HACCP VALIDATION

Verification is defined, in the context of a HACCP principle, as those activities, other than monitoring, that determine the validity of the HACCP plan and that the HACCP system is operating in accordance with the plan. Validation is a subtype of verification, an essential but often overlooked component of HACCP. The NACMCF (1998) defines validation as follows:

"The element of verification focused on collecting and evaluation the scientific and technical information to determine if the HACCP plan, when properly implemented, will effectively control the hazards."

This definition assumes that the HACCP plan is properly implemented; that is, your HACCP plan is being complied with in your plant's day-to-day operations. This level of compliance is assessed through CCP and HACCP verification. In contrast, validation is not intended to determine compliance, but rather to determine if the plan is adequate for controlling hazards such that a safe product is produced. In simple terms, will the conditions written into your HACCP plan actually provide for a safe product?

HACCP validation is complex. It entails a documented review of the HACCP plan and goes far beyond verification to encompass all components of the HACCP plan and supporting prerequisite programs. A HACCP plan must be validated (reassessed) periodically. USDA-FSIS requires an annual reassessment at a minimum. Changes to the product or process, a system failure, failure of performance standards, and emergence of new information on hazards can also trigger validation of your HACCP plan.

The bottom line question of validation is "How can we as a poultry processor prove that our process will yield a safe product every time?" To answer this question, essential components of your HACCP must be revisited. First, the hazard analysis should be reviewed to determine if the conclusions that you drew from it are still correct. Secondly, your control measures need to be reviewed. This should entail a review of not only your CCPs, but also include a review of pertinent prerequisite programs that also contribute to hazard control. Thirdly, your processes need to be validated. Reviewing and citing the safety history of your product serves this purpose. Your microbiological data (e.g. E. coli results, etc.), USDA compliance, consumer complaints, and other objective data such as that taken from reputable scientific or technical journals/sources can be used to assess a product's safety history. Lastly, a report that documents that your HACCP plan has been effectively validated should be prepared and included as part of your HACCP plan documentation.

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