

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!

