

#### 1. What is HACCP?

HACCP (Hazard Analysis and Critical Control Points) is "a systematic approach to the identification, evaluation, and control of food safety hazards." It is an internationally recognized system used to identify and control Food Safety hazards. It is a preventative approach to Food Safety developed in the early 1970s by the Pillsbury Company and NASA, the National Aeronautics and Space Administration.

#### 2. Why is HACCP Needed for Packaging Suppliers?

Suppliers of packaging to food producing companies are part of the food industry. Food Safety starts at the packaging supplier and continues through consumption. Packaging suppliers, especially those with direct product contact and/or printed materials, are important Food Safety partners.

#### 3. What are the Packaging HACCP Models?

The Packaging HACCP Models are a series of publications designed to assist producers of food packaging with the implementation and installation of a HACCP program. They are designed to provide guidance in the development of HACCP plans. The Packaging HACCP Models have been created by the Food Safety Alliance for Packaging (FSAP).

**Food Safety Alliance for Packaging (FSAP) Initiative**: The FSAP Initiative is a project involving major food companies, packaging companies, food industry associations, and consultants. The team's primary goal is to provide guidance to packaging companies with an emphasis on packaging-related Food Safety concerns. The FSAP strives to elevate Food Packaging Safety Awareness and provide resources for tools and training for the Packaging Supply Chain.

#### 4. Who should use them?

The Packaging HACCP Models are intended to be used by companies supplying packaging components to food producers. They may be used by those packaging companies that are just beginning to implement HACCP and those wishing to evaluate their existing plan.

#### 5. Applying this Model – What to Expect

Upon reviewing this model and performing the applicable steps listed in sections 11 through 20 of this document, the plant will have implemented a basic HACCP program. The plant can expect to review existing documentation and create new documents. A small multi-disciplinary team will create the HACCP Plan and review and update it at least yearly. Upon following the steps and successfully completing the suggested documentation in this model, the plant's Food Safety program should be enhanced and meet the expectations of your customers.

#### 6. Definitions

- a. <u>HACCP Plan</u>: The written document which is based upon the principles of HACCP and which requires the procedures to be followed.
- b. <u>Hazard</u>: A biological, chemical, or physical agent that is reasonably likely to cause illness or injury in the absence of its control.
  - i. Chemical: e.g., Cleaning Compounds, Allergens, Pesticides, etc.
  - ii. Physical: e.g., Glass, Metal, Plastic, Wood, etc.
  - iii. Microbiological: e.g., Salmonella, Listeria, E. coli, etc.
- c. <u>Hazard Analysis</u>: The process of collecting and evaluating information on hazards associated with the packaging under consideration to decide which are significant and must be addressed in the HACCP plan. A list of hazards associated with raw materials

and each process step is compiled. Each hazard will be evaluated when determining Critical Control Points. The HACCP Team must consider where the end product will be used. Product safety concerns are considered during the hazard analysis, not quality concerns.

- <u>CCP</u>: Critical Control Point A step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
   i. CCP Validation/Verification plan: See section 21.
- e. <u>CP</u>: Control Point Any step at which biological, chemical, or physical factors can be controlled.
- f. <u>QCP</u>: Quality Control Point A step in the process where a quality parameter may be controlled.
- g. <u>PP</u>: Prerequisite Programs Existing Operating, Environmental, and support systems that allow the plant to produce safe products. Examples include, but are not limited to, Pest Control, Good Manufacturing Practices (GMP), and Preventive Maintenance. Examples and more information are provided in Appendix A.

#### 7. Common Approach for HACCP Implementation Action steps appear as Items 11 – 20 in this model

- a. Assemble HACCP Team (multi-disciplinary) See Item 11, Step 1
- b. Write Product Description (how is it made and what raw materials are used) See Item 12, Step 2
- c. Identify Target Audience (include markets and customers) See Item 12, Step 2
- d. Create Process Flow Diagram See Item 13, Step 3
- e. Verify Process Flow Diagram See Item 14. Step 4
- f. Identify Hazards
  - See Item 15, Step 5
- g. Perform Hazard Analysis
  - See Item 15, Step 5
- h. Determine if Critical Control Points (CCP) exist. (Some processes will not have CCPs) See Item 16, Step 6
  - 1. Use CCP Decision Tree (See Appendix B)
- i. Establish Critical Control Point Limits (if applicable)
  - See Item 17, Step 7
- j. Establish Monitoring Procedures for Critical Control Points (if applicable) See Item 18, Step 8
- k. Establish Corrective Actions for Critical Control Point Deviations (if applicable) See Item 19, Step 9
  - Verify HACCP Plan See Item 20, Step 10

### 8. Applying the Packaging HACCP Model

The most common area for CCPs in the packaging industry is that of allergen issues due to mixed labels or materials. The following prerequisite programs must be in place to mitigate this potential issue:

a. Design control – each design must have a unique method for identification to ensure the ability to keep all plates, cylinders and other printing media separate to prevent the mixing of individual print media between production orders.

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- b. Line Clearance the facility must have adequate procedures to ensure that all printed material, labels and containers are removed from machine centers prior to processing the next production run to prevent the mixing of materials.
- c. Finished roll, box and container control the facility must have adequate procedures to ensure the segregation of printed rolls, boxes and containers at each production step and rework areas to prevent the mixing of materials.
- d. Pallet Assembly and control the facility must have adequate procedures to ensure the segregation of pallets and associated packing labels to prevent the mixing of materials, labels or shipment of incorrect materials.
- e. It must be noted the Critical Control Points outlined in this model are only POTENTIAL CCPs. The plan may/will vary depending on your processes and programs.

#### 9. HACCP Training

- a. HACCP Team Leader It is recommended that this person has formal training from an accredited organization. (See FSAP website)
- b. HACCP Team Members Team members should receive formal documented training from the team leader or person knowledgeable in HACCP.
- c. Plant Employees Should receive documented training upon hiring and at least annually thereafter.
- d. Those with CCP Monitoring Responsibility Shall receive documented training specific to the CCP they monitor in addition to annually plant-wide training.
- e. Training Records HACCP training must be documented and the records maintained per the plant record retention policy.

#### 10. Record Keeping & Documentation

Records provide evidence that procedures are being followed and CCPs are monitored as required. They provide objective evidence to internal and external auditors. As in ISO 9000, if something is not documented, it's not done.

- Types of documents plant will need: Expected documentation is listed in section 11 20 of this model. In short, the plant documentation will include: the HACCP Plan; Hazard Analysis; HACCP Procedures; HACCP Records; a list of HACCP trained personnel and team members; and, supporting documentation from the Prerequisite Programs (Appendix A).
- b. Completing HACCP Records: HACCP records shall be completed at the time of use. Information shall be recorded in permanent ink.
- c. Review of HACCP Records: CCP records should be reviewed by a trained company representative prior to releasing an order for shipment. The review must be documented.
- d. Proper documentation practices: The plant should follow proper documentation practices such as prohibiting the use of correction fluid (white-out) and pencil on permanent records. Also, changes to entries should be made using a single line-out along with initialing and dating the change. A documentation practices procedure should be in place.
- e. HACCP Record Retention: The plant's record retention policy should include a retention time for HACCP records. In many cases, this will be two years.

#### PREPARING YOUR HACCP PLAN

### 11. Step 1: Assemble HACCP Team

- a. Cross Functional Team
- b. Management Sponsorship / Buy-In / Participation
- c. HACCP Training
- d. <u>Documents</u>: Team List / Charter with Management Sign-Off / Generic Facility Training Log

Facility HACCP Team				
Facility Name: StanLee Packaging, Marvel Facility		Date: June 30, 20XX		
Team Member Name	Team Member Name	Team Member Name	Team Member Name	
C. Kent	C. Kent	C. Kent	C. Kent	
D. Prince	D. Prince	D. Prince	D. Prince	
S. Kyle	5. Kyle	5. Kyle	5. Kyle	
B. Banner	B. Banner	B. Banner	B. Banner	
P. Parker	P. Parker	P. Parker	P. Parker	
B. Wayne	B. Wayne	B. Wayne	B. Wayne	

#### Facility HACCP Charter Used comp can model

Facility Name: StanLee Packaging, Marvel Facility

Date: June 30, 20XX

The purpose of the facility HACCP Team is to ensure safe products for our customers and their consumers. The HACCP Team will evaluate raw materials and processes to determine Critical Control Points. Critical Control Points will be monitored as will other points and processes. The team will provide documented training for the facility. The facility HACCP Plan will be re-assessed at least annually. Facility management will provide adequate resources for the implementation and maintenance of the HACCP Program.

Sign-Off and Approval				
Position	Name	Signature		
HACCP Team Leader	C. Kent	C. Kent		
Management Representative	L. Jefe	L. Jefe		
HACCP Team Member	D. Prince	D. Prince		
HACCP Team Member	S. Kyle	5. Kyle		
HACCP Team Member	B. Banner	B. Banner		
HACCP Team Member	P. Parker	P. Parker		
HACCP Team Member	B. Wayne	B. Wayne		

Facility Training Log						
Subject	HACCP Hazard Analysis	HACCP Hazard Analysis				
Date(s)	July 15, 20XX					
Trainer's Name & Title	C. Kent - Food Safety Mana	ger				
Materials Used	CCP Decision Tree, Internal	' SOPs				
Print Name	Title	Date	Trainer			
R. Secrest	Plant Manager	7/15/20XX				
P. Abdul	Quality Systems Engineer	7/15/20XX				
S. Tyler	Maintenance Supervisor	7/15/20XX				
J. Lopez	Customer Technical Service	7/15/20XX				
S. Cowell	CI Coordinator	7/15/20XX				
R. Jackson	Quality Manager	7/15/20XX				

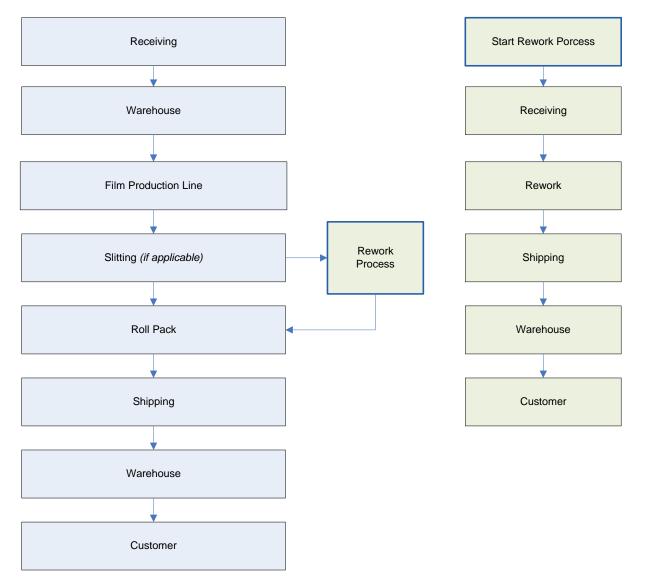
## 12. Step 2: Write Product Description

- a. What do you make
- b. How do you make it
- c. Intended usage (include time and temperature as applicable)
- d. What Raw Materials are used
- e. Intended markets / customers
- f. Document: Written Descriptions of what is made and production process

Product / Product Category Description				
Facility Name:       StanLee Packaging, Marvel Facility       Date: July 30, 20XX				
Product/Product Category	Flexible Packagin	g Film		
Process	Blown / Cast; mar	nufacture of film products - Non Printed		
Food Safety Characteristics	Direct/Indirect/Non-Food Contact. Applied labeling (if any) must be accurate to prevent/eliminate the potential for mislabeling of finished products that could lead to allergen and /or regulatory food safety labeling non-compliance. Measures must also be instituted for the prevention of introduction of foreign objects such as metal contamination.			
Customer Use	Frozen vegetables, Cheese Slices, Meat Products, Cereal/Cracker Innerliner			
Target Market/Consumer	Food, Meat & Dairy, Healthcare markets. General Public			
General Raw Materials	Supplied resins a	nd additives		
Packaging/Palletization	Bagged, Palletize	d and Stretch wrapped		
Shelf Life	1 year, TBD-Various			
Storage & Distribution	-20°F - 120°F; protect from moisture			
Other	None (in this exa	mple)		

#### 13. Step 3: Create Process Flow Diagram (PFD)

- a. Block Diagram showing manufacturing steps
- b. Include Receipt of Raw Materials and Shipping of Finished Goods
- c. Document: Process Flow Diagram
- d. Note: Add CCPs (if any) to PFD after Step 6



#### 14. Step 4: Verify Accuracy of Process Flow Diagram (PFD)

- a. Team walks through plant with PFD
- b. Confirm PFD with team and plant floor workers
- c. Make necessary changes before proceeding
- d. Document: Edited Process Flow Diagram / Signed / Approved

#### 15. Step 5: Perform Hazard Analysis

- a. Evaluate Raw Materials for Chemical, Physical, Biological Hazards
- b. Evaluate Processes for Chemical, Physical, Biological Hazards
- c. Document: Hazard Analysis Sheet for Raw Materials

d. Document: Hazard Analysis Sheet for Processes

# List every Bill of Material used in the manufacturing process for population into Column 1 of Raw Material Hazard Analysis table.

**Instructions**: Identify potential hazards associated with incoming materials and rework. Assess to the best of your knowledge the likely risk associated with these materials and identify any specific preventive programs or corrective steps that eliminate or reduce those risks to an acceptable level.

### **Raw Material Hazard Analysis**

Facility Name: StanLee Packaging, Marvel Facility

Date: August 24, 20XX

1	2	3	4	5	6
List each raw material/ingredient in the process	Does this material/ ingredient INTRODUCE a potential food safety hazard? Identify here. (Be as specific as possible when listing the hazard.) C = Chemical P = Physical B = Biological	Is this hazard CONTROLLED by a Prerequisite Program or process step? If YES, identify the Program or process. If a Prerequisite Program or process is identified, do not complete Columns 4-6 and go to next process step. If NO, go to Column 4.	Is this hazard ELIMINATED by a subsequent (later) process step? If YES, this step is NOT a CCP. Identify the subsequent process step in Column 5 and proceed to the next process step. If the hazard is eliminated at this step (no subsequent elimination step) enter NO and go to Column 6 and assign a CCP number.	Identify the last process step that will eliminate the potential hazard. (Example: metal detector, filter, etc.).	Assign a CCP number when the answer in Column 4 is NO. Otherwise leave blank.
	C:				
Resins/Additives	P: Foreign Material	Yes, Receiving Inspection, GMP			
	B:				
Pallets, Packing materials	C: Off-Odor	Yes, Specification to exclude using wood preservatives on pallets, incoming inspection			
	P: Foreign	Yes, Receiving			
	Material	Inspection, GMP			
	B:				

# **Process Hazard Analysis**

Facility Name: StanLee Packaging, Marvel Facility

Date: August 24, 20XX

1	2	3	4	5	6
List each process step from the Process Flow Diagram. <u>Also</u> , bring forward each ingredient from the Material Hazard Analysis Worksheet that was determined to be a Critical Ingredient.	Does this ingredient or process step INTRODUCE a potential food safety hazard? Identify here. (Be as specific as possible when listing the hazard.) C = Chemical P = Physical B = Biological	Is this hazard CONTROLLED by a Prerequisite Program or process step? If YES, identify the Program or process. If a Prerequisite Program or process is identified, do not complete Columns 4-6 and go to next process step. If NO, go to Column 4.	Is this hazard ELIMINATED by a subsequent (later) process step? If YES, this step is NOT a CCP. Identify the subsequent process step in Column 5 and proceed to the next process step. If the hazard is eliminated at this step (no subsequent elimination step) enter NO and go to Column 6 and assign a CCP number.	Identify the last process step that will eliminate the potential hazard. (Example: metal detector, filter, etc.).	Assign a CCP number when the answer in Column 4 is NO. Otherwise leave blank.
Receiving	C: P: Foreign Material B:	Yes, Receiving Inspection, GMP			
Warehouse	C: P: Foreign Material B:	Yes, Receiving Inspection, GMP			
Film Production	C: P: Foreign Material B:	Yes, Receiving Inspection, GMP, Magnets, Screen Packs			
Slitting	D C: P: Foreign Material B:	Yes, GMP			
Roll Pack	D: P: Foreign Material B:	Yes, GMP			
Shipping	C: P: Foreign Material	Yes, GMP			

1	2	3	4	5	6
List each process step from the Process Flow Diagram. <u>Also</u> , bring forward each ingredient from the Material Hazard Analysis Worksheet that was determined to be a Critical Ingredient.	Does this ingredient or process step INTRODUCE a potential food safety hazard? Identify here. (Be as specific as possible when listing the hazard.) C = Chemical P = Physical B = Biological	Is this hazard CONTROLLED by a Prerequisite Program or process step? If YES, identify the Program or process. If a Prerequisite Program or process is identified, do not complete Columns 4-6 and go to next process step. If NO, go to Column 4.	Is this hazard ELIMINATED by a subsequent (later) process step? If YES, this step is NOT a CCP. Identify the subsequent process step in Column 5 and proceed to the next process step. If the hazard is eliminated at this step (no subsequent elimination step) enter NO and go to Column 6 and assign a CCP number.	Identify the last process step that will eliminate the potential hazard. (Example: metal detector, filter, etc.).	Assign a CCP number when the answer in Column 4 is NO. Otherwise leave blank.
	B:				
Warehouse	C: P: Foreign Material B:	Yes, GMP			
Roll Doctor Rework	C: P: <i>Foreign</i> <i>Material</i> B:	Yes, GMP			

### 16. Step 6: Determine Critical Control Points (CCPs)

- a. Use CCP Decision Tree (See Appendix A)
- b. Confirm CCPs Using CCP Definition on Page 3
- c. Document: Product/Process Hazard Analysis Worksheets
- d. Document: CCPs on HAACP Master Plan

#### 17. Step 7: Establish Critical Limits for CCPs (if applicable)

- a. Critical Limits must be meaningful; should be measurable
- b. Document: HACCP Master Plan

# 18. Step 8: Establish Monitoring Procedures for Critical Control Points (if any)

- Identify how Critical Limits will be monitored; by whom; frequency; documentation requirements
- b. Training for those performing the CCP monitoring
- c. Documents: HACCP Master Plan

# 19. Step 9: Establish Corrective Actions for Critical Control Point Deviations (if applicable)

- a. Identify Corrective Action for CCP checks falling outside of Critical Limits
- b. Evaluation of products from previous CCP check
- c. <u>Document</u>: HACCP Master Plan

# HACCP Master Plan

 Facility Name: StanLee Packaging, Marvel Facility
 Date: October 5, 20XX

 HACCP Plan Name / Number: Film Manufacturing / FLMMF61

1	2	3	4	5	6	7	8	9	10
				Monitoring					
ССР	Significant Hazard	Critical Limit	What	How	Frequency	Who	Corrective Action(s)	Verification	Record(s)
NONE									
In This Sample Model									

Approved By: (Signature, Title,	C. Kent, Food Safety Manager, October 12, 20XX
and Date)	C. Rend, Food Supery Munuger, Occober 12, 2011

#### 20. Step 10: HACCP Plan Validation

- a. Are CCPs meaningful, measurable?
- b. Have all risks been identified, evaluated?
- c. Have Raw Materials changed?
- d. Has process or equipment changed?
- e. Documents: Reassessment Log / Change Log / History / Meeting Minutes

#### 21. HACCP Plan Verification and Validation

In short, Verification confirms that the HACCP plan is being followed and Validation confirms that the HACCP plan properly addresses the appropriate activities. Verification and validation activities must be documented.

- a. Verification: Includes activities such as: an annual internal (or external) audit to confirm the HACCP plan is being followed as written; confirmation of operator training; confirmation of operator competence with respect to monitoring CCPs and addressing out-of compliance occurrences; HACCP record review; previous HACCP plan audits; and, spot-checking prerequisite programs. Verification assures that the HACCP plan is operating effectively on a day-to-day basis.
- b. Validation: Includes activities such as: critical review of the hazard analysis for depth and accuracy (i.e., were all hazards considered? Were the correct CCPs chosen?); critical evaluation of the CCPs (i.e., are critical limits meaningful and actionable?); and, monitoring activities (i.e., are the correct parameters monitored at the correct frequency?). Validation provides evidence that the techniques and methods adopted by the plant are not just effective in theory, but will in fact work for the specific plant.

#### 22. HACCP Plan Reassessment

The HACCP plan needs to be reassessed on an annual basis at minimum and/or when there are: changes to the plant; changes in key processing equipment; changes to primary raw materials; industry alerts concerning materials, processes, or equipment; industry/facility recalls; repeated/trended customer complaints; and, any change in any materials, processing, or equipment that would lead to challenges to the HACCP Plan Validation.

#### 23. Various HACCP Forms

Blank copies of documents presented in Sections 11 – 20 are available on the FSAP website: <u>www.foodsafetyallianceforpackaging.com</u>

### **HACCP Plan Reassessment Checklist**

#### HACCP PLAN REASSESSMENT CHECKLIST

#### **EXAMPLE** (see Process Flow Diagram section below)

The purpose of this checklist is to provide a guide for reassessing a HACCP Plan. A complete and signed checklist provides documentation that a reassessment of a HACCP Plan has taken place. A HACCP Plan Reassessment Checklist should be completed for each HACCP Plan.

If changes are needed in any section of the HACCP Plan, a HACCP Plan Reassessment Form must be completed.

Facility Name:	StanLee Packaging, Marvel Facility	Person(s) Responsible:	W. Wiksell, D. Reyes
HACCP Plan Name/Number and Date:		Film Manufactur	ing / FLMMFG1 Oct. 12, 20XX

PRODUCT DESCRIPTION(s):		
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	
Changes Needed? (Choose Yes or No)	Yes	No
HACCP Plan Reassessment Change Form Completed?	Yes	No
Comments: None		

TARGET AUDIENCE:				
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	<u>/</u>		
Changes Needed? (Choose Yes or No)	Yes	No		
HACCP Plan Reassessment Change Form Completed?	Yes	No		
Comments: None				

PROCESS FLOW DIAGRAM: Dryer system ch	ange	
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	(
Changes Needed? (Choose Yes or No)	Yes	No
HACCP Plan Reassessment Change Form Completed?	Yes	No
Comments: <i>Change made to dryer system on the flow diagram. See comments on reassessment</i>		o significant change to

HAZARD ANALYSIS: (Each step in the proce	ess flow diagram must be add	Iressed)
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	X
Changes Needed? (Choose Yes or No)	Yes	No
HACCP Plan Reassessment Change Form Completed?	Yes	No
Comments: None		

#### IDENTIFICATION OF CRITICAL CONTROL POINTS:

Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	
Changes Needed? (Choose Yes or No)	Yes	No
HACCP Plan Reassessment Change Form Completed?	Yes	No
Documentation on file to support selection of CCPs?	Yes	No
Comments: None		

ESTABLISHMENT OF CRITICAL LIMITS:		
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	
Changes Needed? (Choose Yes or No)	Yes	No
HACCP Plan Reassessment Change Form Completed?	Yes	No
Documentation on file to support establishment of critical limits?	Yes	No
Comments: None		

CCP MONITORING PROCEDURES:		
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	
Changes Needed? (Choose Yes or No)	Yes	No
HACCP Plan Reassessment Change Form Completed?	Yes	No
Monitoring records are being filled out correctly?	Yes	No
Comments: None	· · ·	

CORRECTIVE ACTION:		
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	(
Changes Needed? (Choose Yes or No)	Yes	No

HACCP Plan Reassessment Change Form Completed?	Yes	No
Corrective Action records are being filled out correctly?	Yes	No
Comments: None		

RECORD KEEPING PROCEDURES:		
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	
Changes Needed? (Choose Yes or No)	Yes	No
HACCP Plan Reassessment Change Form Completed?	Yes	No
Accurate and current record keeping forms are being used?	Yes	No
Comments: None		

VERIFICATION PROCEDURES:		
Reassessor(s): W. Wiksell, D. Reyes	Date: October 26, 20XX	
Changes Needed? (Choose Yes or No)	Yes	No
HACCP Plan Reassessment Change Form Completed?	Yes	No
Documentation on file to support verification?	Yes	No
Comments: None		

Additional Comments or Observations:

No changes identified during this review. D. Reyes, October 26, 20XX

# HACCP Plan Reassessment Change Form

#### HACCP PLAN REASSESSMENT CHANGE FORM

#### EXAMPLE

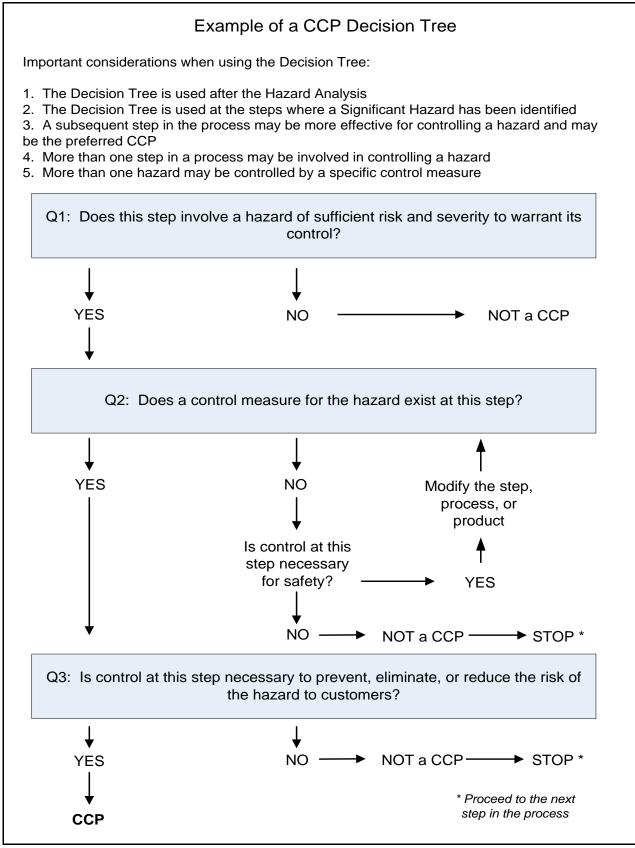
Facility Name:	StanLee Packaging, Marvel Facility	Person(s) Responsible:	W. Wiksell, D. Reyes
HACCP Plan Na	me/Number and Date:	Film Manufactu	ring / FLMMFG1 Oct. 12, 20XX

During the reassessment of this plan, the person(s) responsible listed above has/have determined that Changes, Additions, or Deletions were needed. Those changes are documented below. Also attached is information used to support modification(s) of this plan.

Check One:	x	CHANGE		ADDITION		DELETION
------------	---	--------	--	----------	--	----------

In mid 20XX, the	facility replaced the chilled water system for screw cooling
Why was it Chan	ged / Added / Deleted?
•	oling system was more than +xx years old and was not capable of achiev. ductions of XX °F.
What is the basis	for the Change / Addition / Deletion?
The above change	e does not impact the flow diagram or other aspects of the HACCP plan.

### Appendix A – CCP Decision Tree



#### References

National Advisory Committee on Microbiological Criteria for Foods (NACMCF), 1998. Hazard Analysis and Critical Control Point Principles and Application Guidelines. *Journal of Food Protection*. 61: 1246-1259.

National Food Processors Association, 1999. *HACCP – A Systematic Approach to Food Safety*. The Food Processors Institute, Washington, D.C.

U.S. Department of Agriculture, 1999. *Guidebook for the Preparation of HACCP Plans*. Food Safety and Inspection Service, Washington, D.C.

U.S. Food and Drug Administration, Department of Health and Human Services, 2008. *Code of Federal Regulations*, Title 21 Food and Drugs Part 110, Washington, D.C.

#### Disclaimer

Implementation and or execution of this model will guide the user in the installation of a Food Safety system. It will not guarantee business from any of the former, current, and/or future FSAP member companies. Furthermore, the implementation and or execution of this model will not guarantee the safety of your product.