

# **Developing a HACCP Program**

**Some tips for the farmstead cheesemaker**

# Heading for HACCP?

You may find it oppressive, confusing, and time consuming but if you are reading this then you must be interested in learning more about HACCP, or Hazard Analysis Critical Control Points. Like Tang™, cordless drills, and biomedical lasers, the HACCP system got its start in the space program. The U. S. Army Natick Laboratories, along with NASA (National Aeronautics and Space Administration) and the Pillsbury Company, designed the HACCP system to produce safe foods for the astronauts. They didn't start out to develop a new system, initially they focused on 100% assurance of safe foods. Once they realized standard quality control methods wouldn't be enough, this group developed a logical system focused on identifying and controlling potential hazards to prevent food-borne disease. Within two years of the 1969 Apollo missions, Pillsbury began to apply HACCP in plants producing food for the rest of us. Since then, HACCP has gone international—from Europe to the far East, HACCP is recognized as an effective tool to produce the safest food possible.

Should you be using HACCP? Creating a HACCP plan takes time, work and commitment. However, done correctly, HACCP is a system that will help prevent food safety problems. In addition, as HACCP spreads through the food industry, your customers might be asking if you have a HACCP system in place. Your competitors might say yes.

## **HACCP is a safety program**

As you explore the HACCP system remember that HACCP is a safety program. Keep in mind the distinction between safety and quality and realize that HACCP is one part of your total program. After all, it is possible to produce a very safe product that just doesn't meet your quality standards.

Several resources are available to help you plan and implement HACCP. Consider starting with the Dairy Product Safety System, a technical manual published by the International Dairy Foods Association (IDFA). This comprehensive manual will take you from defining HACCP all the way through the steps needed to implement a program, including model programs for dairy plants. They are currently working on an updated edition, which should be ready in 2001.

This document is specifically adapted for the farmstead cheesemaker, although much of the information comes from the IDFA publication, which is a more thorough book that also covers manufacturing butter, ice cream and processing fluid milk.

## **Take the task apart**

One of the challenges that farmstead cheesemakers face as they develop a HACCP plan is carving out the time. Most cheesemakers already have too much to do, and, of course, many are doing it alone. It is unrealistic to think you can sit down and work out an entire HACCP plan. Instead, consider breaking it into parts. Annie Lamott, novelist and writing instructor, in her book "Bird by Bird" relates a story about her brother, frustrated and overwhelmed because he had a term paper due and he had procrastinated so long the task was feeling impossible. Desperate and tearful, he couldn't imagine finishing his entire paper, which was about birds. Lamott's father's advice was to "Just take it bird by bird." So, to paraphrase Lamott, you should take the task apart, approach it curd by curd and work on one cheese at a time.

Don't get hung up on the critical control points, or CCP's. Before starting a HACCP program, IDFA suggests that you evaluate and review existing programs. You might not have any formal program, but you probably already do some of these tasks informally. "Prerequisite programs" are the universal procedures, like GMP's (Good Manufacturing Practices) that control environmental conditions in a dairy plant in order to produce safe products. The name is deceptive, it doesn't have any key words like critical or hazard in it but don't be fooled—a prerequisite program is the foundation of every HACCP plan.

The IDFA manual outlines six prerequisite areas, including details to check and forms you can use to evaluate your program. The prerequisite areas include physical premises, receiving and storage, equipment performance and maintenance, personnel training programs, sanitation, and recall programs. **See Appendix A** for a chart adapted from IDFA which you can use to evaluate what you are already doing and what you might need to work on. Consider focusing on one prerequisite area each week, or each month, using IDFA's Prerequisite Programs Evaluation Form.

#### Start by describing each product

You might want to start your plan by describing each product you make. You'll eventually need a separate plan for each of your products, but just pick one cheese to start with. Consider composition, structure, processing, packaging systems, storage, and shelf-life. To keep on track, keep asking yourself, "Is this a hazard or a quality issue?"

Now, you'll need to organize a flow diagram. This is not an engineering feat, instead use words in boxes to illustrate the steps used to produce each product, like the example shown on page 17.

When you have a good, simple flow diagram you are ready to conduct a hazard analysis. Now you are getting to the core of the HACCP experience. For this purpose, a hazard is any microbiological, chemical, or physical property that threatens the safety of your product. Analyzing hazards involves asking a series of questions to get at the varied factors that influence the safety of food. For example, you might ask about the chances that your product could be contaminated with hazardous substances. Or the likelihood that your product will contain viable spore-forming pathogens. You also need to consider what preventive measures, if any, are available. When you are finished, you should be able to list the significant hazards of each step in the flow chart, along with the severity of the risk and preventive measures.

#### Identifying critical control points

Next, you can identify critical control points, or CCP's. They originate from the hazard areas you already identified and include things like the temperature of incoming milk, or pasteurization times and temperatures. **Many hazard areas may already be controlled by your prerequisite programs, the ones that aren't must be identified as CCP's.**

Now that you have a list of CCP's you need to set some parameters for them. Start by setting critical limits for each CCP, the limit that must be met to assure safety. Use regulatory standards, literature searches, experimental studies and your experiential knowledge to set your critical limits. Monitoring these critical limits is also built into your HACCP plan and you use it to determine and record when a CCP has exceeded the critical limit. Ideally, monitoring should be 100% accurate and quick. That's why physical and chemical methods, like measuring pH and temperature, are more effective tools than microbiological testing.

Documentation and verification are built into HACCP plans. Corrective action plans for dealing with deviations from CCP's need to be documented and recorded. Your documentation should also include all records for CCP's, the monitoring systems, a list of the team, the flow diagram, etc.

Like many other systems and processes, HACCP is really never finished. You should conduct a full review at least annually. In addition, new product development, new hazards, and manufacturing changes are all situations that prompt a HACCP evaluation. Employee training and education is another ongoing process. Your entire staff needs to become familiar with the overall principles of HACCP and their part in the HACCP system.

#### Resources

The USDA/FDA Foodborne Illness Education Information Center is an excellent source of information about foodborne illness and how to prevent it. Two databases are maintained: The Foodborne Illness Educational Materials Database and the Hazard Analysis Critical Control Points (HAACP) Training Programs and Resources Database. Start at their website and follow the links.

<http://www.nal.usda.gov/foodborne/about>

# Mary Falk's Prerequisite Program



For  
Trade Lake Cedar



## Milk receiving

Milk is stored in sterile disposable milk bags and stored in ice water in a chill tank that is kept below 35°F. The temperature of the chill tank is charted twice a day. The temperature chart is hanging on the milk house wall.

The milk is screened for antibiotic residue and sampled for plate count and SSC on a “per vat “ basis. If milk is verified as “positive “ for drug residue, the milk is discarded. Test results of antibiotic screening are charted. The chart is on the shelf in the cheese make room. Tests results for PLC and SSC are dated and filed in “Milk History” folder. If tests results violate LoveTree’s milk receiving guidelines, patron is notified and receives a warning. If milk is again received from same patron that violates LoveTree’s receiving guidelines, milk will be refused from patron until tests prove that problem has been resolved.

Milk equipment is washed in accordance with good dairy hygiene practices after every milking. Twice a week the equipment is washed in dairy grade acetic acid, and twice a week the equipment is washed in a chlorinated alkaline cleanser. The rest of the washings use a food grade detergent. After every washing the equipment is sanitized with a food grade chlorine sanitizer using no less than 100ppm. The chlorine level is tested with chlorine test strips and charted. When the milk “bucket “ is full, it is immediately strained and placed in disposable bags in the chill tank.

*Dave Falk starts the cheesemaking process by milking the sheep at Lovetree Farm*



## Mary's Notes

*Dave and I realized that it was necessary to demonstrate to our customers (and ourselves) that we produce a safe and wholesome product. In order to achieve this, we needed to implement a HACCP plan for Lovetree Farmstead cheese.*

## Milk storage

The temperature of the chill tank is monitored twice a day and kept under 35°F. The milk is stored in sterile disposable bags made specifically for milk storage. (The bags are purchased from General Film Inc.) The chill tank temperature is charted twice a day. The chart is kept hanging on the wall in the milk house. The chlorine is added to the chill tank water and monitored at 100ppm on a daily basis, and that chart hangs on the wall, too.

In accordance with the regulations of the state of Wisconsin and Mary Falk's certification, all milk is screened for antibiotic residue utilizing the Penzyme test kit. The milk is tested on a "per vat" basis. If milk testing procedure validates positive drug residues in milk, then milk is discarded. The chill tank is cleaned out once a week with detergent and an acid wash.



## Mary's Notes

*It takes a while to develop a new habit. Charting the milk storage temperatures is simply recording what you do with your eyes on a daily basis. Hang the clipboard by the chill tank so it is in plain view. Tie the pen or pencil to the clipboard so you don't have to look for one when you are in a hurry.*



## Dry ingredient receiving/ storage

Salt is received in 50 pound bags and poured into a sealed tote that protects it from possible contamination. (water, dust, chemicals, etc) The lot number of the bag of salt is charted and dated and kept in the Dry Ingredient folder.



Cedar boughs are washed and sanitized and air dried on sanitized racks in the cheese room. The sanitizer is monitored for 100 ppm by using chlorine test strips. The chart for monitoring the sanitizer is kept on the desk in the make room.

## Mary's Notes

*Implementing a HACCP plan made us motivated to get organized. Even though we "knew" that the products we used in the plant were approved for use in food manufacture, HACCP showed us how to organize the ingredient information. Now, if we ever need to recall our product we simply need to follow the audit trail.*

## Cheese vat



The cheese vat is washed after every make of cheese. The vat is also cleaned weekly with a chlorinated detergent and an acid wash. The vat is sanitized using a chlorine sanitizer of no less than 100ppm. The chlorine level is monitored using chlorine test strips and charted no less than twice per production day, and/ or whenever a new solution is made. The chart is kept on the wall in the cheese make room. The cleaning chemicals are kept on the bottom rack of the storage shelf next to the sink in the cheese make room and are measured out according to manufacturers directions.

## Mary's Notes

*When you order your chlorine test strips, order as many as you can afford. That way they will be always be in stock. It is easier to get out of the habit of testing if you run out of supplies like the chlorine test strips.*





## Mary's Notes

*This is a good time to get in the habit of charting the lot numbers of your starter. The information can help you track down any problems in production quality along with helping you follow an audit trail in the event of a recall.*

## Starter

The starter is a direct vat set purchased from a starter company. The lot number is charted and dated and kept in the Dry Ingredient section of the Ingredient Receiving folder. The starter is stored in the freezer, for long term storage (10°F), or in the cooler for short term storage (38°F). The temperature of the refrigeration units are charted twice a day, and the chart is kept in the unit. All starters are stored in Ziploc bags to prevent contamination.

## Rennet

Rennet is purchased from a reputable supplier. The lot number is charted and dated and kept in the Fluid Ingredient section of the Ingredient Receiving folder. Rennet is stored in a cooler at 38°F. The temperature of the cooler is charted twice a day, and the chart is kept in the cooler.

## Water

Water is tested according to the regulations in Wisconsin for dairy plant water testing. Test results are kept in my Regulatory file.

## Forms

The cheese forms are food grade approved and washed and cleaned after each cheese make with an acid wash or a chlorinated alkaline cleanser. The forms are sanitized with no less than 100ppm. Sanitizer is tested no less than twice during a production day, and whenever a new solution is made.



## Drain table

The pH of the cheese is monitored using pH test strips to check for proper acid development before salting (A sample of the cheese is pureed in an electric mill and then tested.) A pH of 5.10 is the target pH.

The pH of the cheese is charted on the corresponding Cheese Make Sheet. If the pH is higher than 5.2, then the cheese is not salted and allowed to sit for another 12 hrs. If, after 12 hrs, the pH is still not at 5.1, then the cheese is salted and the information is charted on the Make Sheet for future reference. The cheese is dry salted and the whey allowed to drain off. The whey is disposed of by feeding to livestock.



## Mary's Notes

*I used to routinely use a pH meter but since I had chronic problems with my meter, I switched to pH test strips. I compared test strip readings to pH monitor readings and was pleasantly surprised to see how accurate the strips are.*



## Mary's Notes

*By permanently identifying each wheel of cheese I retain flexibility in the aging room. I can now shuffle my cheeses around without worrying about losing track of "who they are!"*

### Drain table, continued

Each wheel of the raw milk cheese is permanently identified with its corresponding lot number etched into the wheels with a hot brand. The lot numbers are printed on the cheese Make Sheets and stored in the Make Sheet folder where the date of each lot number of cheese is also recorded.

The drain table is washed after every make of cheese using a chlorinated detergent at least once a week, and an acid wash at least once a week. The drain table is sanitized using a chlorine sanitizer of no less than 100ppm. The chlorine level is monitored using chlorine test strips and charted no less than twice during a production day, and/ or whenever a new solution is made. The chlorine test chart is kept on the wall in the cheese make room. The cleaning chemicals are kept on the bottom rack of the storage shelf next to the sink in the cheese make room and are measured out according to manufacturers directions.

## Aging

The cheese is carried to the cave in clean, sanitized and sealed totes. The cheese is placed on top of sanitized cedar boughs which are placed on waxed boards in the fresh air aging cave for no less than 2 months at no less than 38°F. The cheese is aged at an average temperature of 55°F. The temp of the cheese “cave” is charted daily and the chart is kept in the aging cave. The cheeses are turned and inspected no less than twice a week.



The cheese shelves are washed on a weekly basis with a mixture of acetic acid and water. The cedar boughs are disposed of after the aging cheese has been removed, or if the integrity of the cedar starts to degrade.



## Mary's Notes

*By charting the aging temperatures, I can track fluctuations in temperature. This helps me to evaluate cheese characteristics and/or defects while also showing that we are meeting the legal temperature requirements.*

### Aging, continued

The floor of the cave is washed and swept at least twice a week. Worn boots are left at the door of the cave, and clean boots that are designated for cave use only are put on when entering the cave.



## Mary's Notes

*I absolutely LOVE the smell of a good, moldy, clean cave! When we wash the floors, we help the humidity level in the cave at that same time that we disrupt any nasty bacterial activity. We prefer using manual acid cleaners on the floor and only occasionally use chlorine. (NEVER use chlorine and acid together!!!!)*

## Packaging

Cheese that is at least 61 days old is transported in clean, sanitized and sealed totes to the cheese make room where the cheese is readied for shipping.

The cheese is placed in clean and sanitized racks and washed with a 50/50 solution of apple cider vinegar and allowed to air dry. The cheese is then weighed and wrapped for shipping/delivery. The customer's name ( and store location if required), lot number and the weight of the cheese is charted and kept in the Customer Log folder. When not being used, the Customer Log folder is kept in the sealed tote in the storage room. The packaged cheese is then stored in the cooler to chill overnight before being shipped.



## Mary's Notes

*By disciplining yourself to follow through on this step, you will greatly simplify your billing and improve communication with your customers. When a customer calls with a question on a shipment of cheese, I can readily track which lot of cheese they received. This obviously simplifies any recall issues or product quality issues.*



## Mary's Notes

*Don't cut corners on shipping. Properly packaged cheese will greatly reduce any possibility of damaged or destroyed cheese and will help to ensure happy customers—and a healthy bank account.*

## Shipping

Cheese is wrapped and taped in freezer paper and then placed inside of paper bag or covered a second time in freezer paper. The product is then placed in a thick cardboard box that is packed with large curl pine shavings and or clean hay, and freezer packs (in hot weather). Typically, an 8 pound wheel of aged cheese will require two one pound freezer packs.

All cheese is shipped by 2nd day air if the temperature upon departure is over 60°F, or if the temperature of the destination point is over 60°F.

All freezer packs are first wrapped in white butcher paper before being placed in packaging material.

All packages are transported to a UPS Authorized Shipping Station since LoveTree currently does not have an area that is separated from the cooler for the courier to retrieve packages from.

To prevent possible contamination of product storage area (from courier) transporting packages to a Designated Shipper is now necessary.

## Rodent and insect control

Rodent control for premises:

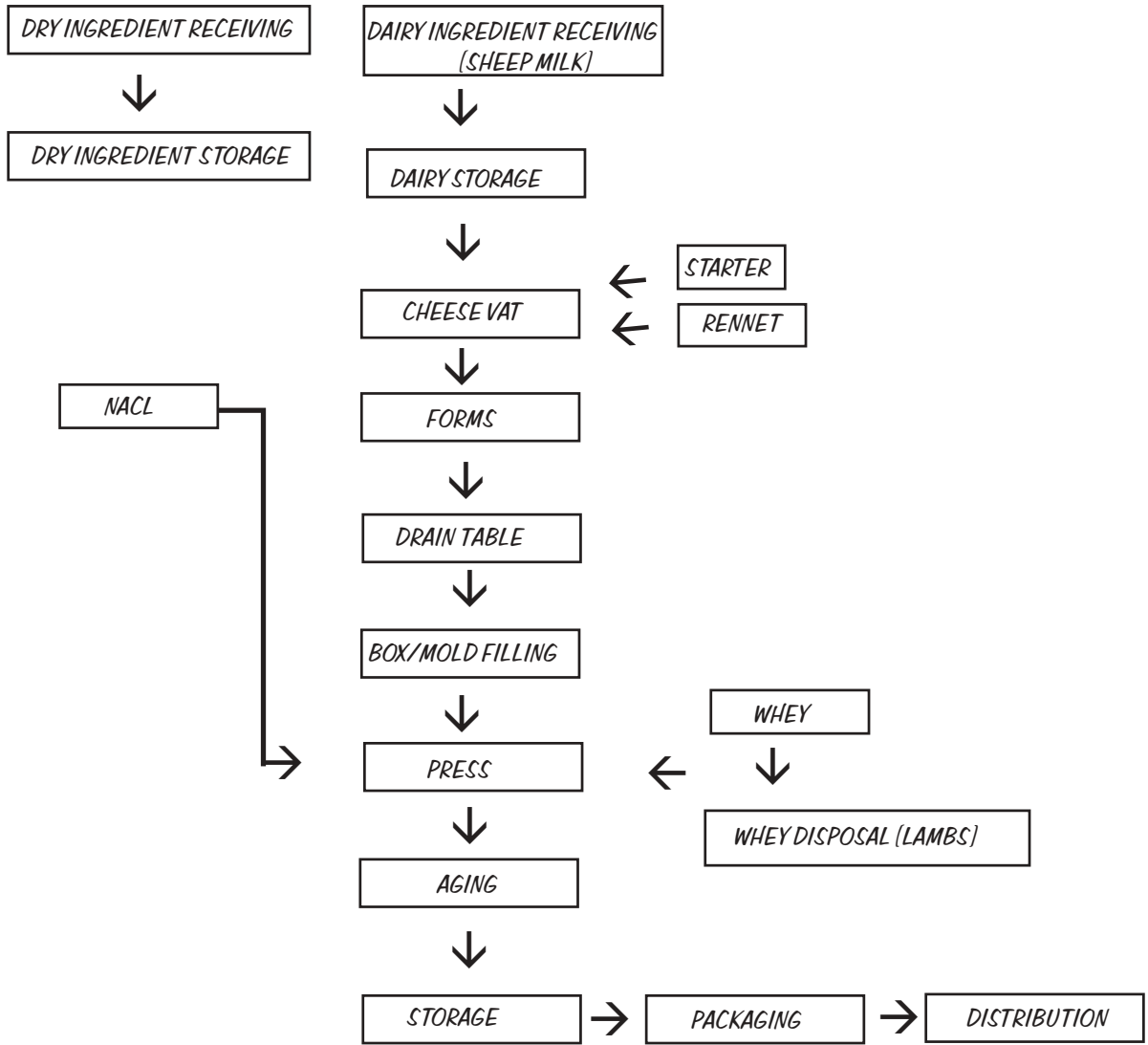
Ferrets are used in the outside perimeter (non cheese make and non cheese aging and storage facility)

In ferret absentia, bar bait is placed in the outside perimeter in bait stations.

All open air vents are screened for insects and also screened with hardware cloth for rodents.

The walls of the milk house and cheese room are washed with Shaklees Basic H for fly control, and selective "swatting" is also used.

# Mary's flow diagram for HACCP



# LoveTree's HACCP for Trade Lake Cedar Production

## Milk Receiving

Microbiological/Pathogens	Proper temperature is monitored to prevent bacterial growth /staph toxins	CCP
Chemical -Animal Drug Residue	Each vat of milk is screened for PLC and SSC	
Physical-any physical hazards	Milk is screened for presence of drug residues Prerequisite Program in place to prevent contamination	

## Milk Storage

Micro/Pathogens	Temp control is necessary to prevent bacterial growth in fluid milk/staph toxins	CCP
Chemical -any hazardous chemical	Prerequisite Program in place to prevent contamination	
Physical-any physical hazards	Prerequisite Program in place to prevent contamination	

## Dry Ingredient Receiving

Micro/Pathogens	Prerequisite Program in place for ingredient receiving and storage
Chemical -any hazardous chemical	Prerequisite Program in place to prevent contamination
Physical-any physical hazards	Prerequisite Program in place to prevent contamination

## Dry Ingredient Storage

Micro/Pathogens	Prerequisite Program in place for ingredient receiving and storage
Chemical -any hazardous chemical	Prerequisite Program in place to prevent contamination
Physical-any physical hazards	Prerequisite Program in place to prevent contamination

## Cheese Vat

Micro/Pathogens	Milk is heated to ripening temperature quickly to prevent pathogen growth. Starter is added as soon as milk is at ripening temperature
Chemical -any hazardous chemical	Prerequisite Program in place to prevent contamination
Physical-any physical hazards	Prerequisite Program in place to prevent contamination

## Starter

Micro/Pathogens	Prerequisite Program in place for ingredient receiving and storage
Chemical-any hazardous chemical	Prerequisite Program in place for ingredient receiving and storage
Physical-any physical hazard	Prerequisite Program in place for ingredient receiving and storage

## Rennet

Micro/Pathogen	Prerequisite Program in place for receiving and storage
Chemical- any hazardous chemical	Prerequisite Program in place for receiving and storage
Physical- Any physical hazard	Prerequisite Program in place for receiving and storage

<b>Water</b>		
Micro/Pathogen	Prerequisite Program in place to prevent unwanted microbial/pathogen growth	
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<b>Forms</b>		
Micro/Pathogen	Pre Requisite Program in place to prevent unwanted microbial/pathogen growth	
Chemical/Any hazardous chemical	Pre Requisite Program in place to prevent contamination	
Physical/ Any physical hazard	Pre Requisite Program in place to prevent contamination	
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<b>Drain Table</b>		
Micro/Pathogens	Prerequisite Program in place to prevent contamination.	
	Ph monitoring to check for proper acid development before salting	CCP
Chemical/Any hazardous chemical	Prerequisite Program in place to prevent contamination	
Physical/Any physical hazard	Prerequisite Program in place to prevent contamination	
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<b>NACI</b>		
Micro/Pathogen	Prerequisite Program in place for ingredient receiving and storage	
Chemical/Any Chemical Hazards	Prerequisite Program in place for ingredient receiving and storage	
Physical /Any Physical Hazards	Prerequisite Program in place for ingredient receiving and storage	
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<b>Aging</b>		
Micro/Pathogen	Prerequisite Program in place to ensure proper aging temperature and time	
Cedar Boughs	Prerequisite Program in place to prevent contamination	
Chemical/Any Chemical Hazards	Prerequisite Program in place for proper cheese storage	
Physical/ Any Physical Hazards		
Insect /rodent control	Prerequisite Program in place for prevention of insect and rodent contamination/damage	
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<b>Packaging</b>		
Micro/Pathogen	Prerequisite Program in place for purchasing packaging supplies	
	Prerequisite Program in place to track product	
Chemical/Any Chemical Hazards	Prerequisite Program in place for receiving and storage of packaging supplies	
Physical/ Any Physical Hazards	Prerequisite Program in place for receiving and storage of packaging supplies	
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<b>Storage</b>	Properly packaged product contains no hazards	
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<b>Distribution</b>	Properly packaged product contains no hazards	
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# **Appendix A Prerequisite Program Evaluation**

# Prerequisite Program Evaluation

Prerequisite Program Items	Evaluation				Comments
	N/A	OK	Needs Work	Yikes!	
Section 1 Premises Control Program					
Written program in place for appropriate elements of this section. Areas/tasks, person responsible, inspection frequencies, records					
Outside premises Land, roadways, drainage, prevention of food contamination					
Building Permit cleaning, prevent pest entrance/harborage, sound construction, well-maintained, adequate space, reflect approved blueprints (if applicable)					
Design and construction Approved materials, floors well sloped and drained, walls light colored and well joined, cleanable ceilings, proper screening on windows, doors tight fitting, overhead structures do not hamper cleaning, lighting adequate and protected, proper ventilation and air flow, appropriate waste removal					
Flow/cross contamination Good product flow, adequate separation of incompatible operations, adequate space					
Employee facilities Washrooms with self-closing doors, facilities should not lead directly into processing rooms, ventilated and maintained.					
Handwashing and sanitizing facilities Hot/cold water, soap, hand drying facilities, cleanable waste receptacles, hand dips where necessary					
Equipment cleaning and sanitizing facilities Adequate facilities for cleaning equipment, equipment for inedible materials housed in a separate facility					
Water quality program Specifications meet drinking water quality standards					

# Prerequisite Program Evaluation

Prerequisite Program Items Section 1, continued	Evaluation				Comments
	N/A	OK	Needs Work	Yikes!	
<p><b>Water supply</b> Adequate quantities, pressures and temperatures of potable water for operations and clean-up, protected against contamination, adequate bacteriological testing, chlorination controls, not cross-connections between potable and non-potable water, backflow preventers where necessary, approved treatment chemicals, acceptable recirculation systems</p>					
<p><b>Ice supply</b> Made from potable water, manufactured, handled and stored properly, routinely tested</p>					
<p><b>Steam supply</b> Generated from potable water if any contact with food, no harmful substances used</p>					

# Prerequisite Program Evaluation

Prerequisite Program Items Section 2 Receiving/Storage	Evaluation				Comments
	N/A	OK	Needs Work	Yikes!	
Raw materials Ingredients and packing materials should be inspected when received, then stored and handled to prevent contamination, they should be certified when necessary, and not received into the processing area					
Specifications Food grade, safe, approved, records should be kept					
Storage Adequate control, keep records of temperature and humidity, handled to prevent damage and contamination					
Non-food chemicals Label and store properly, dispense and handle in an approved way					

# Prerequisite Program Evaluation

Prerequisite Program Items Section 3 Equipment performance and maintenance programs	Evaluation				Comments
	N/A	OK	Needs Work	Yikes!	
<p>General equipment design Should be designed and maintained to prevent contamination and resist corrosion. Food contact surfaces should be non absorbent, non-toxic, smooth and free from pittings. Are they unaffected by food, equipment, chemicals, lubricants? Coatings and paints should be approved.</p>					
<p>Equipment installation Make sure there is adequate space, proper ventilation. No dual use, equipment should not be shared between edible and inedible substances.</p>					
<p>Equipment calibration List food safety related equipment and monitoring devices, protocols and calibration methods, frequency, person monitoring, verification, corrective actions, record keeping, reagent controls.</p>					
<p>Preventative maintenance Do you have a written program for safety related equipment that specifies servicing, frequency, responsible person, monitoring, verification and record keeping?</p>					

# Prerequisite Program Evaluation

Prerequisite Program Items Section 4 Personnel Training Program	Evaluation				Comments
	N/A	OK	Needs Work	Yikes!	
Program Program needs identified, program implemented and verified effective					
Manufacturing controls Every food handler is trained and understands responsibility for monitoring critical elements and taking action.					
Hygienic practices Ongoing training that covers personal hygiene and hygienic food handling. No food handling by personnel with communicable diseases, open wounds, unsanitary clothing, exposed jewelry, uncovered hair. Wash your hands before entering production area. Food and tobacco used only in appropriate areas. Foot and hand dips when required.					
Controlled access Visitor and personnel traffic control					

# Prerequisite Program Evaluation

Prerequisite Program Items Section 5 Sanitation program	Evaluation				Comments
	N/A	OK	Needs Work	Yikes!	
<p><b>Program</b> You will need a written program that covers all equipment, utensils and the work environment; walls, floors, ceilings, overhead structures, doors, etc. Equipment should be cleaned at least daily and major equipment should be disassembled.</p>					
<p><b>Sanitation program adequacy</b> You need an approved program that specifies the person responsible, the chemicals you use, frequency and type of procedure.</p>					
<p><b>Sanitation program adherence</b> Record sanitation monitoring, evaluate effectiveness and record deviations and corrective action taken.</p>					
<p><b>Pest control program adequacy</b> Written program specifying person responsible, list of chemical and methods, frequency of monitoring and pest survey and control reports.</p>					
<p><b>Pest control adherence</b> Monitor and record adherence to written program. Verify and record effectiveness, results and action taken.</p>					

# Prerequisite Program Evaluation

Prerequisite Program Items Section 6 Recall program	Evaluation				Comments
	N/A	OK	Needs Work	Yikes!	
Written recall includes: 1. Product coding system					
2. Distribution records for period exceeding shelf life					
3. Health and safety complaint files					
4. Roles and responsibilities of recall team					
5. Step by step procedures to follow that describe the extent of recall					
6. List how you will contact the affected customers					
7. Control measures for returned product					
8. How will you assess the progress and efficacy of the recall?					
Recall initiation (Minimum information needed for regulatory agencies) 1. Reason for recall 2. Recalled product identification 3. Quantities distributed and remaining 4. Areas of distribution 5. Information about any other affected product					