



When is a HACCP Plan or Variance Required?



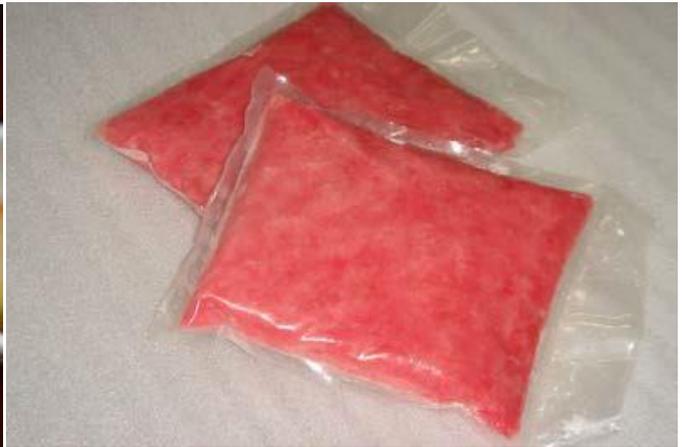
Curing (sausages)



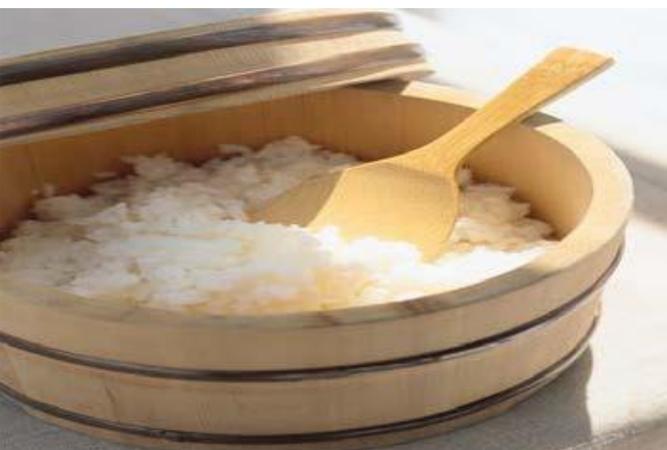
Salt Curing



Fermenting (Kimchi)



Reduced Oxygen Packaged



Use of additive, such as vinegar, to render sushi rice to not be potentially hazardous



Live shellfish holding tanks



When is a HACCP Plan or Variance Required?

Variances and HACCP plans are required for some types of food or food processing methods. A variance application requires that a HACCP plan be submitted with it. In some instances only a HACCP Plan is required. This handout will help you decide when you need to submit a request for a variance with a HACCP plan. It will also provide circumstances when only a HACCP plan is needed.

What is a Variance?

A variance is a written document issued by the California Department of Public Health - Food and Drug Branch (CDPH-FDB) that authorizes a modification or waiver of one or more requirements of the California Retail Food Code if, in the opinion of CDPH-FDB, a health hazard or nuisance will not result from the modification or waiver.

What is HACCP?

Hazard Analysis Critical Control Point uses a seven step process to develop a formal food safety plan. The HACCP process identifies hazards and aids in the development of food safety control measures. The HACCP Plan helps protect the food you make and serve from biological, chemical, and physical hazards.

What are the seven steps in HACCP?

1. Conduct a food safety hazard analysis.
2. Identify critical control points (CCP's).
3. Establish critical limits for preventative measures.
4. Establish monitoring procedures for control points
5. Establish corrective actions.
6. Establish effective record keeping systems.
7. Establish procedures that verify that the HACCP Plan is working.



HACCP Planning Information

The 2017 California Retail Food Code: <http://www.cdph.ca.gov/services/Documents/fdbRFC.pdf>

2013 FDA Model Food Code Annex 4: Contains HACCP guidelines:

<https://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/UCM374510.pdf>

2013 FDA Model Food Code Annex 6: Contains food processing criteria:

<https://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/UCM374510.pdf>

Managing Food Safety: A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments <https://www.fda.gov/Food/GuidanceRegulation/HACCP/ucm2006811.htm>

Methods that require a SFPDH-EHB HACCP plan:

When a manager of food service establishments uses specialized processing methods listed below, he/she is required to operate under a HACCP plan. The manager must submit a HACCP plan along with the application for review.

- Smoking of food as a method of preservation--but not if smoking is for flavor enhancement.
- Curing of food such as ham, sausages, etc.
- Using food additives to preserve food such as vinegar to render sushi rice so that it is not potentially hazardous.
- Operating molluscan shellfish tanks that store/display shellfish that are offered for human consumption, built/installed after July 1, 2007.
- Custom Processing of animals in a food establishment for personal use.
- Sprouting of seeds or beans
- Preparing, serving or transporting food by another method that is determined by the department to require a variance or HACCP plan.

Processes that require a CDPH-FDB approved HACCP plan but not a variance:

- Pooling of eggs in a food establishment that serves a highly susceptible population (nursing home, hospital, day care.)
- Using acidification, or water activity, to prevent the growth of *Clostridium botulinum*.

Processes requiring a HACCP Plan and a Variance approved by CDPH-FDB:

- When cooking food to a lower temperature than specified in the California Retail Food Code, such as with sous vide cooking.



Required Contents of a HACCP PLAN

1. A food employee and supervisory training plan that addresses the food safety issues of concern.
2. A flow diagram by specific food or category type identifying critical control point and providing information on the following:
 - a. ingredients, materials, and equipment used in the preparation of a food; and
 - b. formulations or recipes that delineate methods and procedural control measures that address the food safety concerns involved;
3. A statement of standard operating procedures for the plan under consideration - including clearly identifying:
 - a. each critical control point;
 - b. the critical limits for each critical control point;
 - c. the method and frequency for monitoring and controlling each critical control point by the food employee designated by the person-in-charge;
 - d. the method and frequency for the person in charge to routinely verify that the food employee is following standard operating procedures and monitoring critical control points;
 - e. action to be taken by the person in charge if the critical limits for each critical control point are not met; and
 - f. records to be maintained by the person in charge to demonstrate that the HACCP plan is properly operated and managed; and
 - g. additional scientific data or other information, if required, to support the determination that food safety is not compromised by the proposal.