

CB HACCP Smart Engine: Lead Auditor Tips & Tricks

Version: 1.5.0

Publisher: CONSULTING UA-RO LIMITED LIABILITY COMPANY

1. Avoiding Generic PRPs (Prerequisite Programs)

The Trap:

Listing a generic term like "Sanitation" as the control measure for biological hazards at every single process step. This is the #1 reason for audit non-conformities.

The Solution:

Use the Smart Engine to input

Specific Preventive Controls

. Instead of "Cleaning," input:

"Validated 15-minute caustic wash at 80°C (Ref: PRP-04)."

2. Manipulating Likelihood vs. Severity

The Concept:

You cannot alter the

Severity

of a hazard (e.g., Salmonella is always Severe: Score 4 or 5). To prevent a standard process step from escalating into a CCP (which requires expensive continuous monitoring), you must legally reduce the

Likelihood

.

The Strategy:

Use the portal's "Upload Evidence" feature to attach historical lab swabs, supplier guarantees, and signed training logs. Verifiable historical data legally justifies lowering a Likelihood score from a 3 (Possible) to a 1 (Rare), keeping the step classified as a standard PRP.

3. The 3-Part Corrective Action Rule

The Trap:

When a limit is breached, simply writing "Re-clean machine" as the corrective action.

The Solution:

The HACCP Engine requires comprehensive CAPA tracking. Always construct a 3-part response to satisfy the auditor:

Correction:

Hold all product produced since the last acceptable check.

Root Cause:

Identify

why

the failure occurred (e.g., faulty temperature gauge).

Preventive Action:

Recalibrate the gauge and update the weekly maintenance schedule.