Principle #5 -

Corrective Actions

Monitoring of a CCP shows that a critical limit has been exceeded. **Deviation**

What Do We Do?

Utilize Corrective Actions!!

Deviation From CL

- A Deviation
  - Process not controlled at CCP
  - Hazardous situation may exist

Establishing Corrective Actions

- **Goals**
  - **correct (short term)**
  - **eliminate (long term)**
  - **restore process control**
  - **identify & secure**
- **Accurate recording of Corrective Actions is IMPERATIVE (**comply with 9CFR§417.3)

Sequence of Corrective Actions for Product Made During Deviation

1. Stop the line or process
   (if feasible)
2. Adjust process or equipment
   CCP under control
   Document
   perform monitoring activity
3. Record action taken
4. Determine disposition of product
   Supervisor & others

Sequence of Corrective Actions for Product Made During Deviation

5. Identify all product

   made between time of deviation & previous acceptable monitoring result

6. Place suspect product on hold

   Include scraps, ends, & test pkgs.

7. Determine disposition of product

   Supervisor & others

8. Determine product safety

Product Analysis

- Product presents a safety hazard?
  - Based on
    - ✓review of Hazard Analysis
    - ✓expert evaluation
    - ✓physical, chemical, or microbiological testing

Product Analysis

ANY DOUBT

THROW IT OUT

Recording The Corrective Action

Who

Did it

What

Product was affected

When

did it happen

Where

Is the product

How Much

Pounds, lots, etc

Corrective Action Regulation

- Ensure that:
  - No product enters commerce
    - that is either injurious to health
    - adulterated as a result of the deviation
  - The cause of the deviation is corrected.

No Corrective Action Plan In Place

1) Segregate and hold
2) Determine the acceptability
    1) The reviewer adequate training or experience to perform such review;
3) Ensure that no product enters commerce
4) Correct the cause of the deviation
5) Determine whether modification of the HACCP plan is required
6) Modify the HACCP plan as necessary.

Corrective Action Regulation

- Fully document
  - subject to verification.

Est. #999 HACCP MONITORING & CORRECTIVE ACTIONS for Beef/Pork Frankfurters

CCP #	Process Step	Hazards being Controlled	Critical Limit(s)	Monitoring Procedure/ Frequency/ Person(s) Responsible	Corrective Action(s)/ Person(s) Responsible	HACCP Records
1	Cooking	Biological: pathogens such as *Salmonella*, *E. coli* O157:H7, & *Y. enterocolitica*	152°F (internal) minimum	Sanitized, calibrated temp. probes inserted lengthwise into each of 3 franks at different locations in house. Temperature, time, & humidity continuously recorded on circular chart. Cook (or trained designee) will visually check the chart; if Critical Limit is met, Cook will write initials, date, & time next to record for that cook cycle	Corrective Actions will be taken by the Cook in strict accordance with 9CFR section 417.3. [Rack of franks will not be removed from house until internal temperature meets Critical Limit]. Maintenance check may be done on house	Circular recording chart used for Monitoring. HACCP – Frankfurter Corrective Action Form is used for Corrective Actions. Records are kept in the TS department for at least 6 months. After this time period, records may be kept in another storage location in accordance with 9CFR417.5(e)(2). Records are kept for a total of 2 years (again, per 9CFR417.5(e))

Reviewed by: *Robert H. Deibel* *4/1/04*

Example #1

- Critical Limit: Internal temperature of hot dogs is a minimum of 152°F at end of cook cycle
- Monitoring Result: Internal temperature of 146°F
- **<u>DEVIATION HAS OCCURED!</u>**

Example #1

Corrective Actions:

- Continue cooking until all product reaches an internal temperature of at least 152°F
- Check house operational controls & schedules; make corrections as needed; recheck accuracy of cookhouse probe

Example #2

Critical Limit: temperature of beef round (internal) & carcass surface must be 44°F maximum before fabrication

Monitoring Result: 52°F

DEVIATION!

Corrective Actions:

- Don’t Fabricate!
  - Rail back into cooler & chill rapidly to ≤ 44°F
- Check comparable carcasses for same problem
- Check cooler operations & alert maintenance of potential problems
- Check SOPs for cooler operation and carcass loading

How Specific ?

Corrective Action(s)/ Person(s) Responsible

Corrective Actions will be taken by the Cook in strict accordance with 9CFR section 417.3.

[Rack of franks will not be removed from house until internal temperature meets Critical Limit].

Maintenance check may be done on house.

Review of Corrective Actions

- Facility personnel **MUST** periodically review documentation on Deviations & Corrective Actions
  1. Are Corrective Actions effective?
  2. Are there any recurring Deviations?
     - If so, may need to modify process or replace equipment
- Be pro-active,
- Develop, implement, document preventive actions

According to FSIS Corrective Actions must

1. Determine the cause of the deviation and eliminate it.
2. Bring the CCP back under control.
3. Take measures to prevent reoccurrence.
4. Prevent unsafe or adulterated product from entering commerce.