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Effective Recordkeeping System for Documenting the HACCP Plan

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Principle 6. Establish effective recordkeeping systems that document the HACCP plan.

INTRODUCTION

Records are written evidence through which an act is documented. The act of keeping records assures that this written evidence is available for review and is maintained for the required length of time.

Since part of the HACCP plan includes documentation relating to all critical control points (CCPs) identified in a food establishment operation, records are an integral part of a working HACCP system. All physical or chemical measurements of a CCP, any action on critical deviations and final disposition of any product must be correctly documented and kept on file.

All records that relate directly to these CCPs are to be made available to government inspectors upon request, for the HACCP plan clearly delineates which records fall into this category. Records that deal with the functionality of the HACCP system and other proprietary information are not necessarily required for review by these regulatory agencies. Records are the only reference available to trace the history of an ingredient, an in-process or a finished product. If questions arise concerning the product, a review of the records may be the only way to ascertain or even to prove that the product was prepared and handled in a safe manner in accordance with all the HACCP principles outlined in the company’s HACCP plan.

In addition, recordkeeping is a tool or mechanism by which an operator may learn of an equipment malfunction that could violate a critical factor and allow that operator to correct a potential problem. A record of this type provides a...
dual function by providing a history of the machine’s performance as well as an action taken to correct a deviation.

Record reviews must be conducted in-house by qualified staff members as well as by outside HACCP authorities such as consultants or regulatory inspectors in order to assure strict compliance with the criteria set at the CCPs. Careful review of well-documented and well-maintained records is an invaluable tool in indicating possible problems and allowing corrective action to be taken before a product health risk occurs.

Regulations specify that copies of all required records be retained at the processing facility for one year from the date of manufacture and for two additional years at a reasonably accessible location. Certainly it is prudent to keep all records at least as long as the intended shelf life of the product should this time extend beyond the three year requirement.

**Reasons for keeping records**

The reasons for keeping HACCP records relate to evidence of product safety with regard to the present procedures and processes, assurance of regulatory compliance, and ease of product traceability and record review.

Well maintained records provide the best evidence that procedures and processes are being followed in strict accordance with HACCP requirements. Adherence to the specific critical limits set at each critical control point is the best assurance of product safety. Documenting the data of those measurements results in permanent records regarding the safety of those products.

During regulatory compliance audits, company records may be the single most important source for data review, and, depending on the thoroughness of the records, inspectors can easily ascertain the adequacy of processes and procedures used at the facility in question. More importantly, accurate records also provide plant personnel with this documentation of compliance.

Since HACCP records focus only on safety-related issues, problem areas can be quickly identified because these records provide an uncluttered view of product safety issues. All HACCP records should be kept separate from quality assurance documents so that regulatory compliance officer will view only the product safety records during HACCP audits. In addition, HACCP records assist in identifying lots of ingredients, packaging materials and finished product should a product safety problem occur requiring a market withdrawal.

**TYPES OF HACCP RECORDS**

**Critical control point (CCP) records**

These records document the identification of specific hazards and the accompanying risk assessments associated with each CCP. These hazards could be