitoring, and corrective action to be taken if monitoring indicates the program is not effective.

The program shall also include:

- To ensure the entire premises is controlled, bait maps depicting the type and location of treatments.

- A current Material Safety Data Sheets (MSDS) shall be maintained for any pest control chemical that is being used on site.

- Where an external pest control contractor is used, you shall obtain a copy of the contractors licence.

- Records of monitoring and corrective action shall be maintained.

Chemicals used to control pests on or near food, food packaging, or food contact surfaces shall be food grade.

9.7.8 Maintenance
Equipment used to produce, prepare, store, process, or pack food shall be suitable for purpose, food grade (if in contact with food), easily cleaned, and assessed regularly to ensure it is in good condition.

\textsuperscript{11} You may also require a retention sample program where applicable. Product samples are retained at least until the end of their shelf life so as to be available if an investigation into the product’s safety (or quality) is required.

\textsuperscript{12} This may include, where applicable, chemical treatment (either via external contractor or in-house), electric insect traps, air curtains, strip curtains etc.
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Your organisation shall have in place a planned maintenance procedure and schedule for all food processing plant, equipment, services, premises and surrounds.

A record shall be kept of equipment inspections and planned maintenance.

Personnel involved in conducting maintenance, whether staff or contractors, shall adhere to the staff hygiene policies (refer 9.7.1).

9.7.9 Calibration

Your organisation shall have in place a documented procedure to ensure that all equipment used to inspect, measure or test the product is reading accurately so that the results of these readings can be relied upon.

A calibration schedule shall be available and include the following:

- A list identifying all equipment that requires calibration
- Frequency of calibration
- Method of calibration
- Acceptable degree of accuracy
- A method of identifying equipment that is out of calibration
- A method for taking corrective action on product produced whilst equipment was out of calibration

Records shall be available of all calibrations, calibration checks and any corrective action taken when equipment is found to be out of calibration.

9.7.10 Recall

The organisation shall have a recall procedure in place that complies with the requirements of the current edition of the Food Industry Recall Protocol published by Food Standards Australia and New Zealand (FSANZ).

The procedure shall contain a current version of the Food Recall Action Officers list published by FSANZ.

The organisation shall undertake an annual mock recall to verify the effectiveness of the recall procedure and demonstrate actions taken as a result of that recall.

Records of the mock recall shall be kept and available.

9.7.11 Labelling

Your organisation shall document, develop and implement a procedure for the preparing of and the reviewing of labels which includes:

- Labels shall be prepared so as to comply with FSANZ Food Standards Code, Trade Measurement requirements and other applicable regulations that may apply in certain specific sectors (eg meat industry).
- Labels shall be reviewed at least annually and more frequently if any of the following occur:
  - Changes to laws in relation to labelling
  - Changes to recipes including the introduction of ingredients that contain allergens
  - Changes to the labels/packaging are made

Records of labelling reviews shall be maintained.

9.7.12 Corrective Action of the HACCP System

You shall have in place a corrective action procedure in addition to the corrective action requirements detailed on the HACCP Audit Table and prerequisite programs. The purpose of Corrective Action is to help identify the root cause of problems and system faults as they occur, and to help prevent re-occurrence of the situation.

Corrective Action Procedures shall be implemented for the following situations:

- Customer complaints
- Continual product rejections
- Production of unsafe products
- HACCP Food Safety System failures.

The procedure shall describe how corrective actions are to be recorded, reviewed and investigated, and records shall be maintained.

13 Examples of equipment that require calibration include temperature measuring equipment, pH meters, flow meters, boom sprayers, weighing scales, data loggers, etc.