

## **Commonly Asked Questions from Small and Very Small Plants on HACCP (1)**

### **1) What is a prerequisite program?**

Prerequisite programs are written procedures that describe particular activities of a plant that can be used to support decisions made in the hazard analysis. Prerequisite programs do not control food safety hazards. Good Manufacturing Practices (GMPs) or Sanitation SOPs are examples of prerequisite programs.

### **2) If I am the only employee, is my HACCP plan required to include a direct observation verification procedure?**

No. If there is only one production employee in the establishment, FSIS would not require the HACCP plan to include a direct observation verification procedure (e.g., of monitoring activities).

### **3) If I write monitoring results on a piece of paper before recording it on the HACCP record, should I keep the piece of paper?**

9 CFR 417.5 requires that the establishment document its monitoring of CCPs and other actual times, temperatures, and quantifiable values of its process as specified in the HACCP plan. It also requires that the establishment make each entry at the time the event occurs. The establishment is responsible for operating in a way that meets these requirements.

### **4) Are employees listed in the HACCP plan as “qualified employees” required to be trained to meet the requirements of 9 CFR 417.7?**

No, the only persons required to meet the training regulatory requirements in 9 CFR 417.7 are the persons developing the HACCP plan and conducting reassessment.

### **5) Is it a requirement that a critical control point (CCP) be located at the process step where the food safety hazard is identified?**

The location of the CCP does not have to be at the point where the hazard is identified. CCPs may be at any location that is adequate to prevent, eliminate, or reduce to an acceptable level the identified food safety hazard.