

8.1—Hazard Analysis

The development of a HACCP system begins with the hazard analysis. This initial step has six sub-tasks: (1) assembling the HACCP team; (2) describing the processor's food products; (3) identifying the likely uses and consumers of a food product; (4) developing a process flow chart; (5) verifying the flow chart; (6) and conducting the hazard analysis, which focuses on where in the process unacceptable hazards may exist and how such hazards may be prevented.

8.1.1—Sanitation/Good Manufacturing Practices as HACCP Precursors

Before turning to the first step of developing and implementing a HACCP system, attention must be paid to sound sanitation and compliance with good manufacturing practices (GMPs). A facility that is out of control in terms of sanitation and/or GMP compliance will never be able to effectively adopt a HACCP system. This is because failure to maintain a sound operation will introduce countless hazards which cannot be effectively controlled under a HACCP system. For example, failure of employees to wash their hands before handling ready-to-eat products introduces the possibility of contamination, that will not be controlled before the product is consumed. Likewise, failure to properly maintain equipment invites chemical contamination from leaking fluids.

There are more than enough hazards to control in a well-run operation, so that including hazards that are readily avoidable through sound production would overtax the HACCP system. Thus, before even beginning to develop a HACCP system, the processor would be well advised to review its sanitation and processing practices. The processor may consider contracting with an outside third party to conduct a review of the company's sanitation and operations and get those attributes in shape before proceeding to HACCP development.

For those processors that will be covered by the mandatory seafood, meat, and poultry HACCP requirements, the regulations expressly contain provisions dealing with sanitation requirements.

8.1.2—Assembling the HACCP Team

The HACCP team is charged with development of a HACCP plan. A HACCP plan, according to the NACMCF, is “the written document which is based upon the principles of HACCP and which delineates the procedures to be followed.” The team also verifies that the plan is working and conducts periodic evaluations of the plan.

To develop a HACCP plan, a team must be able to identify potential hazards and determine which pose unacceptable risks. It must recommend controls and establish monitoring procedures. The team must, in addition, recommend appropriate corrective actions to be taken when there is a