



Worthwhile Operational Guidelines & Suggestions

BROILER PROCESSING TIMELY INFORMATION - SEPTEMBER 2002

When was the last time you audited your HACCP System?

A lot of effort is put into collecting data for prerequisite programs and the HACCP plan. How much effort do you put into analyzing the data from all these programs? Do you link programs and look for trends or indicators? For example, what type of data do you collect to document the effectiveness of your sanitation program? Do you look for how these results may impact other programs such as your *Salmonella* tests, *E. coli* tests, employee training issues, NRs, consumer complaints, etc. Do you categorize your NRs and look for trends or see if data collected from any of your programs might have predicted the NR?

It is important for each plant to conduct internal audits of how well their HACCP System is working. Your HACCP System includes your HACCP plan as well as your prerequisite and other programs. When the CSO makes a visit to your plant to review and evaluate your HACCP plan, he or she will look at all your supporting programs, as well as your HACCP plan.

Recently, USDA held a public hearing in Omaha, Nebraska with lengthy discussions on physical hazards and HACCP prerequisite programs. The “rule of thumb” for whether or not a hazard should be a CCP or if it could be covered by prerequisite programs was discussed. The consensus seemed to be if the hazard was prevented by one prerequisite program it should probably be a CCP. If the hazard is not reasonably likely to occur due to a series (more than one) of prerequisite programs you have in place, then it would not need to be a CCP. The use of prerequisite programs to control hazards has always been an issue for some time. This “rule of thumb” seemed to be agreeable to most people at the meeting. USDA plans to publish a notice on *E. coli* in the *Federal Register* soon that will contain a lengthy discussion on prerequisite programs which should be useful.

When reassessing your HACCP plan this year, audit your entire food safety system and pay particular attention to validation interactions between your HACCP plan, prerequisite programs, and any other food safety related programs you have in place. These preventive activities will help you insure the safety of your products, better prepare you for the inevitable visit from the CSO and hopefully avoid an IDV visit.



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