

HOW TO BEGIN DEVELOPING A HACCP SYSTEM

The development, implementation and maintenance of a HACCP system requires planning and commitment. Implementing a HACCP system is not something that can be accomplished overnight. Most HACCP systems take months or even a year or more to implement. Be prepared for a long-term project; trying to implement a HACCP system with a very short deadline can lead to corner cutting, and frequently the ultimate audit result is failure. Planning ahead and preparing to implement HACCP over a long period of time with clear milestones will vastly reduce this risk.

Once you decide that you are ready to implement HACCP, you should:

1. Obtain management commitment
2. Form a HACCP team, and assign a HACCP Team Leader
3. Acquire necessary training
4. Develop an implementation schedule
5. Obtain the necessary resources
6. Develop and implement prerequisite programs
7. Develop and implement HACCP plan(s)
8. Perform HACCP system maintenance, including verification and validation
9. Apply for certification

These are the main steps that you should go through, regardless of facility size, processing complexity, or food produced, when implementing a HACCP system. Remember that this is just a summary.

1. OBTAIN MANAGEMENT COMMITMENT

Many HACCP experts have stated that the single most frequent reason a HACCP system fails is lack of management commitment.

A. What Is "Management Commitment"?

Management commitment is the endorsement and involvement of the facility's top management (generally, this means the owner or president/CEO) in the decision to not only proceed with HACCP but also stick with it when times may become trying. When implementing a HACCP system, decisions regarding a facility's financial, time, and labour resources will need to be made. Many major financial decisions commonly involve the choice between spending now or spending later. Low, short-term costs may result in higher, long-term costs. Conversely, high short-term costs can result in low long-term costs. For example, permanently improving the floor drainage in a problem area can be very costly to fix. Alternatively, staff could spend time ensuring that no water accumulates in the problem area by consistently monitoring and removing any pooled water. Over time these labour costs, as well as the increased risk of cross-contamination, will outweigh the costs of fixing the floor permanently. So when do you plan to permanently fix the floor? Decisions of this nature will need to be made by individuals who are committed to the program and have the authority to make such decisions.

It is not necessary for senior management to be part of the HACCP team—although this is always a good idea but they should always be accessible to make decisions in a timely manner. Senior management must be dedicated to HACCP implementation from the onset. If there is a lack of commitment, including lack of financial or labour resources, the HACCP system may not be properly implemented. This may lead to an increased chance of system failure. Upper management must be fully aware of HACCP and the benefits to be realized through a HACCP system. They also need to understand the challenges the facility may face.

B. How Can You Gain Management Commitment?

Management commitment can be gained by promoting the benefits of HACCP to

management. Point out that HACCP will likely become a cost of doing business in the food processing industry.

- Talk to your customers, and inform management of their view. Most companies are very supportive of their suppliers implementing HACCP and, in some instances, will provide some assurance about the future of the business relationship (such as new contracts, premium prices).
- Try to find out if your competitors have HACCP. If they do, they may have a competitive advantage, possibly jeopardizing your future business. If not, you could have the competitive advantage through implementation of a HACCP system.

C. How Is Management Commitment Demonstrated?

Management can establish that they are committed to implementing HACCP in a number of ways. From management's point of view these include:

- Openly stating to facility employees during meetings and through other avenues (e.g., signage) that HACCP is important and will be implemented
- Initiating and attending HACCP team meetings or HACCP-related training sessions
- Publish a signed management commitment statement and food safety policy
- Making sure that they themselves are aware of and adhere to all applicable HACCP-related procedures and policies whenever they are in the facility
- Purposefully determining and allocating resources to the HACCP coordinator for the development and implementation of HACCP
- Requesting and reviewing periodic progress reports on the status of the HACCP system
- Implementing disciplinary consequences for facility employees who fail to fulfill their HACCP responsibilities
- Attending HACCP audit opening and closing meetings and introducing themselves to the auditors
- Visibly supporting the HACCP team when difficult decisions need to be made.

All of these items will clearly send a message to the HACCP team, facility employees and all external parties that review the HACCP system that management is involved and cares about the program

2. FORM A HACCP TEAM, AND ASSIGN A HACCP TEAM LEADER

The HACCP team is the group of people involved in the development, implementation and maintenance of the HACCP system. There is no requirement for the number of people on the HACCP team, and the number will vary based on the complexity of the process and the number of employees. At minimum, the HACCP team can be made up of one person who oversees the development of the entire HACCP system. Obviously, the person in this role will need to have a very good understanding of the facility and its products, as well as HACCP.

This type of situation usually occurs in very small plants with a limited number of staff and/or resources and very rarely occurs in large plants. Forming the HACCP team with the right personnel for the job is a key step toward implementing an effective HACCP system. Preferably, the HACCP team should comprise individuals with expertise from different areas of the plant, such as:

- Quality assurance
- Production
- Maintenance
- Sanitation
- Distribution and receiving
- Management

The HACCP system encompasses all areas and aspects of the facility. Including people with expertise and knowledge of all current plant operations and conditions is important because they will:

- Assist with developing HACCP policies and procedures for their area of expertise

- Be aware of existing policies and procedures that do not need to be reinvented to meet HACCP requirements
- Likely play a role in carrying out HACCP activities in their area.

One person on the HACCP team should serve as the HACCP Team Leader. This person is responsible for overseeing the overall development and implementation of the system. The HACCP Team Leader should have a solid understanding of HACCP and how it works, and a working knowledge of the facility and the products manufactured. One of the main roles of the HACCP Team Leader will be to monitor the team's progress with respect to HACCP implementation.

If no company employees are knowledgeable about HACCP, there are a couple of possibilities:

1. The HACCP Team Leader can source and complete pertinent HACCP training
2. Hire a HACCP consultant to facilitate the whole process.

Consultants are independent firms that can provide knowledge and support during HACCP implementation. If you do your homework and hire the right consultant, you can access a valuable and effective HACCP knowledge resource. When hiring a HACCP consultant, remember to:

- Ask for, and check, references
- Ask for, and look at, samples of other HACCP work the consultant has done
- Ask for a written quote for any proposed work
- Ask how closely the consultant will be working with plant employees and how often the consultant will be in the facility
- Ensure the consultant understands what material you wish to remain confidential and have him or her sign a confidentiality agreement
- Ensure that you have a contract for any services the consultant is hired for
- Ensure that you understand the consultant's responsibilities, if any, following implementation.

3. ACQUIRE NECESSARY TRAINING

All personnel need to understand their role in ensuring food safety and follow applicable company policies and procedures. It may be apparent that the individuals on your HACCP team, while very skilled with respect to their current duties, do not have a working knowledge of HACCP. Different personnel will require varying levels of HACCP knowledge. HACCP Team Leaders should be knowledgeable of:

- Food safety hazards common to their products and processes
- Good Manufacturing Practices applicable to their facility
- Applicable regulatory requirements
- Importance of management commitment
- Use of HACCP for the manufacture of safe food
- Purpose of prerequisite programs
- Purpose of HACCP plans
- HACCP principles, including hazard analysis and determining critical limits
- Concepts of monitoring, corrective actions and verification
- Importance of record keeping
- Audit principles and internal audits
- Process for certification and recognition.

At minimum, management should be knowledgeable of:

- The importance of their role with respect to HACCP
- Benefits and costs of HACCP
- Resources required for HACCP implementation and certification.

Other personnel, should, at minimum, be knowledgeable of their roles and responsibilities within the HACCP system including:

- Importance of appropriate control measures

- How to perform specific tasks (e.g., monitoring, taking corrective actions, record keeping).

This knowledge may be acquired in many different ways, such as:

- Taking food safety and HACCP-related courses
- Applying food-processing environment experience
- Being aware of regulatory requirements
- Researching necessary topics (e.g., reading scientific literature)
- Communicating with appropriate experts
- Hiring HACCP trainers or consultants.

Many HACCP trainers would be willing to perform HACCP training at your facility. If you choose this route, you may want to ask the trainer to include examples specific to your facility in the training material. It is also possible for the HACCP Team Leader to provide training to the rest of the facility employees once the Team Leader is adequately knowledgeable and comfortable in delivering HACCP training.

4. DEVELOP AN IMPLEMENTATION SCHEDULE

The HACCP Team Leader should use his or her knowledge of HACCP to determine the major tasks required to implement HACCP in the facility. Next, the HACCP Team Leader should present to the HACCP team a rough explanation and outline of the tasks to be completed.

The number and rigor of these tasks may vary depending on existing food safety programs within the facility. With this rough idea of the major tasks, the HACCP team should develop an implementation schedule and itemize each of the tasks. An implementation schedule is simply a chronological schedule or list of events that need to take place in order for a HACCP system to be developed and implemented successfully. Each event or task on the schedule should include an estimated start date and completion date. Be sure to err on the side of caution and allow more rather than less time—no one can predict the roadblocks you may encounter. Once the major tasks have been itemized on a schedule they should then be assigned to the individuals best suited to complete them (usually the other HACCP team members). If delays completing certain tasks occur, the HACCP Team Leader should review the implementation schedule and make appropriate changes to other tasks that are also affected by the delay. In many cases, especially with small HACCP teams, many or all of the major tasks may be assigned to the HACCP coordinator. This is fine; just be sure that the time allotted to complete the tasks is feasible for one person.

5. OBTAIN THE NECESSARY RESOURCES

Once the schedule and task lists have been created and assigned, a rough list of the resources that are, or may be, required can be formed. This may include:

- Further knowledge resources such as consultants, engineers or specific area experts
- Sanitation or pest control services
- New equipment
- Monitoring devices (e.g., thermometers)
- New construction materials or services
- Plant or personnel supplies (e.g., hairnets, waste containers)
- Treatment chemicals (e.g., for water treatment)
- Laboratory services and/or supplies

Keeping an eye on the cost of implementation as each item is checked on the list will help the budgeting process. Tracking these costs, keeping a budget and providing frequent reports to management may be useful. It may be impossible to determine or foresee all of the resources that may be required for HACCP implementation. However, having a preliminary list that itemizes resources required will prepare management in advance, allowing them to make financial decisions.

6. DEVELOP AND IMPLEMENT PREREQUISITE PROGRAMS (Clause 6 SANS10330)

Prerequisite programs are developed and implemented using SANS10049 as defined in SANS 10330.

7. DEVELOP AND IMPLEMENT HACCP PLAN(S)(Clause 8 SANS10330)

HACCP plan(s) are developed and implemented using SANS 10330.

8. PERFORM HACCP SYSTEM MAINTENANCE, INCLUDING VERIFICATION AND VALIDATION

After developing and implementing a HACCP system, it must be maintained on an ongoing basis. This includes ensuring that the system is effective and functioning as intended (these are the concepts of validation and verification). It is important that you record any changes or additions.

9. APPLY FOR CERTIFICATION

Once the HACCP Team Leader is confident that the HACCP system is complete and effective, your organization can apply for certification. The certification process for the HACCP is administered through various certification bodies, e.g. CMI (Africa), SGS, SABS, PPECB, DQS.

The certification process involves objective and independent auditors visiting your facility to assess your HACCP system. If the system meets the SANS10330 requirements and is being followed as written, your system will be certified.