



HAZARD ANALYSIS CRITICAL CONTROL POINT (HACCP) AT RETAIL



A *Hazard Analysis and Critical Control Point* system, more commonly referred to as HACCP, is a systematic approach to the identification, evaluation, and control of food safety hazards by preventing, eliminating, or reducing those hazards to safe levels.

The basic steps of a HACCP plan include:

1. A Hazard Analysis.
2. Determine the Critical Control Points
3. Establish Critical Limits
4. Critical Control Point Monitoring
5. Corrective Actions
6. Verification Procedure
7. Record-Keeping Procedures

In accordance with Article 5 of the California Retail Food Code ([CRFC](#)), food facilities may engage in any of the following activities through the use of an HACCP plan. Contact your [Local environmental health services](#) to obtain information about HACCP requirements for the following food activities:

- Smoking food as a method of food preservation rather than as a method of flavor enhancement.
- Curing food by the addition of salt or in combination with one or more ingredients such as sodium nitrite, sugar, curing accelerators, and spices.
- Using food additives or adding components such as vinegar as a method of food preservation rather than as a method of flavor enhancement, or to render a food so that it is not potentially hazardous.
- Operating a molluscan shellfish life support system display tank used to store and display shellfish that are offered for human consumption.
- Custom processing animals that are for personal use as food and not for sale or service in a food facility.
- Preparing food by another method that is determined by the enforcement agency to require an HACCP plan.

Certain high risk food processes require that a HACCP plan must be approved, prior to implementation, by the California Department of Public Health, Food and Drug Branch (CDPH-FDB), specifically:

- Using acidification or water activity to prevent the growth of *Clostridium botulinum*. For more information on these activities see CDPH-FDB information on [Cannery License](#) requirements.
- Packaging potentially hazardous food using a reduced-oxygen packaging (ROP) method as specified in CRFC Section 114057.1.

Foods that have been vacuum-packaged or otherwise had oxygen removed from their packaging can put foods at additional risk for growth of certain bacteria and/or toxin formation (*Clostridium botulinum* (botulism), *Clostridium perfringens*, and *Listeria monocytogenes*). Implementing a complete and comprehensive HACCP plan will help ensure that food products that are vacuum-packaged at a retail food facility are safe.

A retail food facility that is required to have a [HACCP plan](#) for reduced oxygen packaging (ROP) must include plans and specifications as set forth in CRFC Health and Safety Code Sections 113801, 114057, 114057.1, 114419.1, 114419.2, and 114419.3:

Additional food safety controls are required for utilizing sous-vide and /or cook chill ROP methods. Guidance to determine sous-vide and /or cook chill ROP controls in the HACCP plan can be found in the [U.S. FDA Model Food Code, Section 3502.12\(D\) 1-4](#).

To request a CDPH-FDB ROP HACCP plan review, submit a hard copy of the ROP HACCP plan along with a completed Retail Food Program Service Request Application and fee, to the address on the application.

To decrease delays in review and processing, please include the following items in accordance with the principles of HACCP and CRFC ROP requirements, including but not limiting to:

1. Conduct and provide a Hazard Analysis.
2. Process Flow Analysis with listed Critical Control Points.
3. HACCP control plan- including controls required for sous-vide and/or cook chill process if applicable.
4. Monitoring and Verification Procedures.
5. Correction Action Procedures.
6. Standard Sanitation Operating Procedures.
7. Employee training procedures including a list of HACCP trained personnel.
8. Vacuum packaging equipment specifications.

Complete information on the retail HACCP requirements can be found in the [CRFC](#).

Additional Information about HACCP can be found at:

California Retail Food Code, Article 5 HACCP Exemptions

<https://www.cdph.ca.gov/services/Documents/fdbRFC.pdf>

CDPH Retail Food Program Service Request Application – HACCP review (CDPH6801)

<https://www.cdph.ca.gov/pubsforms/forms/CtrlForms/cdph8601.pdf>

U.S. FDA HACCP Principals and Application Guidelines

<http://www.fda.gov/Food/GuidanceRegulation/HACCP/ucm2006801.htm#princ>

Examples of Questions to be Considered When Conducting a Hazard Analysis

<http://www.fda.gov/Food/GuidanceRegulation/HACCP/ucm2006801.htm#app-c>

U.S. FDA Food Code – Annex 7 – Food Processing Criteria

<http://www.fda.gov/downloads/Food/GuidanceRegulation/UCM188557.pdf>