

HACCP Cases

RI = Risk identification / NC = non compliance / PRP = pre-requisite program / CB = certifying body / Standard § = audit standard clause.

Year	standard §	Case	nr	Statement	CONSENSUS	Standard § sufficient?
2013	5.4 - 3.2.3.1	<p>Analysis frequency of minced meat</p> <p>A company cuts meat. According to EU regulation 2073/2005, the company has to do microbiological investigations on Salmonella spp. weekly on 5 samples. According to the analysis protocol the company conducts these investigations with a frequency of once every 2 month. The quality manager says that this frequency has been chosen because the company can't afford more investigations. This frequency is said to have been accepted by the FS authorities (NVWA), but no evidence can be given.</p>	1	<p>Major NC</p> <p>5.4 – 3.2.3.1 monitoring of microbiological parameters in the interest of food safety is not in compliance with the law.</p>	OK	OK
2013	5.4	<p>Hygiene inspection</p> <p>A company conducts, according planning, once a year internal audits and monthly hygiene inspections. During the last hygiene inspection (carried out 2 weeks prior to this audit) the quality officer observed that one of the fly screens and, at the entrance, some floor tiles are damaged. At the time of the audit, the damages were not fixed and repair has not been scheduled.</p>	2	<p>No NC</p> <p>If the auditor calculates the risk to be acceptable (is there a pest/fly problem). Otherwise NC based on relating § of 5.4</p>	OK	OK
2013	5.4 – 6.2.1	<p>Temperature of sprouts</p> <p>A trader in vegetables and fruit is certified. The products are stored, loaded and transported. Various products are collected and placed on a pallet. One of the products are fresh sprouts (the small living plants stand straight in a partially open box. The label mentions: to be stored at 2-4°C. Normally these products are stored and loaded at 8°C.</p> <p>a) According to the auditor this is an NC. The representative claims that – quoting the supplier of the sprouts – the storage</p>	3	<p>a) No NC Fresh sprouts are living plants. There are no legal requirements for plants.</p> <p>b) Major NC 5.4 - 6.2.1 The company doesn't meet the temperature requirements set for the product. (if at 7°C no NC, unless other temperatures are advised by the producer)</p>	OK	OK

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		<p>temperature is prescribed in order to minimize growth (respiration) of the sprouts. Not because of Food Safety issues</p> <p>b) The same case, but then with cut and packed sprouts.</p>				
2013	5.4-4.2.2	<p>Product change (allergens) A company is specialized in cutting and packaging of meat-products (fermented, cooked), cheese (pasteurized) and fish (salmon). The company processes the (legally to be declared) allergens mustard, gluten, soy, celery cow milk protein/lactose, fish and nuts. The product labels and specifications don't supply information on these cross-contamination allergens. The company states that sufficient measures (especially on cutting order and cleaning) are taken in order to prevent cross-contamination. During the audit it is observed that no complete cleaning, as prescribed by the procedures, is carried out when changing from product group 030 to product group 110. Product group 030 includes art. 191392 containing pistachio nuts. It was observed that during the day in between most product changes only cleaning was done with a small cloth. It was not clear to production personnel what cleaning had to be done when. There were no registrations of the cleaning activities.</p>	4	<p>Major NC The procedure for cleaning during product change, in order to prevent cross-contamination is not operational. The cleaning is not done according own procedures. The cleaning procedures are not clear/understood by the production personnel.</p>	OK	OK
2013	5.8.1 /5.12.2	<p>CCP registrations of a bulk transporting company An HACCP certified company, loads, unloads and transports products like grain, malt, sugar in bulk for both feed and food processors. According to GMP B4.1 schedule they clean their tanks, also for their food deliveries (e.g. method D cleaning and disinfection after a product with risk level LR2</p>	5	<p>Major NC 5.8.1 of 5.12.2 CCP registrations are not part of the HACCP system. There is insufficient evidence that the CCP is under control.</p>	OK	OK

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		= microbial contaminated materials). According to their HACCP analysis this is a CCP. The cleaning is outsourced to certified tank cleaning stations. After cleaning, the cleaning record, that also includes an inspection/release signature of the driver, is delivered to the client. The company does not keep these records. For verification of the procedure they yearly audit the cleaning procedure and twice a year they randomly ask their clients to show the cleaning record of a specific day/drive. Sometimes the client does not or cannot cooperate fully, and the cleaning records is not shown.				
2013	n.a	Outsourced activities Above mentioned company (A) also offers conditioned transports of fluids, like fruit juices. However company A doesn't have the means, so they outsource the process to other tank-transporters, including driver, truck and tank. Company A has set up a risk analysis of the process and an instruction for the other tank-transporters. Once a year the process is verified in an audit by company A. The auditor of the CB concludes from the registrations that the process is guaranteed. The company wants this process (conditioned transports of fluids) to be included in the scope of the certificate.	6	The transporting companies are part of a different legal entity. Outsourced activities, at those companies, are not part of the direct responsibility of the organization to be certified and, as a result, cannot be part of the scope on the certificate.	OK	OK
2013	5.4 – 3.2.1	Catering of meatballs One of the products of a catering company are meatballs. In the canteen, the cooked balls are stored frozen, thawed in the refrigerator and heated in water to a temperature above 60°C. In the low season, unlike the high season, it may occur that the meatballs remain heated for 4 hours. These balls are cooled down quickly (blast chiller with registration) and the next day the first to be heated (using the same water). No non-conformities in the temperature were registered.	7	Minor 5.4 – 3.2.1 The company doesn't meet the requirement of various Hygiene codes (Hygiëncode voor contractcatering (v.2007), Hygiëncode for care institutions (v 2008), Hygiëncode for Horeca (v.2007)) that it is not allowed to re-heat products twice. If the company has an own HACCP	OK	OK

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				system and doesn't use the Hygiene code, the process needs to be validated..		
2013	5.9.2	<p>Salmonella in minced meat</p> <p>Analysis on Salmonella of a sample, from a batch that already left the premises, indicated that the parameter exceeded the action limit. Analysis done against the legal limit at the BBD, indicated the parameter to exceed that limit as well. The company didn't start a recall procedure, because the product already had been consumed before the result of the analysis was known and on the label a preparation instruction was printed 'heat before use'. The company didn't report the case to the FS authorities (NVWA).</p>	8	<p>Major NC 5.9.2</p> <p>According to art. 7 of EU regulation 2037/2005 products that exceed the legal limits regarding pathogenic bacteria should be taken out of the market. The case has not been reported to the NVWA. Nor has it been verified, after consultation with the NVWA, whether there were products from that batch on the market (processed or frozen).</p> <p>(Note: Would it be necessary to block the products, if the re-analysis would have been good? This is not clear from the NVWA incident process. The case still had to be reported. The NVWA said they will review the incident process</p>	OK	OK
2013	5.8.2	<p>Listeria monocytogenes</p> <p>Investigation on L. monocytogenes in hard cheeses is done by testing its absence in 25 grams. The test was positive and the cheese was already supplied to the stores. The company didn't inform the authorities. Verification has been done by analysis of the parameter on BBD against the legal limit (<100/g). The result of this investigation was above the legal limit. A product recall started, however not the whole batch could be retrieved.</p>	9	<p>Major NC 5.9.2</p> <p>Products may only leave the premises if no deficiencies are found. The presence of L. monocytogenes in 25 g could have implied that the legal limits (EU regulation 2037/2005) have been exceeded. After the first investigation the product should have been blocked.</p>	OK	OK
2013	5.6	<p>A company has deleted its General Control Points, as a result of transition to the new HACCP version of the standard. This is the only</p>	10	<p>Minor NC 5.6</p> <p>The General Control Points can't be deleted, 'just like that'. Each</p>	OK	OK

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		adaptation of the Risk Analysis. Examples are: Pestcontrol, Discarding the first 6 packages of potatostarch after change from gluten containing ingredients and Purchasing Ingredients.		measure will have to be reassessed, whether they are covered by the PRP or in the Risk Analysis as a potential CCP.		