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domestic and imported food products. The development of a HACCP plan and a HACCP system involves the application of five preliminary steps and seven principles.

These are Preliminary Steps-

- 1. Assemble the HACCP team.
- 2. Describe the food and the method of its distribution.
- 3. Identify the intended use and consumers of the food.
- 4. Develop a flow diagram which describes the process.
- 5. Verify the flow diagram.

Principles-

- 6. Principle No. 1. Conduct a hazard analysis. Prepare a list of steps in the process where significant hazards occur and describe the preventive measures.
- 7. Principle No. 2. Identify the critical control points (CCPs) in the process.
- 8. Principle No. 3. Establish critical limits for preventive measures associated with each identified CCP.
- 9. Principle No. 4. Establish CCP monitoring requirements.
- 10. Principle No. 5. Establish corrective action to be taken when monitoring indicates that there is a deviation from an established critical limit.
- 11. Principle No. 6. Establish effective record-keeping procedures that document the HACCP system.
- 12. Principle No. 7. Establish procedures for verification that the HACCP system is working correctly.

The written document that is developed from the application of these steps to the production of a food product is the HACCP plan. The next step is to implement the plan with the result being a HACCP system. Finally, the HACCP

system must be maintained through periodic verification and updating.

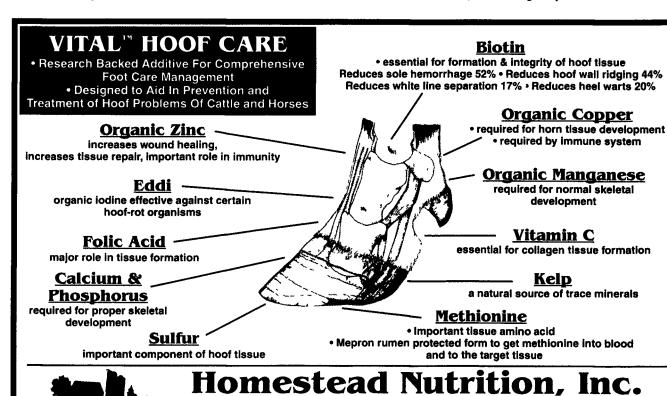
With a HACCP-based program in place, it is believed that a Government investigator can determine and evaluate both current and past conditions critical to ensuring the safety of the food produced by the facility by arriving on the scene at Step 12 in the program. Many groups have encouraged the application of these principles to every stage of the food system.

The HACCP concept is to prevent food safety problems before they occur. These food safety problems include biological (bacteria such as E. coli O157:H7, Salmonella), chemical (pesticides and antibiotics) and physical hazards (needles and shots). Yes, HACCP has been widely accepted and used in the food processing industry to ensure food safety, however can it be used for ensuring safe production of food animals and their products?

The Food Safety and Inspection Service of the USDA is inclined to believe that many of the quality assurance programs such as drug residue avoidance program have similar preventive concepts like those found in HACCP. Among Food Scientists and Veterinarians, there is a general consensus that application of HACCP as used for the processing industry for food animal producing farms might be difficult as: 1) management and production practices between farms and within farms vary considerably, 2) lack of an effective control point during production stage of the animals to eliminate or minimize the hazard, and 3) variation in the environmental conditions that cannot be controlled effectively, make it very difficult to actually develop a

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