



HACCP Tracker May 2010

New (May 10) Format	Corresponding Feb 08 Section	Corresponding Packaging SQE	Additions to May 10	Deleted/moved from Feb 08
INTRODUCTION		7.8.1	This document does apply to External Manufacturers. New Chapter for Packaging Suppliers introduced (Chapter 6 and Appendix F)	
CHAPTER 1 – PREREQUISITE PROGRAMS		7.8.2	No changes	
CHAPTER 2 HAZARD ANALYSIS AND RISK ASSESSMENT		7.8.3, 7.8.4	No changes	
CHAPTER 3 STANDARD FOR HAZARDS THAT MAY BE MANAGED BY CCPs		7.8.5	Rewording, formatting, updates to reflect our internal HACCP Standard (mainly in Allergen Section)	
3.1.1 - CCPs for biological hazards	3.1.3 - Certificate of Analyses			Certificate of Analysis was removed from this Chapter.
3.1.1 - CCPs for biological hazards	3.1.7 - Drying		Added: "If the formulation is close to a critical limit, the addition of ingredients may be a CCP and water activity measurement a verification of that activity"	
Definitions	Definitions		Rewording and formatting <ul style="list-style-type: none"> • Primary Barrier reworded to Primary Control Mechanism. • Secondary Barrier reworded to Secondary Control Mechanism • Remarks on Refrigeration moved from Primary and Secondary Control Mechanisms to Refrigeration definition 	
3.2.2- Criteria for Allergen List	3.2.7 and 3.2.8- Criteria for Allergen List		Added: <ul style="list-style-type: none"> • "Food Allergic Reaction is proven to be through an IgE-mediated mechanism • Confirmed by Double Blind Placebo Controlled Food Challenge Studies • Prevalence rate in the range of Food Allergens as defined by Codex Alimentarius (1996, Report of the FAO technical consultation of food allergies), • Documented cases severe and/or life threatening reactions in credible scientific and/or medical publications, • High potency (low levels documented in credible scientific and/or medical publications) to provoke severe reactions, • Other factors: High prevalence of severe and/or life threatening cross-reactivity documented in credible scientific and/or medical publications to provoke severe reactions to substances residing in the Kraft Foods Food Allergen Category List. " 	"For further information contact your Kraft Foods contracting representative" (moved to 3.2.3).



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3.2.3- Use of the list: Appendix C	3.2.9 - Use of the list: Appendix C		<p>Added: "In addition to the Kraft Foods Global Food Allergen Category List, the supplier/EM has to consider the following:</p> <ul style="list-style-type: none"> • A number of countries or geo-political regions have enacted regulatory requirements for the label declaration of specified foods deemed to be food allergens. The local regulatory requirements of the country of manufacture and distribution of Kraft Foods products must be strictly followed. When ingredients that are not included in or exempted from the Kraft Foods Food Allergen Category List are utilized in products commercialized in countries and/or regions that have defined regulatory requirements for their labeling, these ingredients must be appropriately identified to meet the applicable labeling requirements • Kraft Foods maintains a list of food allergens associated with documented regional occurrence of allergic reactions or local regulatory allergen control expectations. These allergens are listed in Appendix C of this document" 	
3.2.3- Use of the list: Appendix C	3.2.9 - Use of the list: Appendix C		<p>Added: "Sulfiting ingredients such as sodium metabisulfite have historically been associated with food allergens. However, these ingredients are not food allergens and generally have regulatory requirements to be included in an ingredient line when the product contains greater than 10 ppm of added sulfites. Additionally, efforts must be taken in the manufacturing setting to ensure that products containing greater than 10 ppm added sulfites do not cause other products produced in the same facility or on shared equipment to exceed the 10 ppm labeling requirement."</p>	
3.2.4 - CCPs and PPs for allergens	3.2.10 - CCPs and PPs for allergens		<p>Added:</p> <ul style="list-style-type: none"> • " Labeling: Undeclared allergens/sulfites can result from applying the wrong label on the finished product due to similar label appearance therefore, documentation would be required to assure that the product packaging/labeling is correct for the formula being produced. • Packaging Line Changeover: Removal of labeled packaging material from packaging equipment and the immediate production area and thorough inspection of equipment (prior to running a product containing an allergen) to prevent potential for a product containing an allergen to be packed in a package not labeled for that allergen " 	



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3.3.2 - Management as a PP or CCP	3.3.4 - Management as a CCP		Added: • " The PP for glass packaging is the clean-up of glass (following a breakage incident), post filling (or after the glass cleaner/inverter), prior to package capping, if a detection/removal device for glass is not on the line. The inspection of the cleaning process must be documented. In addition, glass filling lines must have covered conveyors over exposed open jars after the jar cleaner/inverter (prior to filling and capping) to minimize potential for extraneous glass falling into an open jar.	Removed: • " The CCP or PP for glass packaging is the clean-up of glass (following a breakage incident), post filling (or after the glass cleaner/inverter), prior to package capping, if a detection/removal device for glass is not on the line. The inspection of the cleaning process must be documented. In addition, glass filling lines must have covered conveyors over exposed open jars after the jar cleaner/inverter (prior to filling and capping) to minimize potential for extraneous glass falling into an open jar"
CHAPTER 4 - HACCP PLAN DOCUMENTATION COMPONENTS		7.8.3	Rewording, formatting and update the forms (according to our internal HACCP Standard)	
4.3.1 - Ingredient/Packaging Assessment (Form C)	4.4 - Hazard Analysis (From C-F)		Added: "Describe the rationale behind the decision for each hazard, and determine the control mechanism(s). "	"Do not leave any section blank" (moved to Appendix D)
4.3.2 -Processing Step Evaluation (Form D)	4.3.2 -Processing Step Evaluation (Form D)		Added: "Describe the rationale behind the decision for each hazard, and determine the control mechanism(s). "	Example table was removed (Examples are on Appendix D)
4.4 - CCP Documentation (Form G)	4.5 - CCP Documentation (Form G)			CCP examples were removed (Examples are on Appendix E)
4.6- Plant Layout (Form J)	4.7- Plant Layout (Form J)			Prerequisite Programs examples were removed (Examples are on Appendix D)
CHAPTER 5 - HACCP SYSTEM VERIFICATION AND VALIDATION PROCEDURES		7.8.7	Rewording, formatting and update the forms (according to our internal HACCP Standard)	
5.2 - HACCP Plan Validation	5.3 - HACCP Plan Validation (or revalidation)		Added: "Validation of the HACCP Plan implies determining if the Critical Control Points and associated critical limits as well as the Prerequisite Programs and their control mechanisms are adequate and sufficient to actually prevent, eliminate or reduce to an acceptable level identified microbiological, chemical and/or physical food hazards. The questions we want to answer are: • Is the HACCP Plan well founded? • Are all hazards introduced by the raw materials or the processes identified in the HACCP Plan? • Are the controls sufficient to manage the given hazards ? • Is this the right thing to do? • Did it work? • Will it work? Validation involves checking the effectiveness and aims to continuously improve the HACCP System (see Appendix A)."	



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5.2 - HACCP Plan Validation	5.3 - HACCP Plan Validation (or revalidation)		Added: "Notes: • If a non significant change is made, this can be incorporated directly into the current HACCP plan • It should be noted that whenever there are changes to product, package or process, as appropriate, the HACCP Team should be convened to review the effect on the existing HACCP plan. The review during validation is intended only to verify that all changes made since the last validation are reflected in the Hazard Analysis and, as needed, in the HACCP plan itself"	
5.2.1 - When to validate a HACCP Plan	5.3.1 - When to validate a HACCP Plan		Added: "Frequency every two years and: • In case of Major changes to product, ingredients, process/processing equipment, packaging or storage/distribution conditions • In case of new hazards being recognized • In case of new scientific information concerning the product/process • In case of unexplained system failure/when deviations occur • In case of consumer complaints or product rejections • Whenever there is a systematic or reoccurring product safety issue or industry recall of a similar product, a validation would be performed using the Validation Checklist or equivalent • For new HACCP Plans or brand new product categories after 6 months the Validation Team shall decide whether a HACCP Plan Implementation Validation is required"	5.3.2, 5.3.3, 5.3.4, 5.3.5, 5.3.6, 5.3.7 from SQE Feb 08 removed (as current HACCP Review Checklist is more comprehensive)
5.3- Process and Equipment Validation	New item		New item. Added: "A process and equipment validation study of processing equipment that is used for CCP control shall be carried out: • before the equipment is first used in production • at the time of any changes to the equipment/product which could potentially impact the lethality of the process, • if the level of the hazard is higher than originally encountered (e.g. new scientific literature), • If information indicates that the hazard is not being controlled to the level specified. Note: For some specific processes where Kraft Foods has developed Process Guidelines (e.g. Nut, Cocoa, Dairy, Egg, Juice, Meet Products), the frequency of the process/equipment validation shall be in accordance with the Guidelines"	
CHAPTER 6 - PACKAGING EXPECTATIONS		7.8.5		
6.1.2 - Potential Chemical Risks	7.8.5 - Chemical			



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APPENDIX				
Appendix A - HACCP Review Checklist	Appendix A: HACCP Plan Validation Checklist	Appendix B - HACCP Plan Validation Checklist	Update List (according to Kraft foods internal HACCP Standard)	Appendix A - HACCP Review Checklist
Appendix B- Biologically Sensitive ingredient Category List	Appendix B- Biologically Sensitive ingredient Category List	NA	Update List and exemptions (according to Kraft Foods internal HACCP Standard) • Updating requirements for Water Management	Appendix B- Biologically Sensitive ingredient Category List
Appendix C- Food Allergen Category List	Appendix C- Food Allergen Category List		Update List and exemptions (according to Kraft Foods internal HACCP Standard) • Inclusion of Regional Allergens (only for EU, CEEMA and LA)	Appendix C- Food Allergen Category List
Appendix D- HACCP Plan Documentation Forms and Examples	Appendix D- HACCP Documentation Forms and Examples	Appendix C- HACCP Plan Documentation Forms	Update Forms A-K (according to Kraft foods internal HACCP Standard)	
Appendix E- Model Critical Control Points and Prerequisite Programs	Appendix E- Model Critical Control Points		<ul style="list-style-type: none"> • Models were updated according to our internal Kraft Foods HACCP Standard • "Sensitive Ingredient Post Lethal Process Addition" moved from CCP to PP • CCP Model "Product Flushing for Allergen Removal" added • PP Model "Glass Breakage" added 	<ul style="list-style-type: none"> • "HACCP Plan Verification Activities" were removed from the CCP Models • "Water Activity" Model was removed
Appendix F- Packaging Models PCCP and PP		Appendix D - CCP Models	<ul style="list-style-type: none"> • Models were updated according to our internal Kraft Foods HACCP Standard (note that Kraft Foods does not have an internal CCP Model for all models listed in this Appendix) 	