

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
WASHINGTON, DC

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<b>FSIS NOTICE</b>	9-08	1/23/08
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**VERIFICATION OF THE ANNUAL REASSESSMENT AND ESTABLISHMENT  
TRAINING REQUIREMENTS UNDER THE HAZARD ANALYSIS AND CRITICAL  
CONTROL POINT (HACCP) SYSTEM**

**I. PURPOSE**

This notice instructs inspection program personnel on how to verify that an establishment has met the HACCP annual reassessment and training requirements under 9 CFR 417.4(a)(3) and 417.7, respectively. This notice cancels Food Safety and Inspection Service (FSIS) Notice 35-07 and updates the information found in that notice.

**II. BACKGROUND**

As set out in 9 CFR 417.4(a)(3), every establishment is required to reassess the adequacy of its HACCP plan at least annually and whenever any changes occur that could affect its hazard analysis or alter its HACCP plan. The establishment may reassess its HACCP plan, or plans, any time during the calendar year to meet the annual reassessment requirement.

Under 9 CFR 417.7(b), the individual who performs the annual reassessment, as well as any person who develops a HACCP plan for an establishment under 9 CFR 417.2(b) or who modifies a HACCP plan, must have completed a course of instruction in the application of the seven principles of HACCP to meat or poultry product processing, including a segment on the development of a HACCP plan for a specific product and on record review.

**III. VERIFYING TRAINING REQUIREMENTS AT THE NEXT WEEKLY MEETING**

A. If inspection program personnel determine during the performance of their duties that an establishment has implemented a new HACCP plan or hazard analysis, then he/she is to ask establishment management at the next weekly meeting after the plan is in place whether the individual who prepared the plan met the training

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**OPI:** OPPD

requirement in 9 CFR 417.7.

B. Inspection program personnel are to document the discussion from the weekly meeting with establishment management in a Memorandum of Interview and maintain the document in the government office file and provide a copy to the establishment management.

C. Whenever an establishment does not use an individual having the training required by 9 CFR 417.7 to develop, modify, or reassess its HACCP plan, inspection program personnel are to document the noncompliance (see section IV. C.3.).

**NOTE:** The establishment is not required to have documentation that the individual attended HACCP training.

#### **IV. INSPECTION PROGRAM PERSONNEL VERIFICATION OF THE ANNUAL REASSESSMENT AND TRAINING REQUIREMENT**

A. Once a year, as close as possible to the anniversary of the date that FSIS implemented HACCP (January 25-26<sup>th</sup>), inspection program personnel are to verify that the establishment has:

1. performed its annual reassessment, at some point during the prior year, by reviewing its HACCP plans to verify that they have at least been dated and signed sometime during the previous calendar year, as required by 9 CFR 417.2(d)(2)(iii); and

2. complied with the training requirement for each of its HACCP plans at reassessment, including the annual reassessment, and when it made any modifications in its HACCP plans during the preceding year. Inspection program personnel are to perform this task using Performance Based Inspection System (PBIS) procedure 03A01. Because the verification of the training requirement will coincide with the verification of the annual reassessment, a separate ISP 03A01 is not recorded just for the training component of this verification activity.

B. Inspection program personnel are to record only one 03A01 procedure on the PBIS Procedure Schedule for each PBIS HACCP processing category (for example, 03B, 03C, 03D, 03E) that covers product the establishment produces, regardless of how many HACCP plans the establishment has under that HACCP processing category, or how many HACCP Systems – Basic Compliance checklists (FSIS Form 5000-1) inspection program personnel complete.

**NOTE:** For example, if the establishment has a slaughter HACCP plan (03J), three raw ground product HACCP plans (03B), and two raw not ground product HACCP plans (03C), inspection program personnel would record a total of three unscheduled 03A01 procedures in the PBIS procedure results screen. This number represents each of the three HACCP processing categories that cover products the establishment produces, even though the establishment has six HACCP plans. If the establishment has one HACCP plan that FSIS verifies using two PBIS HACCP processing categories (03J and 03C), then inspection program personnel are to record two unscheduled 03A01 procedures in the PBIS procedure results screen.

C. Inspection program personnel are to:

1. complete, on FSIS Form 5000-1, HACCP Systems – Basic Compliance Checklist, for each HACCP plan the following applicable information:

- a. Establishment Name;
- b. Establishment No.;
- c. Process;
- d. Reassessment Date; and

e. The last block, “4. Dated Signature,” if the establishment does not perform its annual reassessment. Inspection program personnel are to check the yes column of the form if the responsible establishment official did not sign and date the HACCP plan for the annual reassessment or when modified.

2. document this activity as “A” (performed) if there is compliance. If the establishment is in compliance, file the completed FSIS Form 5000-1 in the official file; and


3. document noncompliance on a noncompliance record (NR) if the establishment has not signed and dated each of its HACCP plans during the calendar year or met the training requirement under 9 CFR 417.7 for each of its HACCP plans, using the noncompliance result code “M - Basic” and citing:

- a. 9 CFR 417.7 for not meeting the training requirement;
- b. 9 CFR 417.2(d) and 9 CFR 417.4(a)(3) for not meeting the annual reassessment requirement; or
- c. all three regulations if the establishment has not reassessed and does not meet the training requirement.

**NOTE:** If the IIC has concerns regarding the design of the HACCP plan, they are to contact the District Office for direction.

4. attach the completed FSIS Form 5000-1 to the copy of the NR and maintain a copy in the official file.

For technical questions contact the Policy Development Division at 1-800-233-3935.



Assistant Administrator  
Office of Policy and Program Development