

#5. SPECIFYING THE HACCP-TQM POLICIES, PROCEDURES, AND STANDARDS FOR SELF-CONTROL

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In this article, I will cover what you need to include in your general HACCP-TQM policies, procedures, and standards, also called GMPs.

First of all, let's review. This series of articles shows you how to implement a food safety self-control program. I covered in a previous article that there are twelve sections to the self-control manual.

1. Food safety policy and procedures
2. Organization for HACCP-based TQM
3. System description
4. Reserved for special uses (e.g., GMPs)
5. Supplier HACCP
6. Recipe HACCP
7. Cleaning and sanitizing schedule and instructions
8. Maintenance schedule and instructions
9. Pest control schedule and instructions
10. HACCP-TQM employee training program and record
11. Self-inspection, continuous quality improvement
12. Food safety program verification and certification

I have written HACCP-TQM programs for USDA and FDA wholesale and retail operations. The above is a universal list of elements necessary for a complete HACCP-TQM policies, procedures, and standards manual for any of the agencies.

We have discussed what belongs in Sections 1 through 3. This article discusses GMPs and Section 5. What is the purpose of the GMPs? There are many rules that stand alone and must be followed by all people in a facility. The GMPs are made up of the general operating rules that people must know and follow in operation to assure safety. A good list of rules to use as a starting point is 21 CFR Part 110. These are for processing plants, and the ones that follow are mostly additions needed for retail operations. The GMPs in this model HACCP program are added to each section as appropriate. Alternatively, they can be brought together in Section 4.

The topics that should be included in the GMPs are as follows.

- A. Management
- B. Personnel
- C. Environment
- D. Facilities
- E. Equipment
- F. Supplies and Materials
- G. Food Production
- H. Consumer

Management. The Management section includes topics such as the rules for the Person In Charge (P.I.C.), smoking areas, where the license is displayed, truth-in-menu practices, how hazard analysis will be conducted, how manager communications will be carried out, how to deal with emergencies such as power outages, and how program enforcement will be handled.

Personnel. The Personnel section includes employee responsibilities (e.g., reporting illness to management), the use of gloves, and personal hygiene and cleanliness (e.g., fingernails, fingertip washing, chewing gum, etc.).

Environment. The purpose of the Environment section is to describe how the area around the facility will be kept hazard free. It also provides rules for monitoring the water from the water company, sewage disposal, pest control, poisonous materials, etc.

Facilities. The Facilities section deals with keeping the facility building in safe operating condition. This includes some rules for facility design, lighting, plumbing, utility sinks, ventilation, garbage, restrooms, laundry facilities, etc.

Equipment. The Equipment section provides the construction requirements for equipment, where operating instructions are to be found, use of sanitizers, operation of freezers and refrigerators, warewashing equipment, when detergent solutions will be changed, how to measure solution strengths, brooms, washing, storage of dishware, etc.

Supplies and Materials. The Supplies and Materials section deals specifically with the supplier. It provides rules for purchasing, supplier certification, ingredient specifications, and the control of first aid materials.

Food Production. The Food Production section, which includes service, is the most important section in terms of HACCP. It provides the general production policies on handling food, such as the rules for milk use, receiving food, labeling food, use-by dates, recommended times to cool food, etc.

From storage, the food is subject to pre-preparation rules such as thawing, food handling, separating raw from cooked food, and washing food.

This section then covers preparation, which entails removing hard foreign objects from food; food pasteurization methodology; safe preparation of thick foods, thin foods, sauces, batters, fruits and vegetables, breads, etc. It includes the rules for adding acid to food and determining the water activity of food. It discusses blanching, reconditioning of food, frozen desserts, etc.

Following preparation is the holding, serving, and transporting of food. This part of the Food Production section deals with how the food is to be held, the maintenance of conveyors, keeping the salad bar sanitary, handling dishware and money, food tasting, and the rules for carry-out and banquet food.

Next, this section discusses storing prepared food. It provides the general rules for cooling, dating for storage time, storage containers, dealing with leftovers, beverage condensers, dispensing tableware and flatware, table condiments, ice scoops, etc.

Consumer. The Consumer section discusses consumer handling of the food. It provides the rules for consumer information on what is and what is not hazardous food, returned food, what to do about food sabotage, and slicing food for customers.

Supplier HACCP

Section 5 of the policies, procedures, and standards manual, Supplier HACCP, deals with validating the HACCP programs of a supplier. The retail food code requires that the food operator purchase from government-inspected sources of supply. Actually, government-inspected, raw food is well recognized as being highly contaminated (e.g., raw meat, fish, and poultry; raw fruits and vegetables). Therefore, the HACCP operator buys from suppliers that can provide HACCP back-up.

The three major components of this section are: 1) supplier HACCP qualification standards, 2) a list of all ingredients being purchased, and 3) ingredient specifications, which can be provided by the supplier of each HACCP'd item.

As a help in getting supplier certification, the following is a model letter that the author has developed for retail food operators to send to their suppliers to ask for fundamental HACCP information.

SAMPLE LETTER:

Vendor _____ Date _____
Address _____

Since you are one of our current/potential vendors, we would like to know about your quality assurance program. If you have a HACCP program, we consider this to be part of your QA program. It is very costly for us to receive a product or service from a vendor that does not meet our expectations. Please answer the following questions and provide the material as appropriate concerning your quality assurance plan and program to achieve each requirement. When we visit with you, we will expect that you be able to demonstrate that you do each item effectively and are continually improving.

1. Who developed your HACCP/Quality Assurance program?
Who validated your program as effective?
Who are the members of your HACCP/QA team?
How often do they meet?
Describe your preship verification program.
2. Have you taught each employee who works with food the hazards associated with the task he/she performs and how to perform the necessary controls?
3. What do you require of your suppliers in terms of ingredient HACCP controls?
4. Please tell us about your recall and emergency action program.
5. Describe the responsibilities of your Quality Assurance/Quality Control department.
What ingredient testing do you do?
What product testing do you do?
6. What are the critical limits, if you have them, for the biological, chemical, and physical hazards that are reasonably likely to be in the products you provide to use?

In addition to the above, would you please provide specifications to us for the products we purchase from you?

We will appreciate your prompt response.

Sincerely,

The second component of Section 5 is the ingredient index. The actual ingredient specification sheets are in the third part of Section 5. A typical ingredient sheet includes the following information.

INGREDIENT SPECIFICATIONS

Name:

Date:

Index/number:

Brand:

General:

Size:

Case:

Acceptable Ingredient Characteristics

Size:

Color:

Count:

Hazards levels / size

Unacceptable Ingredient Characteristics

Size:

Color:

Count:

Hazards levels / size

Notes

Summary

In this article, I have laid out the basic components of the GMPs for retail food operations and how one can ask for supplier certification.

In retail operations, it should be possible to use the local government food code for operating rules. This is not possible, however, because the government writes its regulations for the inspector to use, not for the operator to use.

The philosophy of safe food is that the cook is the critical control point. Therefore, the cook--and the cleaning staff--must receive correct procedures to follow in order to assure safety. These procedures are not found in government publications, but rather in training materials from the better training companies.

The GMPs are designed so that owners can take the initiative to rewrite government rules into working rules for all employees to follow in their operations. This becomes the basis for those operators' self-control programs.

When the government audits a facility with self-control, the inspector looks for the twelve sections of the policy manual, each section having a different in controlling the operation. If all sections of the policy manual are being followed, that facility has self-control and should not

need to be inspected again, as long as that manager--who knows how to achieve self-control--is present.

The recipes and menu of an operation need to be considered as well, but they are not a prerequisite program. They will be discussed in the next article.

Reference:

Code of Federal Regulations (CFR). 1995. Title 21. Food and Drugs. Parts 100 to 169.
Superintendent of Documents. U.S. Govt. Printing Office. Washington, D.C.