

HACCP Plan Requirements for Special Processes Requiring a Waiver Checklist

All special processes such as smoking, curing, using food additives as a method of preservation or to render food so that it is not time/temperature control for food safety (TCS), packaging TCS food using reduced oxygen packaging (ROP) (unless meeting exemptions listed in the 2013 FDA Food Code, 3-502.12), operation of molluscan shellfish tank utilized for human consumption, custom processing animals for personal use, sprouting seeds/beans or preparing food by another method that is determined to require a waiver will require a waiver from this Department. All special processes require a HACCP plan.

HACCP plans and Standard Operating Procedures need to be tailored to your specific process. Sample HACCP forms and SOP's for various processes are provided by the Department.

ALL HACCP PLANS REQUIRE THE FOLLOWING: (CHECK FOR ADDITIONAL REQUIREMENTS BY PROCESS)

- Provide a list of all facilities, with permit numbers (if currently licensed), that are utilizing the plan to prepare or hold foods. Additionally, provide a separate list of all facilities, with permit numbers, that are holding but not preparing foods produced using a special process.
- Provide a detailed **Process Flow Diagram** including all Critical Control Points (CCPs). Diagram must address the general preparation steps of the food(s) through the special process.
- Provide a **list of all ingredients** for each menu item used in the special process. Ingredient proportions are not necessary unless specifically asked for. Also provide detailed preparation steps for each menu item.
- Provide specifications for materials used to bag food in the reduced oxygen packaging process.
- Provide **specifications for the equipment** used in the special process. All equipment must meet the NSF Standard or equivalent. Specifications for equipment like vacuum packaging machines, immersion circulators, smokers etc. are necessary, but specifications for equipment like grills, cook tops, refrigeration etc. are not.
- Provide a **training plan or training program** for food handlers in the special process or processes used within the facility. The training program must demonstrate that the individual responsible for reduced oxygen packaging understands:
 - (i) concepts required for safe operation
 - (ii) equipment and facilities
 - (iii) operational procedures described in the HACCP plan and must include a training log(s).
- Provide a **Guide to Hazards Worksheet** for each special process.
- Provide a **Hazards Worksheet** for each special process.
- Provide a **HACCP Worksheet** for all Critical Control Points listed in the Process Flow Diagram.

SOPs: (REQUIRED FOR ALL PLANS) – SOPs are standard SOPs and will need to be adjusted for the specific HACCP Plan to which they apply. Things like temperature issues and relabeling issues must be addressed, with corrective actions listed, in the SOPs as specified by your plan.

- Provide a **Personal Hygiene Standard Operating Procedure (SOP)**.
- Provide a **Hand Washing Standard Operating Procedure (SOP)**.
- Provide an **Employee Health Policy**.
- Provide a **Cleaning and Sanitation Program Standard Operating Procedure (SOP)**.
- Provide an **Eliminating Bare Hand Contact Standard Operating Procedure (SOP)**. Please note that bare hand contact is not allowed when using a special process to prepare food. SOP must address this requirement.
- Provide a **Using and Calibrating a Thermometer Standard Operating Procedure (SOP)** with Log.
- Provide a **Labeling Standard Operating Procedure (SOP)**. SOP must address all required dates for special process, including labeling that must be updated due to changes in temperature like freezing or product that is out of temperature.

Smoking

If your operation is smoking food as a method of preservation and not for flavor enhancement, a HACCP Plan is required. If you are smoking food, but during the smoking process the food reaches regulatory required cooking temperatures, a HACCP Plan may not be required. If you are smoking in any form and using reduced oxygen packaging a waiver and HACCP plans are required.

Additional Requirements for HACCP Plans for Smoking Food for Preservation

- Provide a completed **Special Processes Waiver Request Form**.
- Provide written validation of the HACCP Plan and process from a Processing Authority which utilized the national Advisory Committee on Microbiological Criteria for Foods (NACMCF)
- All other applicable SOPs and Logs required for your plan.

Curing

- Provide a completed **Special Processes Waiver Request Form**.
- Provide written validation of the HACCP Plan and process from a Processing Authority which utilized the national Advisory Committee on Microbiological Criteria for Foods (NACMCF)
- All other applicable SOPs and Logs required for your plan.

Using Food Additives as a Method of Preservation or to render a food Non-Temperature Control for Safety

(Example: Sushi Rice)

- Provide a completed **Special Processes Waiver Request Form**.
- Provide HACCP documentation listed above (required for all plans) and all applicable SOP's/Logs for your plan.
- Provide product authority review for Aw (water activity) and pH if necessary.

Packaging Time/Temperature Control for Safety Food Using a Reduced Oxygen Packaging Method (Waiver required if not following procedure as outlined in FDA Food Code 3-502.12)

- Provide a completed **Special Processes Waiver Request Form**.
- Provide HACCP documentation listed above (required for all plans) and all applicable SOP's/Logs for your plan.
- Provide product authority review for processing, A_w (water activity) and pH if necessary.

Operation of a Molluscan Shellfish Tank or Display Shellfish that are offered for Human Consumption

- Provide a completed **Special Processes Waiver Request Form**
- Provide vendor certification/buyer specifications.
- Provide SOP for **Commingling Protocol**.
- Provide SOP for **Culling Procedures Plan** (dead and cracked shellfish discarded).
- Provide SOP for **Record System for Retention of Shellfish Tags**.
- Provide SOP for **First In/First Out**.
- Provide SOP for **Program for Preventing Contamination (Tank and UV Disinfection System)**.
- Provide SOP for **Chemical and Cleaners Handling and Storage Requirements**.
- Provide SOP **Using and Calibrating a Thermometer** with Log.
- Provide a **Personal Hygiene Standard Operating Procedure (SOP)**.
- Provide a **Hand Washing Standard Operating Procedure (SOP)**.
- Provide an **Employee Health Policy**.
- Provide a **Cleaning and Sanitation Program Standard Operating Procedure (SOP)**.

HAACP plans should include critical control points for water temperature and water quality/coliform testing.

Custom Processing Animals for Person Use

- Provide a completed **Special Processes Waiver Request Form**
- Provide Vendor Certification Programs and Buyer Specifications
- Equipment Specifications/Manufacturer's Instructions and Operational Manual
- Provide a **Personal Hygiene Standard Operating Procedure (SOP)**.
- Provide a **Hand Washing Standard Operating Procedure (SOP)**.
- Provide an **Employee Health Policy**.
- Provide **Packaging SOP** (Seal is complete-no debris in seal; labels; no cross contamination)

- “Not for Sale” tag/label, with corresponding record number from the original tag/label, provided for shelves or containers holding custom processed animals or animal products.
- Provide SOP for separate storage areas in cold storage units for Custom Processes meat products
- Provide SOP **Using and Calibrating a Thermometer** with Log
- Records (carcasses tags identified, written list, receiving log book and times when animals processed)
- Provide a **Cleaning and Sanitation Program Standard Operating Procedure (SOP)**.
- HACCP plans as per the listed required items above are required.

Sprouting Seeds or Beans

- Provide a completed **Special Processes Waiver Request Form**
- Provide a **Personal Hygiene Standard Operating Procedure (SOP)**.
- Provide a **Hand Washing Standard Operating Procedure (SOP)**.
- Provide an **Employee Health Policy**.
- Provide a **Cleaning and Sanitation Program Standard Operating Procedure**.
- Provide SOP for obtaining **Approved Seed Sources**.
- Provide SOP for **Water Quality and Management**.
- Provide SOP for **Protection of Food/Ingredients from Chemicals/Contamination**.
- Provide SOP for **Employee Training**.
- Provide SOP for **Facilities/Equipment Maintenance**.
- Provide SOP for **Recipe/Menu Production Standards**.
- HACCP plans as per the listed required items above are required.



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