Procedure for Verification and Validation

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Procedure for Verification and Validation

Purpose:

To establish a procedure to define the validation and verification of food safety management system.

Scope :

This applies as follows:

PRPs - Verification

Hazard control Plan (CCPS/ OPRPs)

CCP/OPRP - Validation prior to application

Food safety system - Validation & verification

Responsibility:

Food safety Team & External experts (if required)

Procedure:

Validation:

Validation is defined as "Obtaining evidence that the elements of the HACCP control plan are effective." Validation essentially is the part of HACCP control plan verification that asks the question *"Am I doing the right thing?"*

Validation involves a scientific and technical review of the rationale behind each part of the HACCP control plan from hazard analysis through each CCP/OPRPs verification strategy. This is conducted by the Food safety team, with assistance by additional experts as necessary.

Initial Validation Initial validation is conducted within the first weeks or months of implementation of the hazard control plan. During initial validation, the team should aim to achieve the following:

- assure that the plan is valid for controlling food safety hazards associated with the ingredients, process, and product, and
- verify that the plan can be implemented as written.

Hazard control plan validation includes:

- a review of the hazard analysis,
- OPRP/ CCP determination,
- justification for critical limits, based for example on current good science and regulatory requirements, and
- determination of whether monitoring activities, corrective actions, record keeping procedures and verification activities are appropriate and adequate.
- If deficiencies are noted in any of these areas, the Food safety team must revise the Hazard control plan. These changes must be implemented as rapidly as is practicable

Revalidation

Revalidation, or reassessment, of the Food safety system is done on:

- after any changes are made that could affect the hazard analysis or the hazard control plan,
- when any changes are made to the FSM system, and
- when specifically required by regulatory authorities or private standards bodies
- new information arises concerning the safety of a product or ingredient,
- the product or product category is linked to a foodborne disease outbreak,
- multiple deviations from a Critical Limit occur,
- inadequate record-keeping is followed,
- recalls or product withdrawals occur, or
- Customer complaints occur.

Verification

verification procedures is to confirm that the FSM system is being implemented according to the written plan.
This is the part of hazard control plan, verification that asks the question *"Am I actually doing what I say I should be doing?"*

Hazard control plan verification activities are designed to ensure that the hazard control plan is being implemented properly. This includes:

- Verification of prerequisite programs
- Verification of OPRPs/ CCPs

Verification activities are carried out by individuals within the company, third party experts, and regulatory agencies. It is ensured that individuals conducting verification activities have appropriate technical expertise to perform this function.

Verification of Prerequisite Programs:

Verification of general prerequisite programs such as issues relating to the premises will include a periodic review of written procedures to ensure the programs are operating as planned. Elements of prerequisite programs that are incorporated into the hazard control plan (e.g. calibration of monitoring devices) will be included as a verification procedure.

Verification of Hazard control plans (CCPs/ OPRPs):

Primary verification activities for OPRPs/CCPs include:

calibration of processing and monitoring instruments, review of calibration records, review of monitoring records and corrective action reports, independent check on the adequacy of the CCP to control the identified hazard, if possible, and targeted sampling and testing.

Verification of the Hazard control Plan:

Verification of the hazard control plan will focus on ensuring that the implementation of the plan complies with the written hazard control plan. The goal at this stage is to check for compliance with the written HACCP plan/OPRP plan, not its validity (the latter is conducted during hazard control plan validation).

Hazard control plan verification activities include an on-site audit and review of CCP/OPRP records. This verification should focus on confirming that:

- the product description and flow diagram are accurate,
- Critical control points (CCPS)/Action criteria (OPRP) are monitored as required by the plan,
- processes are operating within established critical limits/ action criteria
- records are completed accurately, at the time intervals required, and reviewed appropriately,
- consumer complaints are reviewed and appropriate action taken,
- monitoring activities have been performed at the locations specified in the hazard control plan,
- monitoring activities have been performed at the frequencies specified in the hazard control plan,
- corrective actions have been performed whenever monitoring indicated deviation from critical limits, and
- equipment has been calibrated at the frequencies specified in the hazard control plan.

External Verification

External verification may be conducted by a regulatory authority, your customers, private consultants, or certification bodies. Verification procedures by a regulatory agency or external auditing body may include:

- review of the hazard analysis, the hazard control plan, and any modifications,

- review of CCP/OPRP monitoring records,
- review of corrective action records,
- review of the verification records,

- visual inspection of operations to determine if the hazard control plan is followed and records are properly maintained, and
- random sample collection and analysis.

Auditing procedures at CCPs/OPRP in the process are particularly important and should include:

- confirming the nature of the operation,
- confirming the operator's knowledge of the CCP, the CL(s),action criteria and the monitoring and record-keeping activities required by the hazard control plan,
- confirming the operator's knowledge of actions to take in the case of a deviation, and
- observation of the operator performing activities.

5.0 References

Nil

6.0 Records

CCP/ OPRP validation Record

FSMS System validation record

PRP Verification record

FSMS verification report