Food Safety Performance through HACCP; Regrets & Opportunities

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Objective – HACCP Then and Now

To provide historical perspective of the development and effectiveness of HACCP systems. To introduce the change platform and make suggestions for the future utilization of the HACCP system.

Three Questions to the Experts

- What role do you think HACCP has played in making the food supply safer, and is that quantifiable?
- If you could go back to the early 90’s and change how HACCP was implemented, what are three things you would do differently?
- In your career in implementing HACCP, do you have any regrets?

Historical Timeline

1971 Pillsbury, Natick and NASA introduce concept
1992 NACMCF
1992-1994 USDA & CFIA mandate HACCP
1997 Codex Guidelines
2000 GFSI
2012 – FSMA
Next 10 Years?

Seven Principles of HACCP

1. Conduct a hazard analysis
2. Determine the Critical Control Points (CCPs)
3. Establish critical limit(s)
4. Establish a system to monitor control of the CCPs
5. Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control
6. Establish procedures for verification to confirm that the HACCP system is working effectively
7. Establish documentation concerning all procedures and records appropriate to these principles and their application

Management Commitment not a Principle?
Codex Guidelines, 1997

Opening paragraph:

“Prior to application of HACCP to any sector of the food chain, that sector should be operating according to the Codex General Principles of Food Hygiene, the appropriate Codex Codes of Practice, and appropriate food safety legislation. Management commitment is necessary for implementation of an effective HACCP system.”

Regulatory Conundrum

“...regulatory agency is looking for uniformity throughout its system, and frontline inspectors who move from one plant to another do not readily understand the underlying principles of HACCP...”

Dr. Russell Cross, 2013

“If HACCP remains solely a hazards identification system, the food safety benefits will be lost and the system will degenerate into a “command and control” regulatory program”.

Dr. Bruce Tompkin, 2013

HACCP Plan Complexity

“Simplicity is the ultimate sophistication”

Steve Jobs, 2011

Need for Continuous Improvement

BRC 2012

HACCP was the leading clause for non-conformances

MLF 2012

HACCP was the 4th leading cause for non-conformances

This represents a platform for change...

Change Platform - Systems

<table>
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<th>BRC Audits with a HACCP NC (%)</th>
<th>Total # HACCP NC’s</th>
<th>Avg. HACCP NC’s per site where HACCP NC’s occur</th>
<th>Sites with 2 or more occurrences (%)</th>
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<td>1.5</td>
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</tr>
</tbody>
</table>

BRC Audit Findings by Sub-Clause (2012 total NCs across North America)
Cause of Outbreaks

“...most outbreaks or incidents are related to prerequisite programme (PRP) and management failures rather than failures in HACCP.”

Carol Ann Wallace, 2013

Culture Conundrum

“HACCP is an expert system and not all companies necessarily have experts in the plants.”

Dane Bernard, 2013

Food Safety Maturity Model

Food Safety Maturity Model

“Doubtful” “Aware” “Knowing” “Internalized”

Who Messed Up? How much time will it take? Just fix one problem at a time. “What does the data tell us?” “How does this fit in to long term plans?”

Jespersen, 2012

Case Study - Senior Management Commitment

Senior Management Commitment

“The 8:30 Call”

Call to Action

Action Industry must commit to continuous improvement of food safety plans.

Action Industry, academia and government must re-commit to providing in-depth, practical HACCP knowledge

Action Industry must embrace the requirement for senior management commitment.
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Thank You!

Questions?