Self-examination for compliance with HACCP

The questions in the self-examination questionnaire in the following pages go through the key requirements of HACCP; they are the kind of questions which you should be asking yourself, as an organization, as you try to decide where you are HACCP compliant. This will give pointers to where you need to make changes. It cannot be emphasized too strongly that there are no standard ways of achieving compliance; rather there are hundreds of approaches to complying with any particular requirement. You need to focus on the requirement itself and to find the most convenient and cost-effective way to meet it in your particular situation.

With each question, tick one of the boxes numbered 1 to 4, based on the following code:

1 mark	No we do not meet this requirement at all
2 marks	We meet some parts of this requirement- some level of implementation is in place
3 marks	We meet most parts of this requirement- some level of implementation and documentation is in place
4 marks	We meet this requirement fully- all requisite documents and implementation requirements have been met

The numbers in brackets in the questionnaire refer to the relevant clauses in HACCP

The higher your total score on this questionnaire, the less you will have to do to become compliant. However, this questionnaire is only intended to form an *initial* audit in key areas and does not cover the whole of HACCP, so even if your answers are all 4sthis does not mean that you already comply—but you are very well placed to make the final adjustments. The maximum score is **160** by the way!

Some general thoughts to bear in mind

HACCP is very much a standard to which you adhere by your own efforts. You document how you will meet the requirements of the standard and how you will manage your activities to maintain compliance. You then commit to monitoring your own compliance through audit and related activities and to taking corrective action when you move out of compliance.

When you are assessed, the certification body will, of course, determine whether you are compliant on the day of audit. However, the auditors will be far more interested in satisfying themselves that you have a robust system which will maintain compliance on a routine basis. The auditors normally visit only once a year so the steps which you take to maintain and monitor compliance between visits are a key issue with them.

A well-managed quality system should pay for itself by reducing the amount of re-testing or re-calibration a organization needs to do and by improving its clients' confidence and hence its success as a business.

NOTE: In this context "document" could be policy statements, procedures, specifications, calibration tables, charts, text books, posters, notices, memoranda, software, drawings, plans, etc. These may be on various media, whether hardcopy or electronic, and they may be digital, analog, photographic or written.

Key to understanding your level of implementation

Mostly 1s	Further training and implementation need to be taken up
Mostly 2s	You can begin the initial certification application process, but training should be taken up to document the system
Mostly 3s	You are ready for the certification application process, but you should focus on establishing consistency in operations
Mostly 4s	You are ready for the certification application process, and you should focus on continual improvement

S No.	HACCP Requirement	Score (1-4)	Objective evidence (Name the document(s))
Section A: Management System			
1. Management Commitment			
a.	What is the scope of the HACCP Food Safety system to be included in the certification?		
b.	Has Senior management i)Demonstrated commitment to the effective implementation of the requirements of HACCP & GMP Certification Criteria		
c.	ii) Provided appropriate and trained resources to ensure food safety of the products produced or handled under the scope of certification.		
d.	Does the organization have documented: i) A system in place to ensure it has access to the below for the country in which the product is to be manufactured and sold in: a) Appropriate regulatory requirements? b) Codes of practice? c) Appropriate standards? ii) How the Food Safety Management System is maintained?		
2. Continual Improvement			
a.	Does the organization have a procedure in place for continual improvement?		
b.	Does this procedure include a review of the entire Food Safety Management System at least annually?		
c.	Have the outcomes of the following (as a minimum) been considered for the continual improvement/review: i) External audits? ii) Internal audits? iii) Corrective actions? iv) Verification activities? v) Non-conformances?		
3. Food Safety Policy			
a.	Does the organization have a Food Safety Policy in place which has been signed by the senior executive manager?		
b.	Does the policy state the organisations commitment and objectives for the supply of safe products that meet: i) customer expectations? ii) legal requirements? iii) Continuous improvement? iv) Suitable for consumption in the country of manufacture/production and the country of sale?		
c.	How is this policy communicated to staff?		
d.	Does the organization hold a certificate of suitability of premises from the relevant district office?		

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4. Organization Chart & Job Descriptions			
a.	Does the organization have a documented organization chart in place which identifies all management and staff positions?		
b.	Are job descriptions available for all the positions on the organization chart which have responsibility for food safety and maintenance of the Food Safety System?		
c.	Are deputies in place for key roles with responsibilities for food safety?		
5. Description of How the System Works			
a.	Does the organization have a document in place to show how various operations within its scope interact?		
b.	Does this include the documented scope of the Food Safety Management System?		
6. Document Control			
a.	Does the organization have a document control procedure in place for the Food Safety System (paper based and/or electronic) that ensures the most current authorised version is available to all staff?		
b.	Does the procedure include: i. Where documents and records are kept and the processes in place to implement the Food Safety System? ii. Who is responsible for the development and maintenance of all documents within the Food Safety System including amending and authorising documents? iii. What methods of ensuring obsolete documents are removed from use? iv. Who is responsible for communicating changes to documentation within the Food Safety System? v. What methods are in place to control the security of the paper based and electronic documentation? vi. What methods are in place for the destruction and control of customer owned / branded / trademarked documentation, product and packaging?		
c.	Document Register Does the organization have a document register in place for the Food Safety Management system? Does this register include the following: i) Scope and purpose? ii) Product description & intended use? iii) Hazard analysis, including risk assessment? iv) HACCP Plan? v) Specifications (finished product, chemicals, raw		

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	materials and packaging)? vi) Formulations, standard operating procedures? vii) Pre-requisite programs? viii) Polices? ix) Forms? x) Work instructions? xi) Are the date and/or the version number indicated within each document?		
d.	Does the organization have access to and control of external documents or references required to maintain the system including relevant industry standards, or guidelines, regulations, recall protocols, codes of practice etc.?		
e.	Does the organization have an amendment register in place which lists any amendments to documents listed in the documents register?		
f.	Does the amendment register contain as a minimum the reason and date of the change?		
g.	Does the organization have a master list of documents and records for the Food Safety System?		
	SUB TOTAL FOR MANAGEMENT REQUIREMENTS		
Section B. HACCP Requirements			
7.	**Preliminary Steps** Has the organization developed, documented and implemented HACCP based Food Safety System based on Codex Principles?		
8.	**The HACCP Team** Does the organization have an appointed and documented HACCP Team? Does the HACCP Team comprise of individuals within the organization that have the process skills and knowledge to develop and maintain the HACCP Plan? (Note: a multifunctional team is preferable) Who is the HACCP Team Leader and does this individual hold the following credentials: i)Has operational accountability within the organization? ii)Has attended a competency-based and assessed training course in the application of HACCP principles or equivalent? How is the day to day management of the Food Safety System demonstrated? E.g. monitoring of CCP records.		

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9.	**Scope and Purpose of the HACCP plan** Is the scope of the HACCP plan defined and documented including: i)Start and end point of the processes? ii)Products covered? Is the purpose of the Food Safety System defined and documented including the intent that all food safety hazards will be identified and controlled?		
10.	**Product description and Intended Use** Have product descriptions been developed and documented for all products included within the scope? (Similar products can be grouped together. Products which are processed using different food safety controls, processing techniques or packaging methods require a separate product description). Does each product description cover the following criteria: i) Description of product? ii) Composition? iii) Physical/Chemical/Microbiological characteristics? iv) Method of preservation? v) Packaging – primary, secondary and tertiary? vi) Storage, handling & distribution methods? vii) Shelf life? viii) Intended use of the product? ix) Labelling requirements including any claims? x) Allergens? xi) Sensitive consumers?		
11.	**Flow Diagram** Are documented flow diagrams in place which includes the following: i) Rework? ii) Inputs (including packaging, chemicals, air, water and steam)? iii) Outsourced process steps? iv) Waste? Has the HACCP team verified the flow diagrams on the following occasions and are records of verification available: i) Annually? ii) If there have been any significant changes to the product or process?		

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12.	**Hazard Analysis** Has hazard analysis been undertaken and documented at each step of the process as identified in the flow diagram(s)? Has a hazard analysis been under taken for each raw material input? At each step have all potential food safety hazards (biological, chemical and physical) been identified and assessed to identify hazards that need to be prevented, eliminated or reduced to accepted levels? Have the hazards and the cause of the hazards been documented? Have all potential allergenic hazards been considered, identified and documented? Has each hazard been considered as a separate hazard with a separate risk assessment? I.e. hair, metal. These shall not be grouped as foreign material. Has a risk assessment been undertaken to determine which hazards are significant and which are not? (Significance determined by comparing severity of hazard against the likelihood of the hazard occurring) Have quality hazards been identified? Has the risk assessment for quality hazards been considered separately to the food safety hazards? For any hazard determined to be significant has at least one control measure been determined to prevent it from occurring or reduce to an acceptable level? Has the organisation developed a method or utilised one of the standard text book methodologies for hazard analysis? Whatever method used has it: i) Been applied consistently throughout the Food Safety System. ii) Is the source referenced? iii) A copy of the reference shall be included.		

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13.	**HACCP Plan** Has a HACCP Plan been developed, documented and applied which includes each step of the process(es)? Does this table list all the CCPs identified in the Hazard Analysis?		
14.	**Establish Critical Limits** Have critical limits for CCPs been established and documented in the HACCP Plan? Are the critical limits measureable and how is it monitored during production? Are the critical limits guidelines available through industry standards, legislation and codes of practice or published research? If not: i) Has the organization undertaken a validation study to ensure said limits will control the significant hazard? ii) Has this validation data been documented and maintained by the organization?		
15.	**Monitoring of CCPs** Has the organization documented how each CCP is monitored to ensure it is within the critical limits that have been set? Are monitoring procedures available to define: i) What is being monitored? ii) How the monitoring is carried out? iii) The frequency of the monitoring and is it sufficient to ensure that the CCP is under control? iv) Where the monitoring is to be undertaken? v) Who is responsible for undertaking the monitoring? Is the frequency of monitoring sufficient to ensure that the CCP is under control? Are staff that conduct monitoring checks on CCPs trained in correct methods? Is this training assessed and documented? Are records of monitoring of CCPs i) Maintained? ii) Signed by the person responsible for the monitoring? iii) Signed by a responsible reviewing officer? (Shall not		

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	be the same person responsible for the monitoring).		
16.	**CCP Corrective Actions** Have CCP corrective Actions been developed, documented and implemented that define the action(s) to be taken when monitoring reveals that the critical limit has not been met? Are procedures in place that states the action to be taken regarding: i) The affected product? ii) Who is responsible? iii) What action is to be taken regarding the process? Is root cause analysis undertaken to identify the problem and prevent recurrence?		
17.	**Verification Activities** Are verification procedures in place to ensure the Food Safety System is being followed and is effective? Do verification activities include the following as a minimum: i) Internal Audits? ii) HACCP plan review? iii) Microbiological and chemical testing (if applicable)? iv) Shelf life testing (if applicable)? v) Finished product assessments (Where applicable)? vi) Review of monitoring records? vii) Corrective actions records? Is a documented and maintained verification schedule in place which includes the following: i) Activity performed? ii) Frequency conducted? iii) Personnel responsible? iv) Records which are maintained?		
18.	**Microbiological & Chemical Testing Schedule** Have microbiological and/or chemical hazards been identified during the hazard analysis process? If Yes: Is a schedule of testing in place to confirm that CCP(s) are under control? Is a schedule of testing in place to confirm that products or processes meet regulatory and customer requirements and to ensure quality and food safety parameters? Are sampling methodologies and test limits documented that include the corrective actions for test results that are		

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	outside the limits? Is testing conducted by suitably trained personnel? Are test results reviewed by a responsible officer within the organization and within a reasonable timeframe? Are corrective actions taken when results indicate that limits have been exceeded? Are records of these corrective actions kept?		
19.	**Shelf-Life Testing** Does the organization produce products with a shelf life of less than two years? If yes: Is a schedule of shelf life testing documented and maintained? Does it include the following: i) Tests to initially establish the shelf life? (which is indicated in the product description) ii) And from initial testing end of shelf life testing to verify that shelf life is being met? (above also applies for product shipped for further processing or rework) Are retention samples stored under typical conditions and in the commercial packaging for that product? Has end of shelf life testing occurred after the expiry date of the product? (Not to be tested on date of expiry) For frozen product has the end of shelf life testing been carried out after the end of the frozen period has been reached? Which of the following does the organization include as end of shelf life tests: i) Chemical testing? ii) Microbiological testing? iii) Organoleptic testing? iv) Physical testing? (e.g. weight loss during storage) Have end of shelf life results demonstrated that the parameters of the product at the end of shelf life continue to		

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	meet the finished product specification? (Therefore pathogen testing shall be carried out at the end of shelf life) For new products has the process for determining the shelf life and assumptions been clearly documented? Does the organization perform accelerated shelf life testing? (If yes, this shall not replace shelf life testing under typical conditions) Does the shelf life testing schedule include the following: i) Type of testing to be undertaken? ii) Testing to be carried out on each product, or product type? iii) Testing to be carried out at least annually or when a significant change in the product or process is undertaken? Are test results reviewed and signed by a responsible officer within the organization? Are corrective actions taken when results indicate that limits have been exceeded?		
20.	**Finished Product Assessments** Is there a developed, documented and implemented schedule for finished product assessments against finished product specifications which includes organoleptic, chemical and physical parameters? E.g. weight check, label check, taste, seal integrity. Are records of these assessments kept?		
21.	**Monitoring & Corrective Actions of Verification Activities** Does the organization review the results of verification activities? Is a documented schedule in place for reviewing monitoring activities and corrective actions of verification?		

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22.	**Customer Complaints** Does the organization have a developed, documented andimplemented process for reviewing customer complaints inrelation to food safety and quality issues? Is this process reviewed at least annually? Does this process include a customer complaints register? Are staff that are logging customer complaints suitable trained? Are records of review, investigation undertaken and corrective action kept? Are corrective actions prompt and appropriate?		
23.	**Record Keeping** Does the organization have a documented and controlled record keeping system relevant to the Food Safety Management System? Are the following records retained: i) Monitoring of CCPs? ii) Corrective actions taken regarding CCPs? iii) Changes to the Food Safety Management System? iv) Pre-Requisite Programs? v) Verification Activities? vi) Validation Activities? Are records retained for a minimum of 12 months or the shelf life of the subject product(s)? (Whichever is the greater) Are records protected from damage or loss, easily accessible and securely stored?		
TOTAL FOR HACCP REQUIREMENTS			