

# APPLICATION OF HACCP PRINCIPLES FOR THE MEAT INDUSTRY

## GUIDANCE SHEET NO: 20

### DOCUMENTATION AND RECORD KEEPING PRINCIPLE 7



#### WHY IS DOCUMENTATION AND RECORD KEEPING IMPORTANT?

Keeping food safety management documentation is a legal requirement and should be appropriate to the size and nature of the business.

The company's HACCP-based system checks provide written evidence for the operator, customers, and public health officials. Records of these checks should identify the persons who complete them and the paperwork should be easy to complete and kept up-to-date. Efficient and accurate documentation and record keeping are an essential feature of the CAREC Safe Processing Standard.

In the unfortunate event of a food safety incident that is connected to your products you will need to show that you have taken all reasonable precautions to produce food safely, it will also help with corrective actions. Demonstrating that the principles of HACCP have been correctly applied as required by law and that documentation and records are kept, will provide importance evidence of good practices in the event of any legal action against the food business.

#### GOOD PRACTICE FOR DOCUMENTATION AND RECORD KEEPING

You must make sure that the HACCP-plan, policy documents and record forms are up to date. This is done by controlling documents by:

- Dating each amended version;
- Giving each version a unique version number;
- Giving responsibility for HACCP-based documents, issuing authorised versions and keeping a full set of current HACCP-based documents on file to a named person or persons within your company;
- Ensuring that all records and documents are checked and signed off by management (this could be the person nominated to maintain the HACCP documents and records).

## DEVELOPING A DOCUMENTATION SYSTEM

When developing your documentation system, you should consider the following:

- What records need to be kept?
- How are they to be stored – e.g. hard copy, electronic?
- Where are the documents to be stored?
- How long are the records to be kept? (what is an appropriate time, think about the shelf-life of your product, whether the product might be frozen and kept for an extended period by the customer, and how the product may be misused by the customer);
- Who is responsible for the records?
- Who needs frequent access to the records?
- Who will fill in the records and how much time will be needed for completion of routine records such as temperature control records. It is important to keep record formats simple and make recording easy and quick to do.
- Could the record keeping process be automated using electronic monitoring and storage devices (data loggers linked to an electronic record system)?

## WHAT DOCUMENTATION AND RECORDS NEED TO BE KEPT?

**HACCP documents** –include the HACCP plan(s), the HACCP team notes and conclusions concerning the scope, flow diagram, hazard analysis, control point and critical / legal limit decisions, arrangements for monitoring, corrective actions, validation, verification review and any changes.

**Policy documents** –include the company’s good hygiene policies, procedures and staff instructions, and should include instructions for staff to complete monitoring and corrective action records.

**Records** – include monitoring results (for example, temperature readings), corrective actions; validation, verification checks and the review, as well as calibration results, microbiological test results, customer complaints, audit reports and training records.

## EXAMPLES OF DOCUMENTATION AND RECORDS

DOCUMENTATION	RECORDS
The HACCP plan	Critical Control Point monitoring activities
List of hazards and details of the hazard analysis	Deviations and associated corrective actions
Critical Control Point (CCP) determination	Verification procedures performed
Critical limit determination	Modification to the HACCP plan
Training needs analysis	Training undertaken
Procedures – e.g. standard operating procedures such as Corrective action procedure	Daily records (glass and brittle plastic check)
Work instructions	Visual inspection reports (exception reports)
	Team meeting records
	Processing records

The CAREC Safe Processing Standard provides templates for the most common types of records, depending on the scale of production and type of product some businesses may wish to include additional documents and records as part of their HACCP system.

## **SCHEDULED REVIEWS OF THE HACCP SYSTEM**

It is advisable to make a four-weekly review of the various features of the HACCP system, checking for persistent problems and any corrective actions taken.

A complete review of the HACCP system should be scheduled once per year. The HACCP system review should be combined with your internal audit as part of implementation of the CAREC Safe Processing Standard and take account of any non-compliances identified by the public health inspector during the annual inspection for compliance with the requirements of the CAREC Safe Processing Standard.

## **ACCESS TO DOCUMENTS AND RECORDS**

Documents and records can be created, recorded and kept on computer, but will need to be available for reference either on screen or in printed form.

Policy documents and HACCP-based system documents can be kept in ring binders. Records of checks and actions can be kept in a diary (The CAREC Safe Processing Standard provides templates for record keeping including a diary template).

You must have all documents and records complete and easily available for audit during the annual inspection of compliance by the Public Health Inspector.

## **HOW LONG DO I NEED TO KEEP DOCUMENTS AND RECORDS?**

Documents and records must be kept for a sufficient time to allow the operator to verify that the HACCP-based system is working effectively and for the competent authority to make their annual inspection of compliance with the requirements of the CAREC Safe Processing Standard.

Keep HACCP-based plans and documents and records relating to previous policies, systems and procedures and records supporting them (for example, validation, verification and review records), at least until the next official audit and for as long as the food that was produced under those arrangements is still for sale or potentially in storage.

Keep the daily records of monitoring and corrective actions at least until the next official audit and so the information is available in case of a food safety alert that can be traced back to the food in question, for example, two months after the date of consumption. This period should be extended for food that consumers may choose to freeze for consumption at a date much later than the shelf-life of the product in fresh condition without freezing.

**To ensure that HACCP documents and records are available when required they must be kept for 2 years from the date of completion.**

## **EXCEPTION REPORTING**

When checks are carried out once or a few times a day (for example, manual checks on chiller temperature) record the result of each specific check (temperature readings).

When daily checks are more frequent (for example, observation of carcass contamination) the results only need to be written down when there is a problem or something out of the ordinary happens, with a record of the corrective action taken – this is called exception reporting.

“Exception” means that the observation is an exception to the expected condition. Under normal conditions you would not expect to see visible contamination of meat carcasses. If contamination is seen, this is an exception to the expected condition, a record of the exception must be made along with a record of the corrective actions taken.

The CAREC Safe Processing Standard provides a template for exception reporting.

## REVIEW OF HACCP DOCUMENTATION AND RECORDS

The HACCP documentation and records form a valuable resource when the system is being reviewed as part of scheduled reviews, unscheduled reviews triggered when something has changed in the factory (such as changes to raw materials or processing parameters) and external inspections by the Public Health Inspector. Checks on documents and records are often the only way to identify a problem and the actions required to return the system to a safe condition. For example, examination of temperature records may show that an oven or chilling facility is starting to malfunction, this could eventually result in loss of control at a CCP. The records provide early warning of a potential problem allowing time for corrective actions to be taken.

## COMMON PROBLEMS WITH DOCUMENTATION AND RECORD KEEPING

The following are the most common problems encountered by food business operators with documentation and record keeping associated with their HACCP system:

- HACCP-based paperwork is too complicated for staff to complete or for auditors to verify;
- Documents are not properly managed, dated or numbered, so it is not clear which are the current versions that should be used or checked.
- Records are ignored, forgotten or not completed properly or too late after the check or action taken. This may be due to lack of training, poor instruction, misunderstandings, mistakes, or deliberate actions. This can result in misleading information that may be relied on by management and may lead to incorrect action or no action being taken to the detriment of food safety and / or non-compliance with legal requirements. **To avoid this problem all records should be reviewed and signed by a supervisor or manager.**