codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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PROPOSED DRAFT GUIDELINES FOR THE UTILIZATION AND PROMOTION OF QUALITY ASSURANCE SYSTEMS

Governments and international organizations wishing to submit comments on the following subject matter are invited to do so **no later than 15 January 2000** to: Digby Gascoine, Director, Policy and International Division, Australian Quarantine and Inspection Service, GPO Box 858, Canberra ACT, 2601 (telefax: 61 2 6272 3103), or by email to the Codex Contact Point at codex.contact@affa.gov.au with a copy to the Chief, Joint FAO/WHO Food Standards Programme, FAO, Via delle Terme di Caracalla, 00100 Rome, Italy.

BACKGROUND

1. The 6th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) agreed to keep the consideration of the development of guidelines for the utilization and promotion of quality assurance systems on its agenda. Accordingly, it was decided that a further discussion paper would be prepared for consideration at the 7th Session of the CCFICS.[1]

2. The 7th Session of the CCFICS agreed[2] to request the Commission to approve the elaboration of the Guidelines as new work. The 23rd Session of the Codex Alimentarius Commission noted[3] the general support for the elaboration of the Guidelines and agreed for a substantive working paper to be presented at the next CCFICS session.

RATIONALE FOR DEVELOPMENT OF GUIDELINES

Terms of Reference

3. The terms of reference of CCFICS include: "to develop guidelines for the utilization, as and when appropriate, of quality assurance systems to ensure that foodstuffs conform with requirements and to promote the recognition of these systems in facilitating trade in food products under bilateral/multilateral arrangements by countries".[4]

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1 ALINORM 99/30, paras. 59-61.
2 ALINORM 99/30A, paras. 85-93.
3 ALINORM 99/37, para. 205 and Appendix VIII.
4 Codex Alimentarius Commission Procedural Manual, tenth edition, pages 94-95.

4. The *Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems*[5] state that the voluntary utilization of quality assurance by food businesses should be encouraged, and that if safety and/or quality assurance tools are used by food businesses, the official inspection and certification systems should take them into account, in particular through the adaptation of their control methodologies. The guidelines note that governments do retain the fundamental responsibility to ensure, through official inspection and certification, the conformity of foodstuffs to requirements; although the degree to which industry utilises quality assurance procedures can influence the methods and procedures by which government services verify that requirements have been met.

Interpretations of Quality Assurance Systems

5. Many food operations are adopting quality systems for commercial reasons. At the same time, some governments are requiring implementation of HACCP based systems in food production to address food safety issues. The many approaches adopted across the world have been developed without international guidelines and as a result there has been a proliferation of model systems developed. Some are aimed at particular sectors of industry. HACCP is widely mentioned and recommended (or mandated) for controlling food safety attributes. Some models recommend utilising HACCP methodology for attributes beyond food safety. Some link HACCP to quality systems, while others emphasise that the HACCP based system is not intended to be associated with quality systems.

6. CCFICS has been given the mandate, under its terms of reference, to address the issue and prepare draft guideline for implementation of QA systems that incorporate a risk based approach (such as HACCP) for dealing with potential food safety hazards.

Existing International Quality Systems and Food Safety Links

7. The ISO 9000 standards are designed to cover general business management systems. They do not specifically address management of food safety. A food company may successfully apply for and gain ISO certification as complying with standard 9001 or 9002, even though its system may not address food safety issues. This is particularly so if food safety standards are not legal or customer requirements. This topic remains controversial and experts in the field hold very different views.

8. The difficulty of applying the ISO 9000 quality management standards directly to the application of risk based food safety systems such as HACCP has been acknowledged by at least one national standards body. To address the problem, detailed guidance is now available[6].

9. Existing certification bodies are accredited by International Accreditation Forum[7] members to certify ISO standards, but not necessarily other quality systems that address food safety. This has been acknowledged by some IAF members (Australia and Netherlands) who have developed national procedures to separately accredit certification bodies engaged in assessment and certification of HACCP based food safety systems that are not part of ISO 9000 systems. Such an approach recognizes that there are many instances where a full ISO 9000 quality management system is not appropriate to food businesses, but a risk based food safety system, such as HACCP is applicable and desirable. It also illustrates that there is a growing demand for HACCP based systems to be used a certification/registration standard, without any requirement to link to ISO 9000 standards.

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5 CAC/GL 26-1997, Section 4.

6 Australian/New Zealand Standard AS/NZS 3905.13:1998

7 The International Accreditation Forum (IAF) is an association of accreditation bodies that accredit certification/registration bodies as complying with the relevant international guidance documents relating to competence, impartiality and integrity of process. Under the auspices of ISO the IAF is developing a multilateral mutual recognition agreement that will lead to acceptance of the concept of "one audit, accepted globally" for certifications/registrations to the ISO 9000 series. Thirty-five countries are currently participating in the IAF.

Parallel ISO Work

10. The ISO committee TC 34 is currently engaged in preparation of a guideline for food businesses operating ISO 9000 system, linking the food safety aspects to HACCP. The guide, when (and if) finalised, will be limited to only assisting those food businesses that operate ISO 9000 quality management systems. There are relatively few food businesses that operate ISO 9000 systems.

ROLE OF QA SYSTEMS IN FOOD SAFETY

11. There are clear benefits of implementing QA systems for all of the major stakeholders: consumer the food industry and government. Quality systems have long been employed by food businesses to:

- improve quality and product consistency
- reduce costs of production and wastage
- meet customer demands
- increase consumer and/or government confidence;
- increase market access;
- improve staff and management commitment to quality including food safety; and
- decreased business risk (such as legal and insurance costs).

12. Regulatory authorities are aware of increasing societal pressures to assure the highest levels of food safety. At the same time, regulators recognise the need for both an affordable and safe food supply and that food inspection and certification systems must be both effective and efficient in their operation. These pressures have seen increasing emphasis given to the creation of quality systems that are amenable to audit at intervals and allow less than a full-time, and therefore less costly, official regulatory presence. The challenge for regulators is to devise systems that ensure hazards to food safety inherent in a particular food production operation are identified, are actively controlled and can demonstrate that potential hazards remain under control. The benefits to regulatory authorities can be summarised as

- improved public health;
- more efficient and targeted food control;
- reduced public health costs;
- trade facilitation; and
- increased confidence of the community in the food supply

13. Companies that can effectively respond to these food safety regulatory challenges through the adoption of appropriate quality systems can rightly expect a diminished level of regulatory intervention, commensurate with their demonstrated level of performance. This can result in direct cost savings to industry parties especially under official food inspection and certification systems that operate on a cost recovery basis. However, the general production efficiency savings inherent to effectively operating quality systems offer significant industry cost savings, including under circumstances where regulatory services are not charged to industry.

AIM OF THE GUIDE

14. Against the background of expanding adoption of quality systems, including systems which incorporate HACCP for food moving in international trade, it is evident that official food inspection and certification systems need to be sufficiently flexible to accommodate the many approaches adopted. CCFICS has previously stated[8] that the introduction or use of such a system was voluntary but could, as required, be taken into account by competent authorities.

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[8] ALINORM 97/30A, para 85.

15. In order to assist the work of competent authorities in respect of quality systems and to facilitate international trade, this working paper has been prepared in the form of a draft guideline, which details:

- the elements that a QA system should include and their interrelationship with HACCP
- the elements that should be in place for official assessment of QA systems
- implementation of QA systems
- recognition of QA systems in trade.

16. The document does not seek to identify a particular QA system as being suitable for application in the food industry. The draft guidelines that follow, primarily seek to define the elements of a QA system that facilitate official assessment processes which may be adopted within food inspection and certification systems.

17. The draft guideline has been prepared by Australia in cooperation with Canada, Denmark, France, India, New Zealand, South Africa and the USA.

RECOMMENDATION

18. It is recommended that the Committee review the attached draft guideline and consider appropriate amendments.

Annex

PROPOSED DRAFT GUIDELINES FOR THE UTILIZATION AND PROMOTION OF QUALITY ASSURANCE SYSTEMS FOR FOOD SAFETY

At Step 3

SECTION 1 - SCOPE

1. This document outlines how certified QA systems could be utilized by food import and export inspection and certification systems to help assure food safety and to facilitate trade.

2. This document elaborates elements of CAC/GL 26 1997, "Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems", particularly Section 4. The document recognizes that HACCP principles[1] can be successfully integrated into a broader quality assurance system that includes food safety and other requirements.

3. The document does not mandate the use of QA systems nor does it promote the use of any particular system. Countries are encouraged, however, to have businesses develop and use quality assurance systems as a mechanism for helping to assure food safety and for meeting other requirements applicable to food in trade.

4. QA systems may address commercial elements not of regulatory interest and these guidelines are intended to allow these commercial aspects to operate concurrently.

SECTION 2 - DEFINITIONS[2]

*Audit*** is a systematic and functionally independent examination to determine whether activities and related results comply with planned objectives.

*Certification*** is the procedure by which official certification bodies and officially recognized bodies provide written or equivalent assurance that foods or food control systems conform to requirements. Certification of food may be, as appropriate, based on a range of inspection activities which may include continuous on-line inspection, auditing of quality assurance systems, and examination of finished products.

*Equivalence*** is the capability of different inspection and certification systems to meet the same objectives.

*Inspection*** is the examination of food or systems for control of food, raw materials, processing and distribution, including in-process and finished product testing, in order to verify that they conform to requirements.

*Official accreditation*** is the procedure by which a government agency having jurisdiction formally recognizes the competence of an inspection and/or certification body to provide inspection and certification services.

*Official inspection systems and official certification systems*** are systems administered by a government agency having jurisdiction empowered to perform a regulatory or enforcement function or both

*Officially recognized inspection systems and officially recognized certification systems*** are systems which have been formally approved or recognized by a government agency having jurisdiction.

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1 Hazard Analysis and Critical Control Point System and Guidelines for its Application, Annex to the Recommended International Code of Practice – General Principles of Food Hygiene (CAC/RCP 1 1969, Rev. 3-1997).

2 Definitions drawn from the Guidelines for the Design, Operation , Assessment and Accreditation of Food Import and Export Inspection and Certification Systems (CAC/GL 26 1997) are marked with **.

Quality assurance All those planned and systematic actions necessary to provide adequate confidence that a product or service will satisfy given requirements for quality (ISO 8402 Quality management and quality assurance - Vocabulary)

Quality system Organisational structure procedures, processes and resources needed to implement quality management (ISO 8402)

*Requirements*** are the criteria set down by the competent authorities relating to trade in foodstuffs covering the protection of public health, the protection of consumers and conditions of fair trading.

*Risk analysis*** is a process consisting of three components: risk assessment, risk management and risk communication.

*Risk assessment*** is a scientifically based process consisting of the following steps: (i) hazard identification, (ii) hazard characterization, (iii) exposure assessment and (iv) risk characterization.

*Risk management*** is the process of weighing policy alternatives in the light of the results of risk assessment and, if required, selecting and implementing appropriate control options, including regulatory measures.

SECTION 3 - ELEMENTS OF QA SYSTEM

5. The QA system should be documented in an appropriate manner and include at least the elements listed below. The manner in which the elements are documented should be adapted to suit the particular business, rather than follow a prescriptive format.

- Purpose and scope;
- Defined management structure with stipulated responsibilities;
- Product description and intended use;
- Established quality objectives for each product covered by the system;
- Process description;
- Identification and analysis of risk factors
- Control measures for minimising or eliminating risks;
- Recall procedures;
- Documentation and record keeping requirements;
- Training policy.

6. In general, the elements of a QA system should be the same, whether the system is implemented with the intent of addressing official requirements or commercial conditions.

7. Businesses should recognise that HACCP principles can be successfully integrated within these elements. Appendix 1 shows the relationship of HACCP principles to the quality system elements detailed here.

Purpose and Scope

8. Businesses should document precisely what the QA system is to cover, ie what products and processes, operations and outputs are involved, what premises and locations are included, and the issues that the system aims to control eg food safety and/or, other quality attributes. While the business may include a range of quality objectives for its QA system, elements that address regulatory requirements should be specifically identified when documenting the system.

Defined Management Structure with Stipulated Responsibilities

9. For a QA system to operate effectively, it is critical that the business has a management structure that can support and take ultimate responsibility for the system. The QA system documentation should describe who has quality responsibilities and authority in relation to the system's management. Specific requirements for the communication and demonstration of commitment to the QA system should be outlined.

10. For a QA system to remain effective, management should include regular reviews, to verify that the purpose and policy objectives of the system remain relevant and are being achieved.

Product Description and Intended Use

11. A description of each product and its intended use is necessary for determining desired outcomes of the quality system, particularly in relation to food safety. This should be extended to include quality aspects beyond food safety, if these aspects are included in the scope of the QA system. Factors that should be described include:

- characteristics of the product being manufactured that will impact on the safety of the final product, or subsequent steps on the food chain, such as treatments that will reduce or arrest microbial growth, packaging and storage conditions, product composition, including A_w and pH and attributes that inhibit the growth of pathogenic bacteria.
- inputs or ingredients added to the product
- how and where the product will be used or prepared for use, for example whether the product is for further processing, is consumer ready or will be cooked prior to serving. Vulnerable consumer groups should also be identified
- packaging material in respect of its role in product quality
- necessary labelling where there are special instructions required for storage or preparation (eg, "KEEP FROZEN").

Established Quality Objectives for each Product Covered by the System

12. Some of the factors that should be considered when determining objectives include:

- food safety and legislative requirements;
- customer requirements; and
- other quality attributes.

Process Description

13. A description of each process is essential to development of a QA system for food production. A process flow diagram is a useful means to document details.

Identification and Analysis of Risk Factors

14. Identification and analysis of risk factors are essential to a QA system and are particularly important in the application of food safety management. The range of risk factors covered will be determined by the scope of the QA system and may include issues other than food safety. The Codex HACCP Guideline[1] provides useful methodology for identification and analysis of risk factors.

Control Measures for Minimizing or Eliminating Risks

15. Process controls that relate to food safety outcomes should be managed through the application of good practices programs such as good agricultural, hygienic, manufacturing practice as well as the application of HACCP principles[1]. Where a formal risk based approach to food safety (other than HACCP) is used, it should include systems and methodologies that have been recognised and endorsed by Codex.

16. Process control should cover the entire production flow including raw materials, each production step, inspection and testing of raw material, part finished or in-process product, and final product, as appropriate. Other activities affecting quality should also have process controls documented.

17. The operating procedures to be followed at each process step should be specified and included in process control documentation.

18. The identification of problems that may compromise food safety or other quality attributes and the timely implementation of corrective action to rectify and prevent re-occurrence of the problems, are essential elements of a QA system. The system should be able to identify in process product or final product that does not meet specified quality. Corrective action procedures should be established to ensure that when deviations occur, process control is restored as soon as possible, affected product is dealt with appropriately, and measures to prevent recurrence of the deviation are implemented.

Recall Procedures

19. Internal and external recall procedures should be considered within the QA system to deal with non-conforming product. The system should include procedures to enable efficient and rapid recall or appropriate actions to deal with in process and final product that fails to meet specification. This should include recall if the product has been distributed to external customers.

Documentation and Record Keeping Requirements

20. Documentation of the QA system is essential

- for objective auditing (internal and external)
- to provide evidence that due care has been taken during processing.

21. The extent and detail of the documentation will depend on the purpose of the system. Applicable legislation may specify the nature and extent of documentation required if the system includes elements of regulatory interest.

22. Some examples of documents and records are:

- specifications for purchasing raw materials, services or other supplies;
- specifications of final product;
- training and qualification records;
- operating procedures;
- internal reviews;
- process control records
- results of inspection and testing;
- procedures to identify and trace final product including nonconforming product
- corrective action records.

Training Policy

23. The QA system should specify the nature of formal training and experience required for personnel engaged in any food safety and or regulatory compliance aspect of the control program. Training and qualification needs should be identified for each aspect of the system. In some circumstances there may be legislative requirements that demand minimum training and qualifications for operators of some machinery, such as pasteurisers and retorts.

SECTION 4 - IMPLEMENTATION AND MAINTENANCE OF QUALITY SYSTEM

Implementation

24. The development and implementation of a QA system with a HACCP component should recognise that there exists a critical interdependency between HACCP and prerequisite programs. Prior to implementing HACCP, businesses should be operating good practice programs, such as good hygienic practice.

25. Where HACCP is used as the mechanism for ensuring food safety, the implementation of a QA system should consider where the principles of HACCP and the elements of a QA system correlate. Appendix 1 shows this relationship.

26. The implementation of a QA system can be phased in. For example, developing some controls over raw materials, by stipulating specifications, implementing controls and checks to verify that specifications are met, and a training program for personnel involved in the process. This should logically lead the QA development process forward, to cover processing; manufacturing, storage and transport steps. An alternative initial step could be developing a recall system. This should lead to developing corrective action and controls "backwards" to raw material controls. Phased implementation should not preclude implementation of a QA system proceeding at several discrete points in the production system.

27. A "horizontal" approach to gradual development of a QA system could involve developing and documenting responsibilities and training needs for personnel involved in the system.

Maintenance

28. Once the QA system is established with the essential elements described above in place, then the system should be validated as being able to achieve the desired objectives set to meet regulatory, customer and internal requirements, covering food safety, quality and other issues.

29. A QA system is never considered complete. Change is a normal part of food production and distribution and a QA system must be able to deal with constant modification. The system may need to be amended for various reasons including:

- new product lines or raw material/ingredient sources
- changes to processing or product formulation
- adopting new technology, such as automated machinery
- changes to legislation or customer requirements
- findings of internal audits and management review
- new threats to food safety.

30. Whenever changes are implemented, the effect on other parts of the process or QA system should be considered. The altered system should be re-validated as being able to achieve the objectives set to meet regulatory, customer and internal requirements, covering food safety quality and other issues. Documentation should be updated and circulated to relevant personnel and any training needs that are identified should be provided.

SECTION 5 - ELEMENTS OF AN OFFICIAL ASSESSMENT SYSTEM

31. An official assessment system designed to assess the compliance outcomes of a QA system should be capable of verifying that the control programs are in place and are operating to the prescribed standard and are effective in meeting regulatory outcomes.

32. The confidence delivered by any quality system depends on adequate rigour in external assessment, as well as on the comprehensiveness and appropriateness of the system implemented by the particular business.

33. Governments can directly assess QA systems or officially recognise other parties to carry out assessment activities such as independent assessment bodies, certification and accreditation bodies, where appropriate. Where official recognition is granted to third parties, Governments should ensure that the third party is suitably accredited according to accepted Government criteria and made subject to official verification measures[3]. In these cases the responsible controlling authority should implement a system for assessing the capability of these third parties.

34. The system, regardless of whether operated directly by government or an officially recognised third party body should incorporate[4]:

- provision of adequate resources to operate the system, including appropriately trained and competent personnel
- legislative authority for granting, maintaining, varying, suspending and withdrawing official recognition.
- documented specifications/ requirements for the granting of official recognition of QA systems
- powers for appointing (and withdrawing appointment) of auditors
- a documented management system covering the entire auditing process
- a sanctions policy and procedures for dealing with businesses that fail to meet requirements of the system
- a communication strategy to inform trading partners, industry and consumers about the system.

Assessment system

35. Whether assessment is for regulatory or other purposes, the audit approach should involve:

- an initial assessment of the documented QA system (including documented prerequisite programs)
- an initial audit covering the entire QA system as implemented
- a stipulated audit frequency which should take into account the risk classification of product type and seasonal factors
- a policy for variation of audit frequency related to the business compliance
- specification of action, including sanctions that may be applied where non-conformities exist
- withdrawal of certification if the system fails to meet requirements
- appeal process for the resolution of complaints and disputes.

Documented Requirements

36. Official requirements for QA systems should be documented and available for those who seek certification under the system.

37. The information should cover

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3 ISO/IEC 61:1996 *General requirements for assessment and accreditation of certification/registration bodies* provides criteria for bodies operating accreditation systems for recognition at national or international level.

4 ISO/IEC Guide 62:1996 *General requirements for bodies operating assessment and certification/registration of quality systems* provides criteria that should be met for recognition as a competent, reliable certification/registration body.

- the process for gaining certification, including the criteria against which the QA system will be assessed
- limitations in the scope of the certification provided
- complaints / appeals
- any fees that apply
- rights and responsibilities of applicants
- sanctions that apply in the event of failure to meet terms of the QA system.

38. The official or officially recognised certification body, may choose to publish guidance information about how businesses can develop a QA food safety system that will meet stipulated requirements. In order that the impartiality and independence of official assessment of QA systems is not compromised by providing advisory services as well as auditing the systems set up in response to advice, the certification body must ensure careful and transparent separation of functions.

Reporting/Record Keeping

39. The assessment of QA systems should accurately record what action has been taken, or sanctions applied in respect of certification procedures. Reporting should follow a stipulated format.

40. Records should be maintained with due regard for confidentiality.

41. Any legal requirements for keeping reports and other records in respect of time and maintaining confidentiality / privacy should be incorporated within the system.

Audit Personnel and Qualifications

42. Where assessment of QA systems is undertaken for official certification purposes, a formal system for auditor registration or certification should be used. It should cover assessment for competency measured against the prospective auditor's knowledge in technical matters such as :

- the particular industry or processes
- HACCP
- the relevant legislation, guidelines or industry guides
- food microbiology and chemistry, etc.

43. The competence and qualification of prospective auditors in skills distinct from food safety, such as auditing methodology should also be considered in the auditor approval process.

44. The formal training and experience of personnel in auditing, food safety, technology and other appropriate issues should be relevant to auditor status and task, and a classification ranking auditors implemented. Classification may include lead (or senior) food safety auditor, food safety auditor and associate food safety auditor.

45. An evaluation of personal attributes such as the ability to communicate orally and in writing; objectivity and analytical skills should to be included in the assessment of auditors.

46. Procedures should take into consideration that experts in the particular industry, although possibly lacking audit experience and skills, may be a valuable addition to audit teams. Procedures should allow such people to be incorporated into audit teams.

47. Along with an application and assessment process, the official system should include criteria for continuation of auditor status, including maintenance of skill levels. Factors which should be considered part of maintaining or changing auditor status include:

- continuing auditor experience; and

- professional development and continuing education, such as formal courses
- peer review findings.

Audit Management

48. Management of an assessment system for a QA food safety program needs to be carefully set up to ensure procedures are followed and defined objectives can be consistently met, regardless of personnel changes. Management procedures need to be developed and continually updated to cover:

- audit programming and scheduling (this may take into account the "risk' of the particular food products and performance of businesses under audit);
- audit reporting (including format, recipients and maximum time for reporting);
- follow-up of corrective action issued and or sanctions that were applied at audit; and
- confidentiality issues.

SECTION 6 – BENEFITS OF RECOGNISED QA SYSTEMS

49. The recognition of QA systems by either official bodies or commercial parties operates to facilitate trade by providing verifiable means of assessing that official requirements or commercial conditions are being consistently met.

Recognition of QA Systems in Trade

50. CAC/GL 26 1997 (Section 4) notes that *"If safety and/or quality tools are used by food businesses, the official inspection and certification system should take them into account in particular through the adaptation of their control methodologies."*

51. Official recognition of QA systems can impact on official inspection input through adopting a performance based system of audits. Under a performance-based system, businesses that consistently comply are audited less frequently.

52. The potential benefits of official recognition of QA systems apply equally to trade in food within and between countries. International trade in food can be facilitated by parties entering into equivalence agreements that provide recognition of QA systems.

APPENDIX 1

RELATIONSHIP OF HACCP PRINCIPLES TO ELEMENTS OF QA SYSTEM

This table shows which element of a QA system described in this document correlates to the Codex HACCP principles.

HACCP PRINCIPLE	EXPRESSED IN QA SYSTEM ELEMENT
No.1 Identify the potential hazard(s) associated with food production at all stages from growth, processing, manufacture and distribution, until the point of consumption. Assess the likelihood of occurrence of the hazard(s) and identify the preventative measures for their control.	Purpose and scope Product description Process description Identification and analysis of risk factors Control measures for minimising or eliminating risks. Training
No. 2 Determine the point/procedure/operational steps that can be controlled to eliminate the hazard(s) or minimise its likelihood of occurrence _(Critical Control Points (CCP). A step means any stage in food production and/or manufacture including raw materials, their receipt and or production harvesting transport formulation processing storage etc.	Identification and analysis of risk factors Training
No. 3 Establish critical limits which must be met to ensure CCP is under control	Establish objectives for each product Identification and analysis of risk factors Training
No. 4 Establish a system to monitor control of the CCP by scheduled testing or observations.	Identification and analysis of risk factors Control measures for minimising or eliminating risks Training
No. 5 Establish the corrective action to be taken when monitoring indicated that a particular CCP is not under control	Control measures for minimising or eliminating risks Recall procedures Training
No. 6 Establish procedures for verification which include supplementary tests and procedures to confirm that HACCP system is working effectively	Control measures for minimising or eliminating risks Training
No. 7 Establish documentation concerning all procedures and records appropriate to these principles and their application.	Documentation and record keeping Training