



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY | FOOD AND HOUSING DIVISION

P.O. BOX 129261, SAN DIEGO, CA 92112-9261

Phone: (858) 505-6900 | Fax: (858) 999-8920 www.sdcdehq.org



Hazard Analysis Critical Control Point (HACCP) Plan Submittal Checklist for Specialized Processes Subject to State Regulation

Food Acidification

Water Activity Reduction

Reduced Oxygen Packaging

A Hazard Analysis Critical Control Point (HACCP) plan is a written document that defines the formal procedures for following HACCP principles to identify and prevent hazards that could cause foodborne illnesses. Food facilities that plan on conducting specialized food processes are required to complete a HACCP plan and submit it for review and approval. Facilities must operate in accordance with their approved HACCP plan. Failure to follow the approved plan may result in enforcement action.

This checklist is intended to be a guide for facilities conducting specialized food processes that require an approval from the California Department of Public Health (CDPH) for a HACCP plan or a Canning License. Be advised that additional documentation or information may be required by CDPH when reviewing your HACCP plan. If you are conducting more than one process (such as sous vide, vacuum packing, and cook/chill), a plan must be submitted for each process.

- **Acidification** to prevent the growth of *Clostridium botulinum* requires submittal of a processed food registration application and product for testing to CDPH. A Cannery License may additionally be required.
- **Reduced Oxygen Packaging (ROP)** of potentially hazardous foods, including sous vide, foods not immediately cooked and food prepared by cook/chill methods, requires a HACCP plan approved by CDPH. See below for HACCP plan requirements.

I) Section 114419.1 of the California Retail Food Code states that a HACCP plan must include the following items:

	Item	Description of information required
<input type="checkbox"/>	Hazard Analysis	Evaluate your process and identify all potential hazards for foodborne illness. Hazards should be identified for each step of the process including: ▪ Receiving ▪ Storing ▪ Preparation ▪ Holding ▪ Serving
<input type="checkbox"/>	Critical Control Points (CCP)	CCP are any biological, chemical or physical hazards that can contaminate Potentially Hazardous Foods (PHF) during the process. Identify how to control for the hazards (Critical Control Points-) starting with the point where the PHF enters the facility to the point of sale (e.g. receiving, storage, preparation, display and dispensing).
<input type="checkbox"/>	CCP Limits	Identify measurable limits for each control point in your process. (ROP limits vary based on the process. Refer to the FDA Model Food Code 3-502.12 for requirements)
<input type="checkbox"/>	Monitoring Records	▪ Monitoring records specific to sous vide, cook chill, and ROP. ▪ Record keeping; must maintain for at least 90 days. ▪ Logs for receiving, storing and discarding food, calibrations, corrective actions, training records, etc.
<input type="checkbox"/>	Process Flow Diagram	For the specific food for which the plan is requested. Plan must include identified critical control points ; ingredients, materials and equipment used; and recipes that identify methods and procedural control measures.
<input type="checkbox"/>	Standard Operating Procedures	To include: ▪ Sanitation- cleaning ▪ Equipment maintenance ▪ Thermometer calibration ▪ Method and frequency used to monitor and control each CCP
<input type="checkbox"/>	Training Plan	To include these elements: Hygiene, no bare hand contact, an employee trained in HACCP, one employee trained in use of vacuum packing machine and other equipment used for your processes.
<input type="checkbox"/>	Additional Data	Scientific evidence or additional documentation may be required by CDPH.

"Environmental and public health through leadership, partnership and science"

Hazard Analysis Critical Control Point (HACCP) Plan

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II) Section 114057.1 of the California Retail Food Code states that a facility using an ROP method must also include the following items in their HACCP Plan in addition to section 114419.1 listed on page 1:

	Item	Description of information required
<input type="checkbox"/>	List of foods	<ul style="list-style-type: none"> ■ A list of foods that will be packaged using ROP. ■ A separate list or plan must be provided for each ROP process you conduct.
<input type="checkbox"/>	Temperature Control	<ul style="list-style-type: none"> ■ A description of how the ROP food will be held at its required temperature. <p>The required temperatures (hot and cold) may vary based on the process. Refer to the FDA Model Food Code 3-502.12 for required temperatures.</p>
<input type="checkbox"/>	Prevention of <i>Clostridium botulinum</i> & <i>Listeria monocytogenes</i>	<ul style="list-style-type: none"> ■ A list of limiting factors that will prevent the growth and toxin formation of <i>Clostridium botulinum</i> and the growth of <i>Listeria monocytogenes</i>. <p>Examples of these limiting factors include:</p> <ul style="list-style-type: none"> ■ A water activity (Aw) of 0.91 or less. ■ A pH of 4.6 or less. ■ Food is raw meat, poultry or vegetables. ■ FRESH or THAWED fish cannot be used in an ROP process. Fish must be frozen before, during and after the ROP process. ■ The food is meat/poultry cured at an approved USDA plant and received in the intact packaging. Evidence of the USDA certification must be submitted with your plan.
<input type="checkbox"/>	Labeling Method	<p>Retail sale of ROP products must include the following information on the label in bold type on a contrasting background:</p> <ul style="list-style-type: none"> ■ Maintain product at 41°F or below. ■ Use by date of no more than 30 days from the date of packaging. ■ Freeze, discard, or consume the product by the use by date or within 30 day of packaging date. Date label does not apply to frozen ROP products. <p>ROP food that will be consumed at the food facility must be labeled to ensure that the food is used, discarded or frozen within 30 days from date of packaging.</p>
<input type="checkbox"/>	Standard Operating Procedures	<p>Standard operational procedures must include:</p> <ul style="list-style-type: none"> ■ A designated ROP work area and staff that will be allowed in that area. ■ Measures to prevent cross-contamination between raw and ready-to-eat PHF before and during the ROP process. ■ Sanitizing procedures for food contact surfaces and ROP equipment. ■ Prohibition of bare hand contact with food packaged using an ROP process. ■ Procedures to ensure first-in, first-out practices for food packaged using an ROP process.

**To begin the HACCP review process you must submit the
[Retail Food Program Service Request Application](#) with your HACCP plan.**

Contact the Southern California CDPH representative, **Susan Leaverton**, at susan.leaverton@CDPH.ca.gov, to obtain HACCP submittal instructions or for further clarification of CDPH requirements. Once a HACCP plan is approved by CDPH, any changes or modifications will require the HACCP plan to be resubmitted for approval.