

No.6 May 2003

Newsletter No.6 considers the last two HACCP principles, verification and documentation.



**The Meat (HACCP) Regulations 2002 will apply to all UK licensed slaughterhouses, cutting plants and cold stores from 7 June 2003.**

In an MHS survey at the end of March, 130 small plants had already fully implemented HACCP principles.

The same requirements will also apply in other EU Member States. The requirements for HACCP-based procedures and microbiological testing will be replaced and extended by new EU regulations, that will apply to all food business operators (except farmers) by 1 January 2007 or earlier.

## IMPORTANT INFORMATION ON MICROBIOLOGICAL TESTING

Newsletters 4 and 5A set out guidance on reduced frequency of testing of carcasses and production surfaces for red meat plants. That guidance stated that testing could be reduced if the results were satisfactory. Important changes have now been made that make reduced testing easier to achieve.

A separate guidance note summarises the initial and reduced testing frequencies in two tables for easy reference. The notes below each table explain what constitutes a satisfactory result.

**For surface testing, the definition of satisfactory results has been changed in two ways:**

- the initial number of tests has been reduced from 6 sets of 10 samples to 2 sets of 10 samples; and
- the level of results that need to be achieved has been raised from 10 cfu/cm<sup>2</sup> to below 100 cfu/cm<sup>2</sup>.

This change follows a review of data that indicate that a limit of 10 cfu/cm<sup>2</sup> is excessively stringent for premises producing raw meat and suggest that it is reasonable to allow a 'margin' in view of the variability of sampling and laboratory examination methods. Two consecutive sets of 10 samples should be adequate to show whether cleaning is effective.

**For carcass testing, the results should be calculated in a different way.** The change is from 'log means' to 'mean logs'. This is due to an error in the original Decision. The use of mean logs minimises the impact of outlying high results, so changing the way the result is calculated will make the performance criteria easier to achieve.

## IS YOUR HACCP PLAN A FAIRY TALE?

### VALIDATION

➤ **CONFIRM (i.e. validate) that your HACCP Plans are complete and accurate**

e.g. Do not refer to mythical cleaning schedules, training records or staff instructions.

Do include recent changes in procedures and make sure that process flow diagrams do not miss out key stages.

Do not refer to monitoring checks and records that don't exist.

Do not claim to carry out checks more often than is actually done.

If necessary, *CHANGE your HACCP plans*, so that they accurately describe all the procedures you have in place to protect public health. If you don't and something went wrong and your HACCP Plans could not be believed, what else would be?

### VERIFICATION

➤ **CONFIRM (i.e. verify) that your HACCP Plans are effective**

i.e. your procedures work to protect public health.

You can do this by looking at, for example,

- Monitoring records to review the number of breaches of critical limits e.g. reasons for rejected animals/carcases etc.
- Microbiological test results
- Staff instructions to see that they properly describe monitoring and corrective actions
- The number of and reasons for customer complaints
- Reports from customer or other auditors

And at least once a year:

*REVIEW your HACCP plans* to confirm that the product descriptions, process diagrams, control measures, staff instructions and recording procedures are still appropriate and accurately recorded.

### RECORD KEEPING

The law requires that operators have a permanent procedure for regular checks on the hygiene of the plant, based on HACCP principles. Procedures for the hygienic operation of slaughterhouses, cutting plants and cold stores therefore need to be documented to prove that they exist.

Documentation consists of:

- Hygiene procedures / staff instructions (e.g. cleaning, maintenance, pest control, training, operational)
- HACCP Plans
- Daily monitoring and corrective action records at CCPs.

It is better to have a few records that are accurate and kept up to date, than to claim to have lots of records that do not actually exist.

It is easier to complete a few monitoring records (one at each CCP) as each check is done (or shortly afterwards) than to go to the effort of making them up, or copying them from one record to another.

***Refer to Section 4 of the Meat Plant HACCP Manual for more information***

The Meat Training Council have just advised that following QCA accreditation, the **INTERMEDIATE CERTIFICATE IN HACCP PRACTICE (MEAT PLANT)** based on the Meat Plant HACCP Manual is now a **National Recognised Qualification**. Training providers can now be approved to deliver the course and can apply to Learning & Skills Council, ELWA or Local Enterprise companies in their area for funding.