Principle #7
Record Keeping
Principle #7 - Record Keeping

Properly maintained HACCP records are the means by which the HACCP System documents that each CCP is under control & the system is functioning as intended.
Reasons for Keeping Records

• Provide irrefutable evidence
• Compliance audits
  – Regulatory
  – Internal
• Quick identification for recall
• Reassessment
Types of HACCP Records

• Four main types (NACMCF, 1998)
  – Hazard analysis
  – HACCP plan
  – Support documentation
  – Daily operational records
Records to be Kept

- HACCP Team information
  - Copies of certificates
- Approved, signed HACCP Plan
- Product description & ingredient list
- Verified flow diagram
Records to be Kept

• All HACCP Plan revisions, amendments, & validations
• Documentation of all training
• Monitoring records
Records to be Kept

• Deviation summaries
  – What happened?
  – What product was involved (identity, lot, line information)
  – When & where did it happen?
  – Who recorded the deviation?
• Hold/trace records
• Disposition summaries
  • Results of hazard evaluation (when needed)
Records to be Kept

• Rework documentation
  – Origin of rework
    • (e.g. date, time, batch #, line #)
  – Product formulation
  – Storage information
    • (time, temp.)
  – Results of any evaluations
    • (organoleptic and/or micro.)
  – Identity of product to which rework was added
  – Quantity of rework used in that product
Good Record Keeping

• Records must:
  – be made at the time of the activity
  – carry either initials or a signature

• Procedure is absolutely critical
  – no scratch-outs, white-out, arrows, or ditto marks
  – must be legible

• Develop forms to protect confidentiality & integrity

• Electronic records are acceptable as long as integrity is protected
  – See 21CFR§11 for pointers
Record Retention

• HACCP Records must be kept for
  – At least 1 year for (slaughter/fresh) OR refrigerated product
  – At least 2 years for frozen, preserved, or shelf-stable products
  – Must be kept on site for at least 6 months;
  – after 6 months,
    • kept off-site
    • provided to an inspector within 24 hours of an official request
Regulatory Access

• Records must be accessible to Regulatory personnel for review & copying
• Strongly suggest that they be required to sign out records
• HACCP plans & records are regarded as confidential documents & should not be distributed outside the company!