

VISC

New Zealand Venison Industry Standards Council

To: All Holders

Subject: Industry Standard for a HACCP Plan, HACCP Competency Requirements and HACCP Implementation

Date: 27 September 2000

Enclosures: VISC1, Amendment No 1

1. Background

1.1 At a recent meeting of VISC it was agreed that it may be difficult for processors of feral game and co-products to implement HACCP by 1 November 2000.

It was agreed that implementation of HACCP by these sectors be delayed and a proposed date be advised later.

1.2 Section 6 of the standard has been amended to relate to farmed deer and farmed deer products (other than co-products) only.

2. Amendment Instructions

Attached is the relevant updated page for your Industry Standard for a HACCP Plan, HACCP Competency Requirements and HACCP Implementation.

Please sign off the Amendment Record, and file this update letter in the back of your manual for quick reference.

Remove old pages	Insert new pages
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3. Implementation

Immediate.


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Reference No: VISC 1

Date issued: 27 September 2000

Distribution: All holders of VISC IAS 8

Other references: VISC IAS 8; *Guide to HACCP Systems in the Meat Industry*; MISC Circular 99/MISC/7; TD 99/49, TD 99/66.

1. Background

- 1.1 The Hazard Analysis Critical Control Point (HACCP) system is firmly established worldwide as the foremost means of assuring food safety. It is taking an increasingly important role in international trade. Several countries have mandated HACCP requirements into their own legislation and expect importing countries to follow an equivalent approach.
- 1.2 Voluntary uptake of HACCP by the New Zealand Game and Game Meat Industry has been actively promoted by MAF since 1991. Industry interest has also been stimulated by customer interest in food safety and increasing commercial liability.
- 1.3 Considering the current status of HACCP internationally and its integration into impending legislation for animal products in NZ, the NZ Venison Industry Standards Council (VISC) has endorsed HACCP as an essential tool for the Game and Game Meat industry to use in association with game and game meat production.
- 1.4 Documented and effective prerequisite programmes, (see IAS 8 for guidance) are essential to the success of any HACCP plan, and are expected to be operating prior to implementing HACCP at a premises.
- 1.5 Definitions pertaining to this standard can be found in the publication "Guide to HACCP Systems in the Meat Industry".

1.6 This Industry Standard will be reviewed as necessary by VISC.

It is strongly recommended that industry be guided by the publication “Guide to HACCP Systems in the Meat Industry” when developing and implementing the HACCP plan.

2. Aim

- 2.1 To establish the New Zealand Game and Game Meat Industry standard for a HACCP plan, HACCP competency requirements and HACCP implementation.
- 2.2 To state the requirements for Game and Game Meat premises where:
 - A new premises starts up and requires a HACCP plan;
 - A premises implements a new process and therefore has no previous background experience and/or data.
- 2.3 To state implementation dates for the Game and Game Meat industry.

3. Development of a HACCP plan

The necessary steps to follow when developing a HACCP plan or deciding that one is not required are found in:

- Figure 1 - Development of a HACCP plan
- Figure 2 – Required elements of a HACCP plan
- Figure 3 – HACCP plan not required (also covers provisional hazard ID)

FIG 1 Development of a HACCP plan

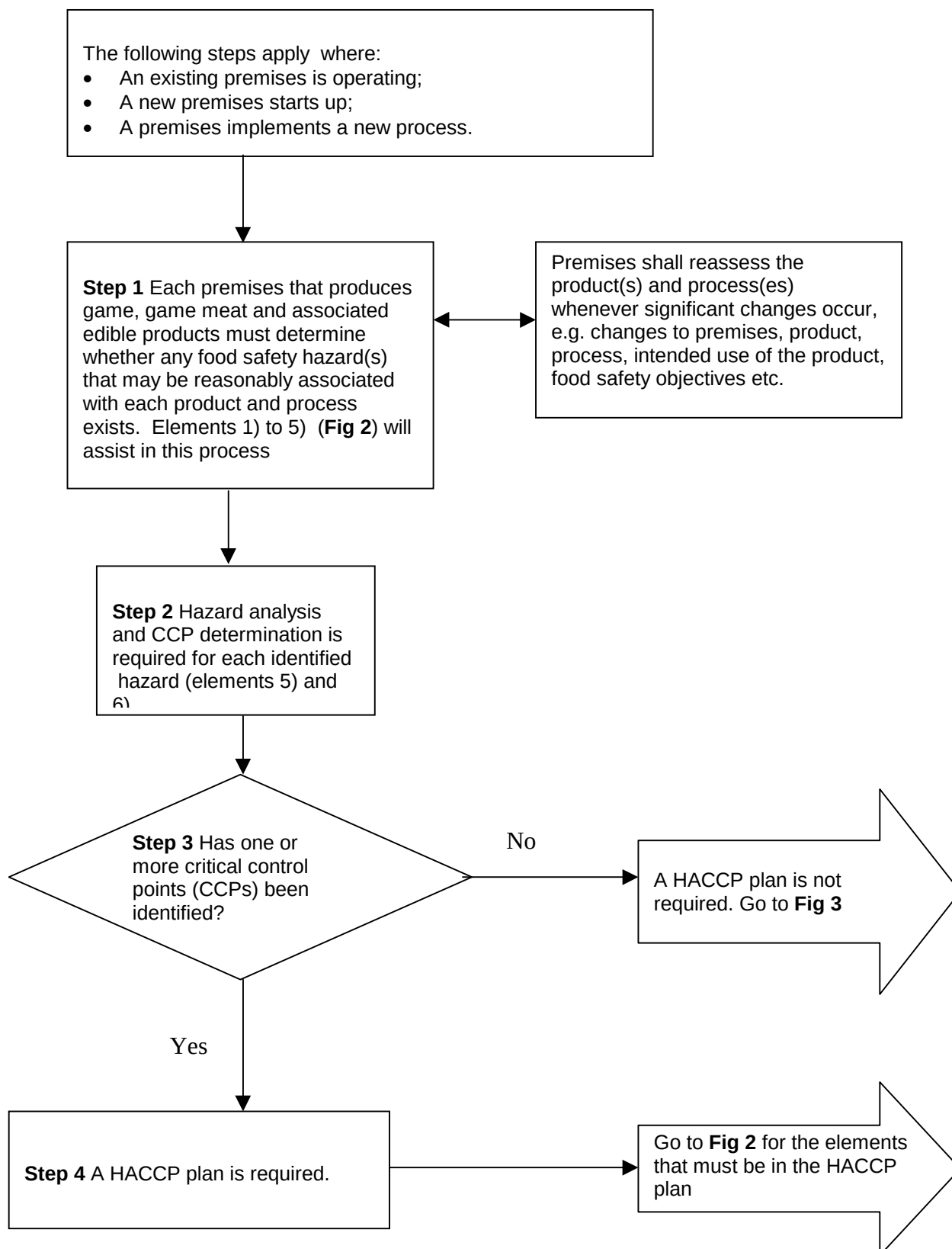


Fig 2 Required elements of the HACCP plan

Element 1: The scope of the HACCP plan (covering the extent of application, including product, process and whether any company/regulatory integration is present)

Element 2: A description of the product, its intended use and the intended consumer if known (creating a “risk profile” and assisting in identifying food safety hazards)

Element 3: The food safety objectives (FSOs) that have been set for the product taking into account element 2

Element 4: The description of the process covering all process steps (e.g. process flow diagram or chart)

Element 5: The hazard identification and analysis (covering those biological, chemical and physical hazards reasonably likely to occur)

Element 6: Identification of the critical control points (CCPs), if any, needed to control or eliminate those hazards found to be unacceptable in relation to the FSOs set

Element 7: The critical limits that have been established for each CCP

Element 8: The monitoring procedures required to demonstrate control of the CCP

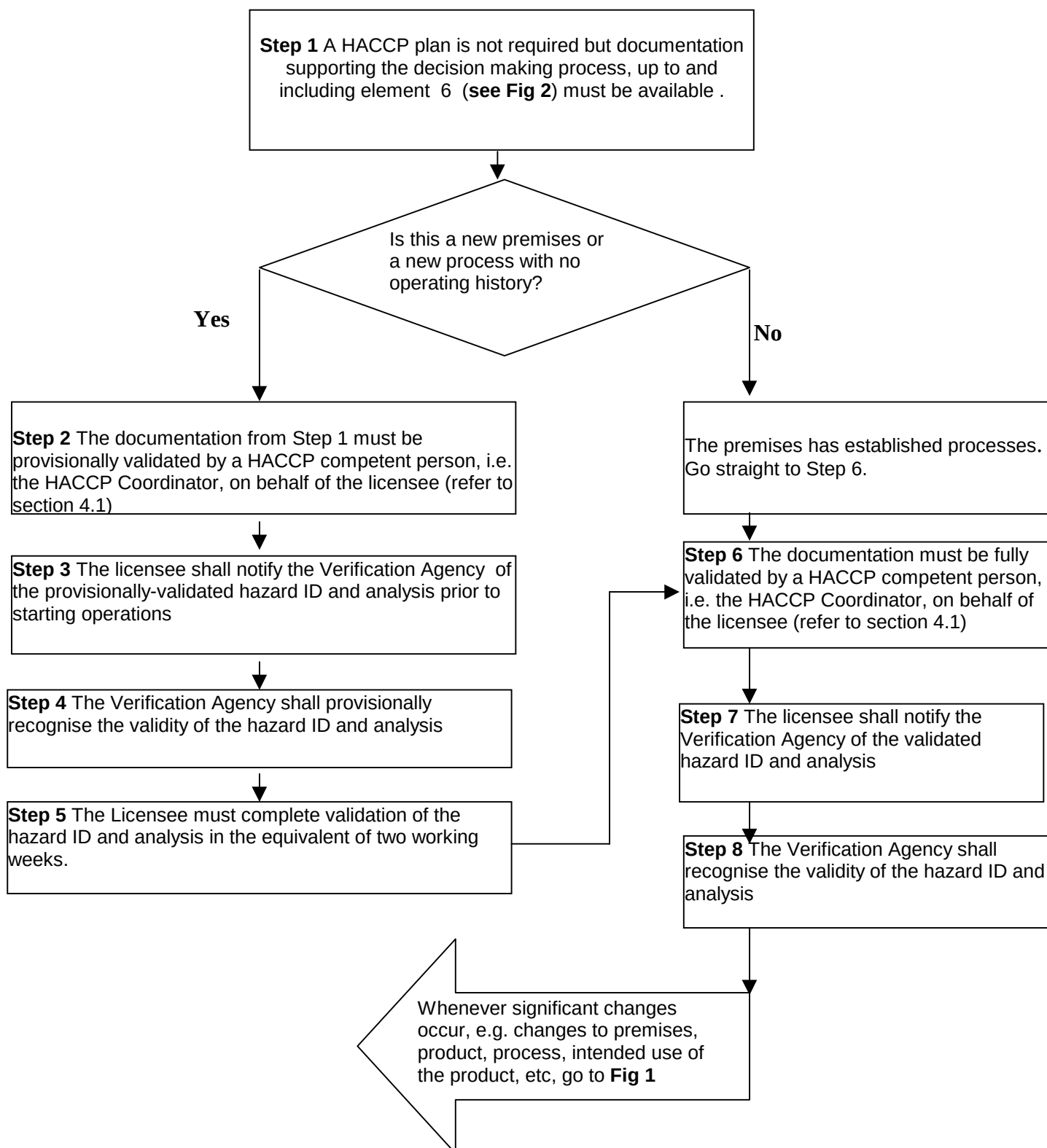
Element 9: The corrective action procedures (including measures to:

- Regain control;
- Prevent recurrence
- Control product disposition

Element 10: The confirmation procedures including validation, ongoing review and revalidation when significant changes occur (Refer IAS 8 for guidance)

Element 11: Documentation and record-keeping appropriate to the above elements (Refer IAS 8 for guidance)

Fig 3 HACCP plan not required (also covers provisional hazard ID)



4. HACCP competency requirements

Licensee responsibilities

- 4.1 Each premises required to implement this industry standard, shall have access to a HACCP competent person known as the “HACCP coordinator” who has attained the New Zealand Meat Processing Industry Training Organisation (MPITO) HACCP competency standard. This standard is known as the National Qualification Framework Unit Standard No 12626: “Coordinate the development and verification of a HACCP plan for a meat processing operation”. This person need not be resident at the premises.

It is strongly recommended that individual premises have at least one person on-site who has undergone HACCP training or achieved competency to a minimum of that expected for the MPITO Unit Standard 12625 “Supervise a meat processing operation under a Hazard Analysis Critical Control Point (HACCP) System.”

- 4.2 The HACCP coordinator shall be responsible for ensuring that the following activities are carried out effectively at each premises requiring a HACCP plan:

- The development of the HACCP plan;
- The implementation of the HACCP plan;
- The ongoing confirmation of the HACCP plan.

Verification Agency personnel responsibilities

- 4.3 Verification Agency personnel are required to recognise as valid by means of an audit:
- a) A validated hazard identification and analysis (refer to Figure 3); and
 - b) A validated HACCP plan (Refer to Figure 4).
- 4.4 Verification Agency personnel undertaking recognition of validation audits as required by Section 4.3 shall have attained the HACCP competency standard (see section 4.1). They also shall have recognised audit qualifications (i.e. recognised by JASANZ or equivalent accreditation body), technical expertise and industry experience appropriate to the audit.
- 4.5 Verification Agency personnel undertaking compliance audits of a HACCP plan that has been recognised as valid need not have the HACCP competency standard but must have the audit qualification as per section 4.4. However, it is recommended that these personnel be trained in HACCP to a level at least equivalent to MPITO Unit Standard 12625 “Supervise a meat processing operation under a Hazard Analysis Critical Control Point (HACCP) System”.

Refer to Appendix One - Types of Audit

5. Implementation of the HACCP plan

Licensee responsibilities

5.1 Responsibilities and authorities must be identified by the licensee to enable the validation, sign off and subsequent implementation of the HACCP plan. This includes the following specific activities:

- Monitoring;
- Corrective action;
- Confirmation - validation, ongoing review, revalidation (see Appendix Two).

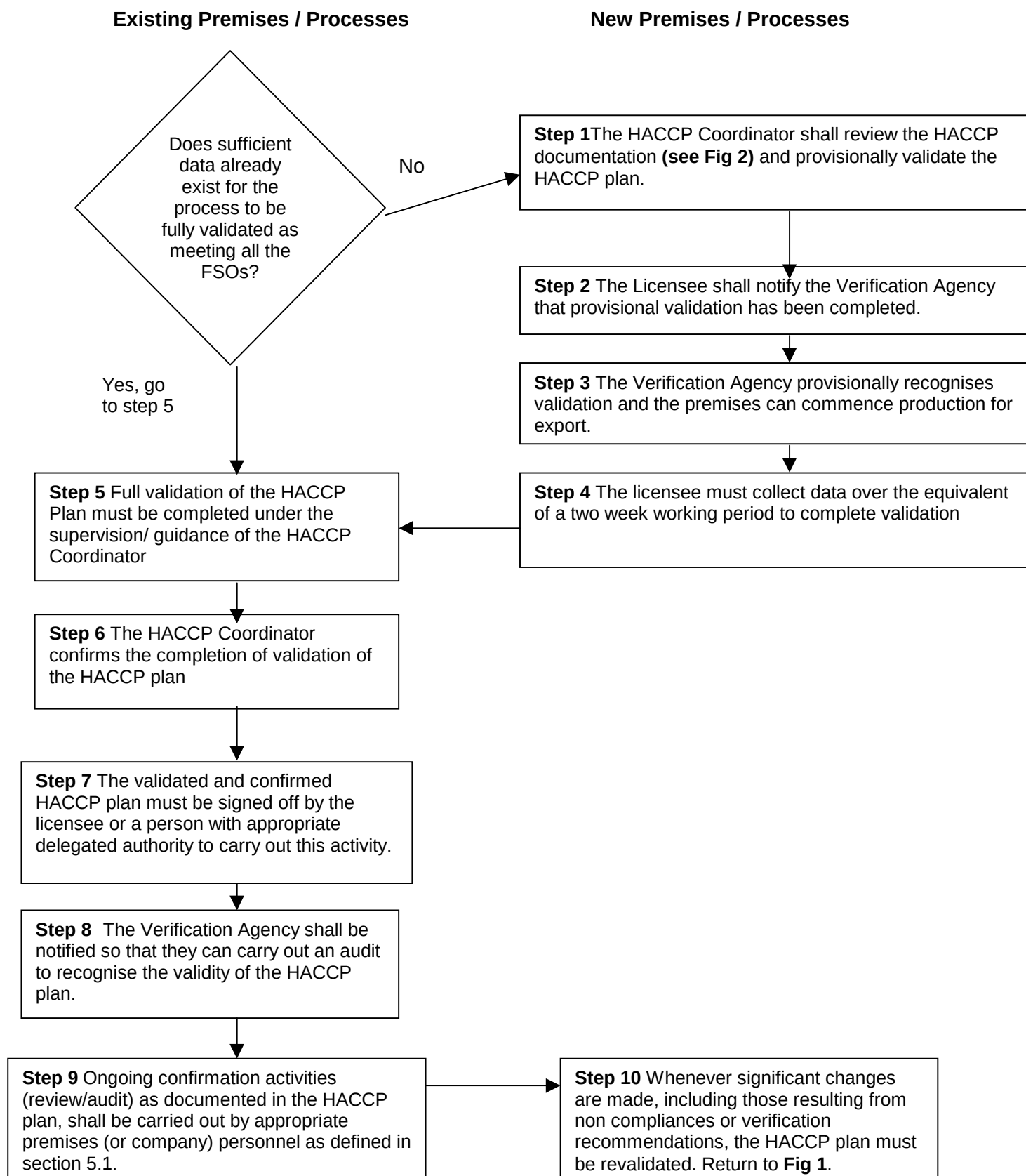
IAS 8 can give further guidance on general requirements.

5.2 It is recognised that a premises will need to run its process before completion of the validation procedure to ensure an effective HACCP plan.

5.3 The steps that must be followed for implementation of a HACCP plan for:

- A new premises and process (also see Appendix Three);
 - An existing premises and process
- are shown in Figure 4: Implementation of the HACCP plan.

Fig 4: Implementation of the HACCP plan



Verification Agency responsibilities (also see Appendix Two)

- 5.4 Verification Agency personnel (see section 4.3) shall carry out an audit to recognise the validity of the HACCP plan consequent to steps 2 and 8 in Fig 4, whichever is applicable. Recognition of a valid plan shall be given in writing (audit report) to the licensee.
- 5.5 Pre-HACCP verification activities (compliance reviews/audits/off-chain checks) concerning the process and product must continue until the HACCP plan has been recognised as valid.
- 5.6 Once the plan has been recognised as valid, performance-based verification (PBV) of HACCP plans shall be implemented, starting at monthly intervals. As a minimum, these may be partial audits. This does not include audit of prerequisite programmes which must continue in accordance with existing requirements. Market access requirements must be taken into account where applicable.

6. Implementation of this standard

- 6.1 Premises must consider products in the following processing categories when undertaking a hazard identification:
- Slaughter and dressing of farmed deer.
 - Further processing of farmed deer (excluding co-products).
- 6.2 Implementation date: 1 November 2000.

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Appendix One

Types of Audit

Audit: A systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives. (derived from ISO 8402)

Guidance in carrying out HACCP plan audits can be found in the "Guide to HACCP Systems in the Meat Industry" section 7.

1. Recognition of validity

Initial full audit carried out by Verification Agency personnel in order to recognise the validity of the HACCP plan.

2. Review of validity

Full or partial audit by Verification Agency personnel in order to recognise the validity of changes to a HACCP plan.

3. Compliance audit

Audit carried out by Verification Agency personnel to determine whether actual practices comply with the documented procedures in the validated HACCP plan.

4. Internal audit

Audit carried out by the licensee to evaluate the implementation of the HACCP plan. The person or persons carrying out the audit should be independent of the system under consideration.

5. Extrinsic audit

Audit carried out by customer, regulator or third party on a company to assess compliance with the HACCP plan.

6. Full audit

Audit covering all aspects of the HACCP plan and selected prerequisites (selected by the auditor). A full audit would be necessary on the following occasions:

- initial audit (i.e. validation audit);
- where substantial changes have been made to the product or process;
- according to a minimum frequency as stipulated by a standard or a regulatory authority;
- where the last audit indicated a need for it.

7. Partial audit

Audit covering selected components of a HACCP plan. This must include a record review.

Appendix Two

Confirmation and Verification Activities

Who	Activities
Licensee	Confirmation 1. Hazard ID and analysis Validate the documented hazard ID and analysis. Recheck when significant changes occur. 2. HACCP plan Apply methods, procedures (review/audit) and tests in addition to those used in monitoring to determine: • The effectiveness of the HACCP plan in delivering expected outcomes (food safety objectives) i.e., validation; • Compliance with the HACCP plan; • Whether the HACCP plan needs modification, i.e. revalidation.
Verification Agency personnel	Verification 1. Hazard ID and analysis Audit the validated hazard ID and analysis and recognise the validity. 2. HACCP plan Audit the validated/revalidated HACCP plan and recognise the validity. Carry out compliance audits on the HACCP plan that has been recognised as valid.

Appendix Three

Decision Tree – Clarifying role of licensee, Food Assurance Authority and Verification Agency in conjunction with process standards

Required product



Q1: Is there a process standard available? → Yes, go to Q3.



No



Licensee develops trial protocol (Refer to IS 8 for guidance)



Licensee obtains D.G. approval (provisional recognition)



Licensee runs trial



Licensee reviews results. Go to Q2.

Provisional recognition of process standard by the Food Assurance Authority before and during trial.

Verification Agency personnel audit using pre-existing procedures during trial.

Q2: Are the results satisfactory? → No, licensee revises protocol. Licensee resubmits for D.G. approval above.



Yes, go to Q3.

Q3: Is a HACCP plan required? → No, licensee follows IAS 8 to develop and implement process. (Refer to Hazard identification and analysis.)



Yes



Licensee develops HACCP plan



Licensee runs HACCP plan*

Verification Agency personnel/Technical Supervisor intervention and control using pre-existing procedures until the plan is recognised as valid.



Licensee validates HACCP plan



Verification Agency personnel recognise HACCP plan as valid.

* Time period for validation dependent on whether data is available from an existing standard (i.e., historical data, no change to product/process therefore immediate validation) or whether new information has to be generated.