



Food Safety
AUTHORITY OF IRELAND



GUIDANCE NOTE

Assessment of HACCP Compliance (Revision 2)

Guidance Note No. 11

Assessment of HACCP Compliance

(Revision 2)

Published by:
Food Safety Authority of Ireland
The Exchange, George's Dock
IFSC, Dublin 1
D01 P2V6

Advice Line: 0818 33 66 77
Tel: +353 1 817 1300 Fax: +353 1 817 1301
Email: info@fsai.ie Website: www.fsai.ie
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ISBN 1-904465-17-X

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I. INTRODUCTION

Article 5 of Regulation (EC) No. 852/2004 of the European Parliament and of the Council on the hygiene of foodstuffs (hereafter referred to as the Regulation) requires food business operators to put in place, implement and maintain a permanent procedure(s) based on Hazard Analysis and Critical Control Point (HACCP) principles. In effect, this means that businesses must develop procedures (food safety management system) based on the seven principles of HACCP. Recital 15 of the Regulation allows for a degree of flexibility in the application of these principles and the complexity of the procedure(s)/system developed.

The European Communities (Hygiene of Foodstuffs) Regulations, 2006 (S.I. No. 369 of 2006) gives effect to Regulation (EC) No. 852/2004 and outlines offences relating to Article 5.

The purpose of this guidance document is to provide a consistent approach within the environmental health service towards the assessment of compliance with the HACCP requirement. It is based on the European Commission guidance document on *'Implementation of procedures based on the HACCP principles, and facilitation of the implementation of the HACCP principles in certain food businesses'*¹. It should be used in conjunction with the more general Food Safety Authority of Ireland (FSAI) publication 'Guidance Note No.1 - For Health Boards on the Inspection of a Food Business (Revision 1) 2004'. It is an evolving document and will be updated to take account of experiences and information from the other Member States and competent authorities, food businesses, environmental health officers (EHOs) and the European Commission.

2. SCOPE

This Guidance Note applies to those food businesses covered under Regulation (EC) 852/2004 [on the hygiene of foodstuffs] and subject to controls carried out under Regulation (EC) 882/2004 [on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare issues] by the Health Service Executive.

¹ Available at http://www.fsai.ie/legislation/food/eu_docs/Food_hygiene/EU_Guidance_HACCP.pdf

3. PREREQUISITE HYGIENE REQUIREMENTS AND HACCP

The production of safe food is ensured through the implementation of the hygiene requirements (Article 4 and Annex II of the Regulation) and the application of the HACCP principles (Article 5). HACCP is a systematic approach to identifying and controlling hazards (i.e. biological, chemical or physical) that could pose a danger to the production of safe food. The hygiene requirements provide the foundation for effective HACCP implementation and should be in place before HACCP based procedures are established. They are therefore regularly referred to as the prerequisite hygiene requirements or good hygienic practices (GHP). Additionally, the term prerequisite programme is often used and abbreviated to PRP.

The prerequisite hygiene requirements include general requirements dealing with structural, operational and personal hygiene which are detailed in Annex II of the Regulation and specific requirements, including maintenance of the cold chain, listed in Article 4(3). A summary of these requirements is given in Annex I of this document.

3.1 Maintenance of the Cold Chain as Part of the Prerequisite Hygiene Requirements

Under Article 4(3) (d) of the Regulation, food business operators are required, as appropriate, to ensure the maintenance of the cold chain. This obligation is therefore part of the prerequisite hygiene requirements and must be implemented even when simplified HACCP based procedures (Sections 4.1 and 4.2) are applied. The Regulation does not stipulate storage temperatures. In Ireland, recommended storage temperatures are given in national guides to good practice, e.g. the National Standards Authority of Ireland (NSAI) hygiene standards. Specific temperature requirements for certain foods of animal origin are however stipulated in Regulation (EC) No. 853/2004 (Note: These temperatures are not applicable at retail level but may be used as guidance).

4. HACCP COMPLIANCE OPTIONS

The Regulation allows for flexibility in relation to compliance with the HACCP requirement. It recognises that in food businesses undertaking low-risk activities, the prerequisite hygiene requirements are sufficient to control food safety without the need to develop a HACCP based system. Additionally, the Regulation allows for businesses to follow recognised guides to good practice where typical hazards and controls have been identified.

Compliance with the HACCP requirement may therefore be achieved in one of three ways:

1. implementation of the prerequisite hygiene requirement where this ensures that all hazards are effectively controlled
2. use of a recognised guide to good practice where the hazards and controls have been identified
3. development of a food safety management system by applying the seven principles of HACCP.

4.1 Controlling Hazards Through the Prerequisite Hygiene Requirements (Option 1)

Where the prerequisite hygiene requirements achieve the objective of controlling hazards in a food business, it should be considered, based on the principle of proportionality, that the requirements of Article 5 have been met and that there is no need to proceed with the obligation to put in place, implement and maintain a permanent procedure based on the HACCP principles.

Businesses where hazards may be controlled by prerequisite hygiene requirements alone, can be divided into two types:

- businesses where it is ‘presumed’, due to the nature of the business, that prerequisite hygiene requirements alone are sufficient. In such cases, a formal hazard analysis is not needed
- businesses, who upon applying the principles of HACCP, find through their own hazard analysis, that the prerequisite hygiene requirements alone are sufficient.

It could be recommended that businesses using this HACCP compliance option follow the prerequisite hygiene section of the relevant recognised guide to good practice.

In particular, this option applies to food businesses where there is **no preparation, manufacturing or processing of food**. Examples include the following businesses where there is usually no preparation of food:

- market stalls and mobile sales vehicles
- establishments mainly serving beverages (bars, coffee shops etc.)
- small retail shops (such as grocery shops)
- transport and storage of pre-packed food or non-perishable food.

(This list is not intended to be comprehensive).

However, it is possible that some businesses may be able to safely undertake simple food preparation operations when applying the prerequisite hygiene requirements correctly. Examples of simple food preparation operations include:

- serving soft whipped ice-cream
- small scale portioning of food, e.g. slicing cooked ham.

(This list is not intended to be comprehensive).

Where required for food safety, a food business operator using this option must ensure that the necessary monitoring, verification and possibly record keeping are carried out. For example, where a business stocks refrigerated food, it is a legal requirement that the cold chain is maintained (see Section 3.1). This is best achieved through regular monitoring of the temperature and regular verification that the monitoring is actually taking place.

It should be noted that flexibility regarding critical limits, monitoring and recording (as outlined in Section 5) may be applied by food businesses using Option 1.

Businesses categorised as 'low-risk' according to FSAI Code of Practice No. 1 (2006), are likely to be able to control hazards by prerequisite hygiene requirements alone (i.e. Option 1). It is possible that some businesses classified as 'medium-risk' may be able to follow this option for compliance.

4.2 Following a Recognised Guide to Good Practice (Option 2)

Businesses may choose to voluntarily follow a recognised guide to good practice (as envisaged under Articles 7 and 8 of the Regulation) which has already applied the principles of HACCP, e.g. the NSAI hygiene standards. These guides can be applied by any food sector and are particularly suited to sectors where the handling of food is in accordance with procedures that are well known and that are generally part of the usual vocational training of the operators in the sectors concerned such as:

- restaurants, including food handling facilities on board means of transport, e.g. ferries
- catering sectors dispatching prepared food from a central establishment
- the bakery and confectionery sector
- retail shops, including butcher shops.

For such businesses, it may suffice that the guides describe in a practical and simple way, the methods to control hazards without necessarily entering into detail on the nature of the hazards and a formal identification of critical control points. These guides should nevertheless cover all significant hazards in a business and should clearly define procedures to control these hazards and the corrective action to be taken in case of problems.

Before implementing a guide, food businesses must first ensure that the guide is appropriate to the business. This is done by assessing whether the guide covers all the operations in the business. Where operators identify activities not covered by the guide, they must apply the principles of HACCP to the additional activities.

It should be noted that flexibility regarding critical limits, monitoring and recording (as outlined in Section 5) may be incorporated into the recognised guides.

4.2.1 Use of a guide which is not formally recognised

Recognised guides are those which have been developed in accordance with Articles 7 and 8 of the Regulation and have been recognised by the relevant Government department and notified to the European Commission. In addition, guides recognised in another Member State are not considered recognised guides in Ireland unless they are submitted and recognised here.

Where a business is using a guide which has not been formally recognised, EHOs should assess the food safety management system/procedures in place in the business.

Any food business may choose Option 2

4.3 Developing a HACCP Based System by Applying the HACCP Principles (Option 3)

Businesses that develop their own HACCP based system should be advised to follow Annex I of the European Commission guidance document on HACCP which details the application of the seven principles according to the classical Codex Alimentarius approach.

It should be noted that flexibility regarding critical limits, monitoring and recording (as outlined in Section 5) may be applied by food businesses using Option 3.

4.3.1 Centrally located HACCP plans

In the case where a business develops a HACCP based system to be implemented at multiple locations, the following is advised:

- local elements of the national HACCP plan should be available on site. At a minimum, this should include:
 - a. instructions for monitoring and control of each CCP from delivery to point of service
 - b. monitoring records, including corrective actions taken
 - c. evidence of verification.

The national HACCP plan should be made available within a reasonable time frame upon request.

- Local understating and ownership of the plan is essential.
- At each location, a designated and suitably trained person should have responsibility for implementing the plan.

Any food business may choose Option 3

5. FLEXIBILITY IN THE APPLICATION OF SPECIFIC HACCP PRINCIPLES

In addition to the overall flexibility in developing HACCP based procedures (i.e. the three different compliance options), the Regulation allows for flexibility with regard to the following HACCP principles.

5.1 Critical Limits

Critical limits at critical control points can be chosen where they are:

- in a recognised guide to good practice
- in internationally accepted standards, e.g. developed by Codex Alimentarius
- based on experience of the operation in question (i.e. accepted best practice).

Non-numerical critical limits, such as the change of physical properties of food during cooking, e.g. no pink meat or red juices running out of joints when skewered, are permitted if valid.

5.1.1 Use of alternative critical limits

When a food business uses a critical limit that differs from the recognised national guides, the food business operator is obliged to demonstrate to the EHO that the alternative approach ensures the same level of food safety. This may be achieved by using a limit from a reputable sources, e.g. from Codex Alimentarius, Teagasc, etc. or it could involve the business undertaking its own risk assessment study.

5.2 Monitoring

Monitoring may be a simple visual observation, e.g.

- a regular observation or check of the temperature of refrigeration/freezing facilities using a dial/temperature display gauge. When this approach is taken, it is recommended that the display gauge is regularly cross checked by taking the temperature of the food using a calibrated thermometer
- a visual observation to check whether a food subjected to a particular heat treatment has the correct physical properties reflecting the level of heat treatment, e.g. boiling of liquid foods demonstrated by liquids bubbling rapidly when stirred.

Certain foods may sometimes be processed safely using standard calibrated equipment, e.g. roasting chicken. Such equipment used with standard portion sizes under standard conditions ensures that the correct time/temperature combination is achieved. In such cases, the cooking temperature of the product need not be systematically measured as long as it is ensured that the equipment is functioning properly, that the required time/temperature combination has been used and where necessary, corrective actions have been taken. Where standard calibrated equipment is being used, it should be regularly serviced and records of this kept.

In restaurants, certain food can be prepared in accordance with well established culinary procedures known to ensure that the food is safe. This implies that measurements, e.g. food temperature measurements, need not be carried out systematically, however, it is recommended that the temperature of the food is regularly checked by using a calibrated thermometer to confirm that the established safe procedure is being followed.

Systematic monitoring and record keeping may be required by an EHO for a specific period following evidence of non-compliance.

5.3 Documents and Records

As a general rule, documents and records should be designed to support the system (i.e. should ensure that control is maintained) without generating excessive paperwork. HACCP documents and records include:

- **Documents on the HACCP based procedures:**
Where appropriate recognised guides to good practice are used, these can substitute individual documentation on HACCP based procedures
- **Records on measurements and analysis carried out:**
In the case of monitoring, it may be considered to limit the need for establishing a record only to measurements of non-compliance. For example, where monitoring involves checking the gauge of the refrigeration unit, the food business is required to record the temperature whenever it exceeds the critical limit but is not required to record temperatures within the critical limit. When a food business operator chooses to use this approach (i.e. to 'record by exception') they are required to record the corrective action taken. The use of a diary or a checklist might be a suitable way of record keeping in such cases.

5.3.1 Documents and records relating to prerequisite hygiene requirements

(Article 4)

In a business which does not keep records relating to Article 4, where the food business operator cannot adequately demonstrate compliance with Article 4 then the EHO can recommend that the business develops appropriate procedures and maintains records.

In the case of a food business which is controlling its hazards through the prerequisite hygiene requirements (i.e. Option 1), in which ready-to-eat food is stored at refrigeration or freezing temperatures, it is recommended that the business keeps and verifies monitoring records to demonstrate that the cold chain was maintained. Flexibility regarding monitoring and recording (i.e. as outlined in Sections 5.2 and 5.3) may be applied by food businesses using Option 1.

5.3.2 Retention of documents and record

In relation to retention of documents and records, S.I. No. 369 of 2006 European Communities (Hygiene of Foodstuffs) Regulations, 2006, states the following in Part 2 Article 5:

(3) In the case of foodstuffs requiring the indication of a 'use-by' date in accordance with Article 10 of Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000, the documents and records shall be retained for **three months** after the expiry of the relevant 'use-by' date.

(4) In the case of foodstuffs requiring the indication of a 'best-before' or 'best-before end' date in accordance with Article 9 of Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000, the documents and records shall be retained for **one year** after the expiry of the relevant 'best-before' or 'best-before end' date, as the case may be.

(5) In the case of foodstuffs for immediate consumption, the documents and records shall be retained for **three months** after the sale of the foodstuff.'

6. VERIFICATION

The different businesses targeted under the National HACCP Strategy consistently demonstrated the lowest level of compliance with regard to verification. It is thought that this is largely due to a lack of understanding of what verification entails.

Verification involves two elements:

- validation of the system (i.e. confirmation that if implemented, the system will ensure food safety). This should occur before a plan is implemented and/or whenever a change occurs which affects the plan. The plan should be reviewed on a periodic basis to ensure that it is still valid. Businesses following or using critical limits from recognised guides to good practice will not need to validate the system, as it should already have been done for them
- verifying/checking that the system is being implemented as planned, e.g. checking that monitoring is taking place and the corrective action is carried out when necessary. This should take place regularly.

Validation: Looking for evidence that the HACCP based procedures are correct and will ensure food safety.

Verification: Looking for evidence that the HACCP based procedures have been implemented as planned.

7. HACCP AND TRAINING

Annex II, Chapter XII of the Regulation requires that those responsible for the development and maintenance of the HACCP based procedures or the operation of a relevant guide have received adequate training in the application of the HACCP principles. HACCP training should be proportionate to the size and the nature of the business and does not need to be formal.

Where a business is using HACCP compliance Option 1, training in the HACCP principles may not be necessary.

Where a business is following a recognised guide to good practice (i.e. Option 2), the person responsible for implementing the guide must understand the guide, including the HACCP component. They should have an understanding of the principles of HACCP.

Where a business develops its own HACCP based system (i.e. Option 3), the person or team who designs the system must be able to demonstrate to the EHO that they have sufficient knowledge, through formal or informal training, of the application of the principles of HACCP.

All staff involved in implementation of either a guide or a HACCP based system must have a suitable understanding of their role to ensure effective implementation.

8. USE OF EXTERNAL ASSISTANCE

Where a HACCP based system has been devised by an external advisor, such as a consultant, it is essential that there is sufficient ownership of the system by the food business itself. Food business operators using this route should make sure that they know how the system works and how it is being applied to their business and that their staff are suitably trained to ensure effective implementation. For guidance, food businesses should be referred to the FSAI booklet - 'How to Select an External HACCP Consultant'².

9. REGULATORY ASSESSMENT

Regulatory assessment should be carried out taking into account the means that have been chosen by food businesses for ensuring compliance with the HACCP requirement (see Sections 4.1, 4.2 and 4.3). Where food businesses ensure food safety through prerequisite hygiene requirements alone, the EHO should verify the correct implementation of these requirements. Where a recognised guide to good practice is followed or a HACCP plan is developed, the businesses should be assessed against that guide or HACCP plan as appropriate.

When assessing the implementation of the HACCP requirement, the EHO may require corrections to be made, where for example, hazards are being overlooked/not being effectively controlled or where monitoring is not sufficiently frequent etc. This is not considered a formal approval of the HACCP based procedures.

If in the professional judgment of the EHO, hazards are not being controlled through the HACCP compliance option the food business has chosen, they can recommend that the food business changes its HACCP compliance option.

Annexes I, II and III should be used by EHOs to assess compliance for Options 1, 2 and 3, respectively.

10. RESPONSIBILITY OF EHO

It is the responsibility of the EHO to assess compliance, to ensure that the proprietor is made aware of any non-compliances and remedial actions required. It is not the responsibility of the EHO to design the HACCP based system.

EHOs should use their professional judgement to assess whether a business has made reasonable progress in moving from no evidence of compliance towards full compliance. This applies to all food businesses whether or not the business is within the HACCP targeted group (as set out under the National HACCP Strategy).

² http://www.fsai.ie/publications/haccp/HACCP_EXTERNAL_CONSULTANT.pdf

II. ADDITIONAL ISSUES WITH REGARD TO THE EXECUTION OF THE NATIONAL HACCP STRATEGY

II.1 Assessing the Stage of Compliance

HACCP has been a legal requirement in retail and catering businesses in Ireland since 1998. Businesses in operation since then should be compliant.

It is recognised that because development of a HACCP based system generally occurs in a staged manner, some businesses may have commenced compliance but may not be fully compliant in all aspects of the HACCP requirement. In recognition of this, Table I may be used to summarise the stage a business is at with respect to HACCP compliance. EHOs should use professional judgement to determine the stage of compliance based on the evidence gathered during the inspection.

Table I: Stage of Compliance Matrix*

HACCP Principles	Stage of Compliance		
	No evidence of compliance	Commenced compliance	Compliant
(a) Hazard analysis conducted			
(b) Critical control points (CCP) identified			
(c) Critical limits established for each CCP			
(d) Monitoring procedures in place and implemented			
(e) Corrective actions identified and implemented where necessary			
(f) Verification procedures in place and implemented			
(g) Necessary documents and records kept			
Additionally			
HACCP based procedures reviewed in the event of a modification in the product/process/step			

*Note: This matrix is appropriate for use when a business is using either HACCP compliance Option 2 or 3 (see Annexes II and III, respectively).

11.2 Action in Premises Targeted under the National HACCP Strategy

At the end of the target period, EHOs should decide, based on the comparison of the initial and final assessment as to what type of action, if any, is necessary. In the event that progress has been made, but more is required, the EHO may take informal action, e.g. an informal letter. Where no progress or very limited progress has been made, appropriate action should be taken.

ANNEX I. Assessment of Compliance when Controlling Hazards through the Prerequisite Hygiene Requirements (Option 1)

Where a food business has chosen this option, EHOs should:

- look for evidence of compliance with the specific and general hygiene requirements of the Regulation (Sections 1 and 2 following, respectively).
[NOTE: Use Table 1 of FSAI Guidance Note No.1 on the Inspection of a Food Business (2004) to assist in identifying evidence]
- assess if there is a need for additional controls (i.e. the need to implement HACCP compliance Options 2 or 3). If there is no need for additional controls, the business is considered to be compliant with the HACCP requirement
- establish that records of monitoring and corrective actions (as necessary) are being kept and verified where advisable for ensuring food safety, e.g. maintenance of the cold chain.

I. Specific Hygiene Requirements

Article 4(3) of Regulation (EC) No. 853/2004 requires food business operators to comply as appropriate with the following specific hygiene requirements:

- (a) compliance with microbiological criteria for foodstuffs
[NOTE: These are specified by Regulation (EC) No. 2073/2005];
- (b) procedures necessary to meet targets set to achieve the objectives of this Regulation
- (c) compliance with temperature control requirements for foodstuffs
- (d) maintenance of the cold chain
- (e) sampling and analysis.

2. General Hygiene Requirements

Article 4(2) and Annex II of Regulation (EC) No. 852/2004 require food business operators to comply with the following general hygiene requirements:

- I. General requirements for food premises (other than those specified in chapter III)
- II. Specific requirements in rooms where foodstuffs are prepared, treated or processed (excluding dining areas and those premises specified in chapter III)
- III. Requirements for movable and/or temporary premises (such as marquees, market stalls, mobile sales vehicles), premises used primarily as a private dwelling-house but where foods are regularly prepared for placing on the market and vending machines
- IV. Transport
- V. Equipment requirements
- VI. Food waste
- VII. Water supply
- VIII. Personal hygiene
- IX. Provisions applicable to foodstuffs (**see Note 1**)
- X. Provisions applicable to the wrapping and packaging of foodstuffs
- XI. Heat treatment of food in hermetically sealed containers
- XII. Training (**see Note 2**)

Note 1: Chapter IX on provisions applicable to foodstuffs involves supplier control because it requires that food businesses do not accept raw materials or ingredients if they are thought to be contaminated.

Note 2: Chapter XII on training requires both general hygiene training and HACCP training.

ANNEX II. Assessment of Compliance when following a Guide to Good Practice (Option 2)

- Is the guide being used appropriate to the business?
- Is it available on site?
- Do all staff responsible for implementing the guide understand what they should be doing?
- Is the guide being implemented? See table below.

Table: Examples of Evidence of Compliance in a Business using a Recognised Guide to Good Practice (i.e. Option 2)

HACCP Principles	Examples of Evidence
(a) Hazard analysis conducted	The food business operator has confirmed that the guide covers all steps which occur in the business. For all steps not covered by the guide, the food business operator has applied the HACCP principles to the additional step(s).
(b) Critical control points (CCP) identified	The relevant CCPs and/or control measures in the guide are being followed. Note: the guide may not have identified CCPs.
(c) Critical limits established for each CCP	The critical limits in the guide are being followed.
(d) Monitoring procedures in place and implemented	Monitoring taking place as recommended by the guide. If visual monitoring is employed is it cross-checked where necessary, e.g. checking that the dial/gauge of refrigeration unit is working by probing the food?
(e) Corrective actions identified and implemented where necessary	Corrective actions are being made as recommended by the guide.
(f) Verification procedures in place and implemented	Verification is taking place as recommended by the guide.
(g) Necessary documents and records kept	The guide is available on the premises and the records recommended by the guide are being kept.
Additionally	
HACCP based procedures reviewed in the event of a modification in the product/process/step	If there has been a significant change which is likely to affect food safety, has the business reviewed its procedures and assessed if following the guide will continue to ensure food safety in light of the change.

***Note:** This is an aide memoir and is not an exhaustive list

ANNEX III. Assessment of Compliance of a System based on the Principles of HACCP (Option 3)

Table: Examples of Evidence of Compliance in a Business Applying the Principles of HACCP (i.e. Option 3)

HACCP Principles	Examples of Evidence
(a) Identifying any hazards that must be prevented, eliminated or reduced to acceptable levels;	A HACCP team or a person responsible for developing, implementing and maintaining the HACCP system
	People who conducted the hazard analysis to be able to demonstrate that they had sufficient knowledge and understanding of the HACCP principles and the operations in the business
	A detailed description of the product or group of similar products or steps in the process
	Background information available on the hazards appropriate to the product or process
	Consideration given to biological, chemical and physical hazards
	Consideration to variability of staff/equipment/raw materials in the hazard identification
	A flow diagram constructed for each product or process which covers the entire process
	Onsite verification of the accuracy of the flow diagram to ensure that all the steps from purchase of raw materials to serving or sale were considered
	Hazard analysis covers all products or processes in the business
	Etc.
(b) Identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels;	Identification of critical control points (CCPs)
	If no CCPs are identified, was this because the prerequisite hygiene requirements were believed to control all the hazards identified?

HACCP Principles	Examples of Evidence
	CCPs identified are designed to eliminate or reduce the likely occurrence of the hazard to an acceptable level
	Etc.
(c) Establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards;	<p>Determination of critical limits (acceptable levels) beyond which each CCP is uncontrolled.</p> <p>This should include evidence to support the validity of each critical limit. Evidence may include reference to documents such as legislation, scientific literature, recognised guides, etc. Evidence may also be obtained by the food business conducting its own validation studies.</p>
	Etc.
(d) Establishing and implementing effective monitoring procedures at critical control points;	Someone responsible for ensuring that control is maintained at the CCP (i.e. monitoring the CCP)
	The person responsible for monitoring the CCP has a suitable understanding of what they are doing
	The person responsible for monitoring the CCP knows what to do/who to contact in the event that the CCP is out of control
	A reasonable monitoring frequency
	Evidence that monitoring does occur
	Etc.
(e) Establishing corrective actions when monitoring indicates that a critical control point is not under control;	A corrective action procedure for each CCP which ensures control will be restored
	Evidence that corrective action has been taken when appropriate
	Etc.

HACCP Principles	Examples of Evidence
(f) Establishing corrective actions when monitoring indicates that a critical control point is not under control;	
– validation	Before implementation of the plan, checking that it covers all steps actually occurring in the business
	Conducting specific studies to demonstrate that a proposed critical limit will ensure food safety
	Consulting updated/new recognised guides, legislation and scientific literature to ensure that critical limits used are still valid
	Etc.
– verification	Inspection of premises and staff practices to ensure that the system is being implemented as intended
	Examination/audit and sign off of monitoring records to ensure monitoring is taking place as outlined in the plan
	Regular cross-checking of visual methods of monitoring to ensure they are achieving food safety, e.g. cross-checking of a fridge display gauge by taking the temperature of the food using a calibrated thermometer
	Examination/audit and sign off of corrective action records to ensure that actions were taken when critical limits were exceeded?
	Examination/audit and sign off of thermometer calibration records
	Cross-checking of equipment display gauges by using a calibrated probe thermometer to probe the food
	Cross-checking time/temperature combinations for cooking by using a calibrated probe thermometer to probe the food
	Audit reports (internal/external/enforcement) acted upon within a reasonable timeframe

HACCP Principles	Examples of Evidence
(g) Establishing documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f).	<p>Documents could include:</p> <ul style="list-style-type: none"> – Final HACCP plan – Hazard analysis and CCP determination – Documentation to support the critical limit – Modifications to the HACCP plan.
	<p>Records could include:</p> <ul style="list-style-type: none"> – monitoring records – corrective action records – verification records <p>Note: Often one record is used to record all three of the above</p>
Review	
<p>When any modification is made in the product, process, or any step, food business operators shall review the procedure and make the necessary changes to it.</p>	<p>A modification might be:</p> <ul style="list-style-type: none"> – the introduction of a new piece of equipment – a change to the structure or layout of the premises – a new procedure or process – a change in management/supervisory structures – legal change – major food scare affecting a similar business

Note: This is an aide memoir and is not an exhaustive list, nor is every example required in every premises - it will depend on the nature and size of the business.



Food Safety Authority of Ireland **Údarás Sábháilteachta Bia na hÉireann**
The Exchange, George's Dock, **Cúirt na Mainistreach, Sráid na Mainistreach Íocht.,**
IFSC, Dublin 1 **Baile Átha Cliath 1**

Tel: +353 1 817 1300

Fax: +353 1 817 1301

Email: info@fsai.ie

Website: www.fsai.ie

ISBN 1-904465-17-X

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