

Case reikwijdte

RI = Risk identification / NC = non compliance / PRP = pre- requisite program / CB = certifying body / Standard § = . Dit is het nummer van de norm.

| Year | standard § | Case | nr | Statement | CONSENSUS | Standard § suffiient? |
|------|-----------------|--|----|--|-----------|-----------------------|
| 2012 | 5.5 / 5.4 (2.8) | <p>Case 1 Allergens</p> <p>During an audit of a company, who is producing fried chicken products, the auditor finds a plastic container from 10 liters with proximally 5 liters peanut sauce.</p> <p>This container was placed in a storage room for raw materials. Not on an isolated place, but not on a way that cross contamination of other raw materials would be likely.</p> <p>The container was slightly contaminated on the outside (with peanut butter). According to the production manager, this container was used for an on site-production trial of chicken skewers with peanut sauce for one of the customers. The customer had not ordered this product, and the container with peanut sauce was a leftover.</p> <p>Normally this company works with other allergens, but not with peanuts or nuts. The company has a risk analyses for the work with allergens but within the product development procedure no food safety risk analysis is required.</p> | 1 | <p>1. There is no risk analyses or risk assessment report for the trial that includes the risks for processing peanut butter and the risk of cross contamination to other products: >> Major non conformity (5.5)</p> <p>2. Storage of partly used raw materials is not sufficient. A container with peanut butter sauce was (slightly) contaminated on the outside, therefore causing the risk for cross contamination. >> Minor non conformity (5.4 (2.8))</p> | OK | OK |
| | 5.6 | <p>Case 2 Raw materials</p> <p>An industrial pastry baker is using margarine for the production of confectionery products that was delivered by a national well known margarine producer.</p> <p>The specification of the margarine says that this product contains vegetable oils, without saying what kind of vegetable oils. This is not necessary according to the Regulation 2000/13 EG. But it is well known that some vegetable oils are vulnerable for contamination with PAH's (Polycyclic Aromatic Hydrocarbons in The</p> | 2 | <p>The control measure for PAH's is not sufficient. The Fediol site only states hygiene requirements and therefore does not guarantee the absence of Pac's.</p> <p>>> Minor non conformity 5.5</p> | OK | OK |

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| | | <p>Netherlands known as PAK's). Especially coconut oil, palm oil and sunflower oil. The supplier of the margarine directs the pastry baker to the website of Fediol and declares that Pac's are no problems according to these publications. However further investigation shows that Fediol describes the risks and hygiene code but is not to be considered a chain control system.</p> <p>Control according to "Infoblad 64" of the new Food and Consumer products Authority was not necessary.</p> | | | | |
| | 5.5 | <p>Case 3 Process.</p> <p>During an audit of a company, who is producing fried chicken skewers with different sauces, the auditor checks the risk analyses en risk evaluation of the company. These products are fried (single layer per case) in a combi steamer with a fixed program on time and temperature. The control of the right core temperature of the skewer is not pointed out as a Critical Control Point (CCP) and therefore no registration takes place. As substantiating for this decision the company declared that the surface of this chicken blocks (1x1x1 cm. in diameter) was so brown colored by the heating that chicken blocks are always cooked-through. This was also proven by a regularly verification of the core temperature.</p> | 3 | <p>Considering the microbiological risks the heating process should be considered to be a CCP. In not all cases it can be proven that all skewers were heated sufficiently.</p> <p>>> Major non conformity 5.5.</p> <p>Note. Considering a proper validation a sensoric monitoring might be sufficient to control this CCP.</p> | OK | OK |
| | 5.5 | <p>Case 4</p> <p>According to the risk analyses and risk evaluation of a company has pointed out a Critical Control Point (CCP), which has nothing to do with a possible risk of public health. During an audit it turns out that the company was not in control of</p> | 4 | <p>If the company can show that the risk analysis has been executed properly with enough depth the so called 'CCP' does not suggest that the basis of the system is in solid . Therefore a minor NC should be</p> | OK | OK |

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| | | <p>this CCP during production.</p> <p>Example 1: In a pig slaughterhouse fecal contamination during the slaughter process is identified as CCP because in the past the FS authorities (VWA) urged the company to do so. Nowadays however, according to the company, the VWA does not require anymore that this should be identified and monitored as a CCP. The company however still identifies this as CCP and monitors it to make sure that “staff is aware that fecal contamination prevention should be controlled 100%” The critical limit is “no fecal contamination”. During the audit several spots with fecal contamination were found in the cooling cell on carcasses (<i>after</i> the CCP monitoring point). However the number of non conformities does not exceed the standard within the sector and therefore does not suggest that best practices were not implemented.</p> <p>Example 2: The company (storage and trade of glass jar products) has one CCP: “glass break”. All products are closed and therefore no contamination risk exists. The CCP instruction reads that broken products should be removed immediately and that this should be recorded. During the audit it was shown that pieces of broken jars had been swept together on a pile. At the end of the day they were to be removed. No records are kept of broken glass.</p> | | <p>stated (5.5) since the HACCP plan does not solely focuses upon significant food safety risks and therefore is not completely risk based.</p> <p>If the risk analysis as a whole is considered insufficient (due to e.g. lack of knowledge and/or structure) a major NC should be stated.</p> | | |
| 2012 | 5.10 | <p>A dairy trader asks its suppliers that milk powder in bulk (minimal quantity 20 tons) should be accomplished with either a CoA or a CoC which states or shows that Salmonella is absent in 25g. Also other pathogens are mentioned e.g. E.Coli. Some CoA's were shown, however the labs are not always accredited (e.g. 17025) and the trader</p> | 5 | <p>Minor 5.4 (3.3.2). QC monitoring of ingredients required. According EC 2073/2005 the analysis method is prescribed: it cannot be shown that these methods or other approved methods like EC 17025 certified are used.</p> | <p>No. In 5.8.1 the monitoring of CCP's is documented, not necessarily other monitoring/analyses (like in this case).</p> | |

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| | | did not investigate the reliability of the related labs with regards to the used methods. The dairy trader has no own micro monitoring program: the QA manager says that its compliance with micro requirements can be shown from supplier and client micro results. | | | | |
| | n.a. | <p>Case 6</p> <p>A production facility that produces fruit concentrates is HACCP certified. Their production processes are fully audited by internal auditors.</p> <p>The purchase department, lab and HR department are all managed by the central, corporate organization.</p> <p>These departments control the purchase of raw materials, the training of staff and analyzing of products of the certified production facility. For these supporting departments <u>no</u> internal audits are held either by the production facility either by the corporate organization it self. The scope of the HACCP certificate is "the production of fruit concentrates"</p> | 6 | <p>Considering the purchase, lab and training to be outsourced processes internal audits do not have to take place. However supplier assessment and evaluation should take place regularly and this process also should be audited internally by the production facility. >> No non conformity</p> | OK | OK |
| | 5.8.1 | <p>Case 7</p> <p>During the audit of the yearly verification of the HACCP system of a transporting company the auditor notices that with regards to the CCP's product temperature at loading and product temperature at dispatch the verification states:</p> <p>Conclusion Loading: During 5862 times loading in case of 2.4% (143 times) there were deviations of which 4 times exceeding legal limits: Frozen (-9°C, -10°C en -14°C) Cooled (8°C) These have been handled appropriately</p> | 7 | <p>In not all cases it could be shown that the CCP's were adequately controlled. Considering the risk a minor non compliance should be stated (5.8.1).</p> <p><i>Note. The company should reconsider the monitoring method and risk analysis. Doe this really concern CCP's?</i></p> | OK | OK |

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| | | <p>according to customer demands. Rest of the deviations was the result of :</p> <ol style="list-style-type: none"> 1. not registering the product temperature by the chauffeur (forgotten or unable to perform measurement); 2. wrong product category used (e.g. flowers in stead of fish on ice) and therefore no temperature has to be registered; 3.wrong temperature due to falsely using +/- <p>Conclusion dispatch: During 14419 times dispatch 1.9% (271) there were deviations with regards to the product temperature of which 8 times exceeding legal limits: Frozen (-10,5°C, -11°C, -12°C (2x) -15°C (3x) and -14°C) These have been handled appropriately according to customer demands.</p> <p>Rest of the deviations was the result of :</p> <ol style="list-style-type: none"> 1. not registering the product temperature by the chauffeur (forgotten or unable to perform measurement); 2. wrong product category used (e.g. flowers in stead of fish on ice) and therefore no temperature has to be registered; 3.wrong temperature due to falsely using +/- | | | | |