HACCP Cases

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

Year	standard §	Case	Statement	Remarks Group CONSENSUS	Standard § sufficient?
2014-1		**Verification on Legal and regulatory requirements** The organization conducts a verification of the HACCP system on a yearly basis. Upon assessment the auditor notices that regarding the conformity on applicable legal and regulatory requirements it is said that during the inspection of the Food Safety authorities (NVWA) no non-conformities were registered and that no modifications in the legal and regulatory requirements on Food Safety are foreseen.	Is this a non-conformity? HACCP § 5.1 and 5.11 describe two requirements that must be met. The company should assess if any changes occurred in the legal and regulatory requirements regarding food safety and if the company is still in compliance. Is a statement of the NVWA about no non-conformities registered sufficient to proof compliance? This is not a pro-active attitude. A company is expected to verify conformity themselves at regular planned intervals. Minor on 5.11 The statement of the NVWA is not sufficient proof that the company has assessed its conformity on the legal and regulatory requirements, unless proof is given on pro-active attitude elsewhere.	OK	OK
2014-2		**Validation of CCP** Visiting an organization, the auditor requests to see evidence of validation of the metal-detector (a CCP). The organization shows the apparatus' installation and calibration report of the supplier. From this report it can be concluded that the metal-detector has been calibrated by means of two fixed and secured programs and that the detector is able to detect products with added test cards. These are the test cards used by the company.	The calibration report is not sufficient as evidence of validation. There are no worst-case scenario's tested. Challenge tests should be performed. Minor on 5.10.3. The first evidence of a properly functioning of the metal-detector can't be given	OK Additional remark of the NVWA during the HO day: The CB is expected to make its own judgement. Both auditors are knowledgeable. In case of a disagreement contact us.	OK
2014-3		**Assessment of the Risk Analysis** Company imports and trades agricultural and horticultural products (garlic, ginger, apples, pears) from China. The Risk Analysis is described in the HACCP manual. The Risk classes are defined as Chance x Severity. The auditor has verified the RA and concluded it to be justified and acceptable for the company. The auditor was shown a visit report of the Food safety authorities (NVWA), from a few days earlier. In the report, a non-conformity on the	The auditor (CB) has its own responsibility and should rely on his own knowledge and judgment. The auditor should take into consideration the finding of the assessor of the NVWA. The company will have to evaluate and if needed act to the findings of the NVWA. The auditor will have to verify the actions.		OK

Year	standard §	Case	Statement	Remarks Group CONSENSUS	Standard § sufficient?
		RA for not sufficiently analyzing all potential risks was registered. How should the auditor act?			
2014-4		**Product specifications of a warehousing company** Company has various packed products in warehouse. The manufacturer of the products arranges the transport to and from the warehouse. The manufacturer remains the (legal) owner of the products. 1. To what extent should the company have the specifications of all products in warehouse? 2. What should the company know on the intended use of the products? 3. As above, but knowing that allergen containing products are in warehouse	1. No 2. No 3. No, but some basic knowledge regarding the risk of allergens may be expected. Important is that the product groups are clearly defined. In case of the warehousing company the product group is packed products, no risks. Storage conditions should be known at all times. No NC	OK	OK
2014-5		**Purchasing** Company buys products from various manufacturers. Involved products include RTE meals, meat products, biscuits and dairy desserts. Company demands from supplier certification under HACCP/BRC/IFS/ISO 22k/FSSC22k. 1. Are the incoming products sufficiently covered? 2. Should the company analyze incoming products? 3. What if company is a trader and what if company is a manufacturer	The RA should include aspects of raw materials, processing aids and traded products. Major on 5.5.1. Purchasing For raw materials 'infoblad 64 is valid. For traded products, produced within the EU, the 'infoblad 65 is valid, when sold under own brand	OK On March 13 2014 the NBE-HACCP accepted a proposal adjust the definition of the term trading items (clause 5.5.1 of the scheme, under item 2). The new definition is: 'Trading items: products that are sold under their own (brand)name'.	Modification under construction
2014-6		**Charters** A transport company ships perishable products, like dairy products, for manufacturing companies. Temperature monitoring during transport is a CCP. The company outsources to colleague transporters. These charters sign a supplier declaration stating 'cooled transportation'. The temperature settings are according clients' demands. Temperature data from the outsourced company are only requested in case of questions or possible	Major on 5.1.2 item 4 The outsourced activity is not included in the verification of the CCP as is required Alternative clauses Major on 5.8.1 Not sufficient monitoring or Major on 5.6 Not sufficient control of the CCP	OK	OK

Year	standard §	Case	Statement	Remarks Group CONSENSUS	Standard § sufficient?
		deviations.			
2014-7		**Product specifications** A company trades nearly all types of consumer products (bakery products, fish, meat, fruits, vegetables, herbs and spices, dairy products etc.) in total around 6.000 articles/products. The company can't proof a Risk Analysis based on the products or for the product groups they trade. The Risk Analysis they can show is based on the process of distribution and storage and they have supplier questionnaires of all suppliers with information of the suppliers and the processes and certificates. Product specifications are not available for each product. When a client asks for a specification the supplier will be contacted to send the specification which will be forwarded to the client. So in general the situation is that product specifications are not available for all products or product groups but will be fixed when somebody is asking for it.	Major on 5.5.1 and 5.2.1 The RA should include aspects of raw materials, processing aids and traded products. According to 5.2.1. a description of each product category should be available. This description should enable a verification of the safety procedures. The definition of traded product is under modification. In order to distinguish between traded products of own and foreign label. Only the first category will have to meet § 5.4.	OK On March 13 2014 the NBE-HACCP accepted a proposal to adjust the definition of the term trading items (clause 5.5.1 of the scheme, under item 2). The new definition is: 'Trading items: products that are sold under their own (brand)name'.	Modification under construction
2014-8		**CCP monitoring** 1. Of a pasteurization process, temperature is a CCP. Not the actual temperature (e.g. 75°C) is registered, but only an OK at >72 °C. 2. A transport company ships perishable and frozen products. Temperature monitoring during transport is a CCP. The temperature is being logged by means of a data-logger; however these data are not printed out and checked. The auditor has verified some data prints and concluded that also at higher day temperatures the process is under control. Several times a day on the daily registration forms it is stated 'cooling engine functions; OK'. Company doesn't want to register the actual temperature because the temperature display is on the outside of the trailer and as a result of loading/unloading the temperature fluctuates (without affecting the product).	1. Minor on 5.8.1 An OK is not the result of a measurement but a conclusion. The result is not registered 2. Major op 5.8.1 en 5.10.3 The observation that the cooling engine functions is no evidence of control of the transport temperature (CCP). Checking the data logger print outs doesn't comply to item 4 of 5.10.3 that the control measurements are such that no unsafe products are released or that the situation can be corrected immediately.	OK	OK

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2014-9		**Bacteriophages** A Dutch company produces cold smoked salmon. Product X is sprayed on the salmon according to the instructions of the supplier. Product X contains bacteriophages and has the purpose to reduce outbreaks of contamination with Listeria. According to the suppliers' website, the product is USFDA approved and can be used on cheese, meat and fish. An approval of the EU is not available at the company or on the website.	Major on 5.4 Decontamination is only allowed when a legally approved system is used. Chemicals are not to be used. The only exception is Lactic Acid that is approved for specific purposes. This product is not allowed. The EU regulations are applicable, unless the law and legal authorities of the importing country approve the product	OK	OK