I. Table of Contents:

II. Sodexo HACCP Team

Sarah Heckroth – Director Food Safety Programs and Projects (Team lead)
Tim Gregg – Sr. Food Safety Manager
Rick Melendez – Sr. Food Safety Manager
Stacey Willson – Sr. Food Safety Manager
Martin Ethy Ethy – Sr. PQA Manager

The HACCP team meets at a minimum annually to review the company HACCP plan and whenever necessary to address food safety concerns.

III. Product Description and Process Approach - A Practical Application of HACCP at Retail

Within the retail and food service industries, the implementation of HACCP principles varies as much as the products produced. Due to this diversity, implementation of "textbook" HACCP is impractical in most Sodexo food service operations. Like many other quality assurance programs, the principles of HACCP provide a common-sense approach to identifying and controlling risk factors. While a complete HACCP system is ideal, many different types of food safety management systems may be implemented to control risk factors. Sodexo implements as many principles as possible in the Food Safety Management System and takes a process approach to HACCP instead of a product specific approach. When conducting the hazard analysis, food manufacturers usually use food commodities as an organizational tool and follow the flow of one product. This is a very useful approach for producers or processors since they are usually handling one product at a time. By contrast, in retail and food service operations, foods of all types are worked together to produce a final ready to eat product that is intended to be consumed immediately. This makes a different approach to the hazard analysis

necessary. Conducting the hazard analysis by using the food preparation processes common to a specific operation is often more efficient and useful for retail and food service operators. This is called the "Process Approach" to HACCP. The process approach can best be described as dividing the many food flows in an establishment into broad categories based on activities or stages in the flow of food through your establishment, then analyzing the hazards, and placing managerial controls on each grouping.

III. Product Description:

Sodexo retail operations prepare and sell ready to eat meals and components that are intended to be consumed immediately upon purchase. Sodexo's HACCP plan does not included products categorized by the FDA Retail Food Code as specialized processes. Operations that prepare food under specialized processes must create specific HACCP Plans to that type of food preparation. Specialized process HACCP Plans must be reviewed by a member of the Food Safety Team and get prior approval from their local regulatory authority prior to use.

IV. Process Flow Charts:

The flow of food in a retail or food service establishment is the path that food follows from receiving through service or sale to the consumer. Several activities or stages make up the flow of food and are called operational steps. Examples of operational steps include receiving, storing, preparing, cooking, cooling, reheating, holding, assembling, packaging, serving, and selling.

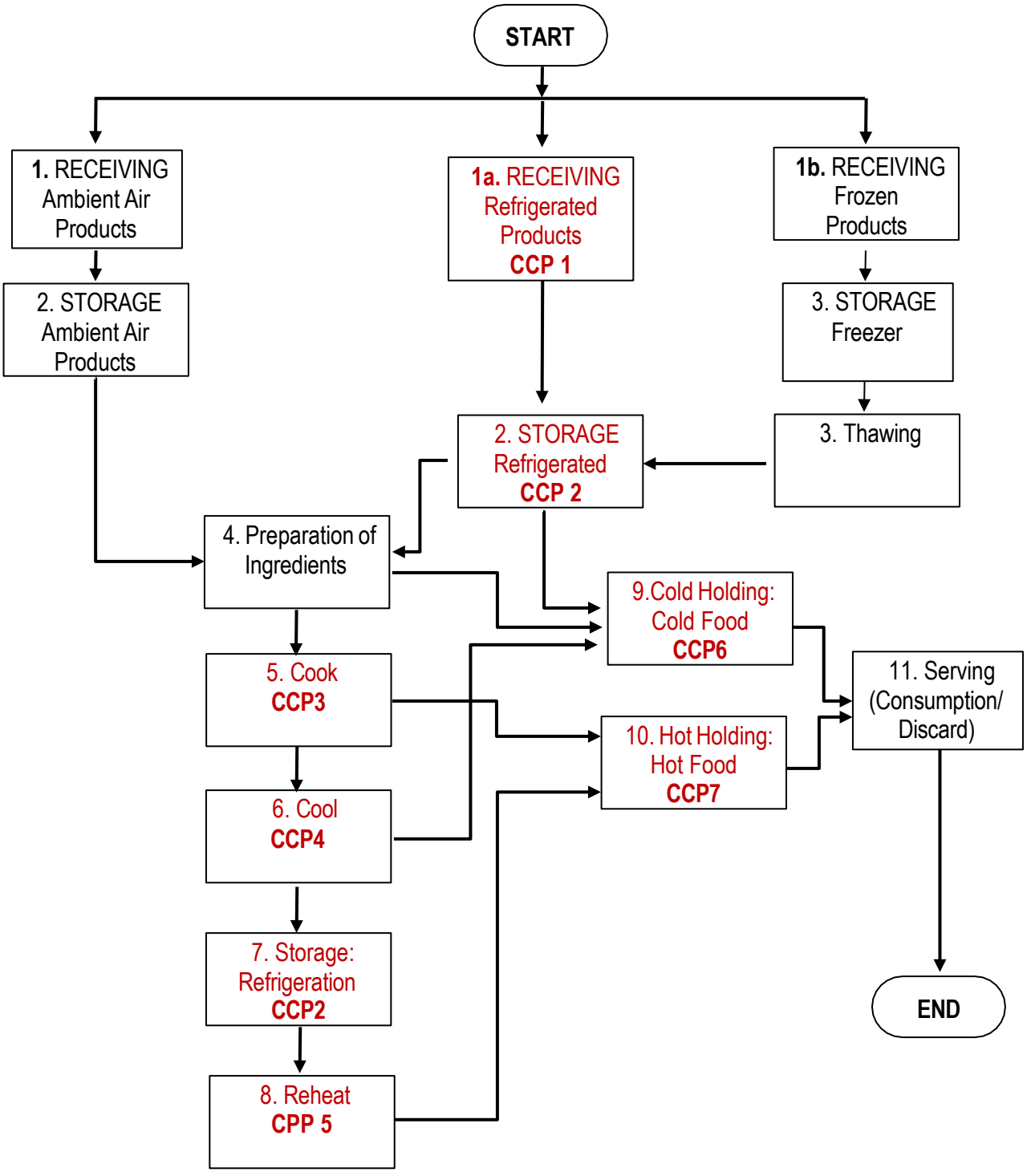
Most food items produced in Sodexo food service establishments can be categorized into one of three preparation processes based on the number of times the food passes through the temperature danger zone between 40^{O}F to 140^{O}F:

Process 1: Food Preparation with No Cook Step - there is no cook step to destroy pathogens:
Receive – Store – Prepare – Cold Hold – Serve

Process 2: Preparation for Same Day Service - there is only one trip through the temperature danger zone
Receive – Store – Prepare – Cook – Hot Hold – Serve

Process 3: Complex Food Preparation – there are always two or more complete trips through the temperature danger zone
Receive – Store – Prepare – Cook – Cool – Reheat – Hot Hold – Serve

IV Process Flow Charts



V. Hazard Analysis

(1) Process Step	(2) Potential Food Safety Hazards Introduced, Controlled, or Enhanced at this Step (**B**: Biological, **C**: Chemical, **P**: Physical)	(3) Reasonably Likely to Occur Yes or No		(4) Justify Your Decision for Column 3	(5) What Control Measure(s) can be Applied to Significantly Minimize or Prevent Food Safety Hazard	(6) Is this a CCP or oPRP
		Yes	No			
1. Receiving: Dry Storage	**B** Presence and growth of pathogenic organisms		X	Risk low: Shelf Stable products have gone through a process that significantly reduce microbial load to an acceptable level.	Control with 1.1.4 Receiving Procedure. Purchase from approved vendor only.	**oPRP**
	C Allergens, Pesticides	X		Risk Medium: Recalls due to undeclared allergens is number one reason for recall product.	Control with 1.1.4 Receiving Procedure. Purchase from approved vendor only.	**oPRP**
	P Foreign Material Hazard		X	Risk Low: Supplier with audited food safety plan have significantly low risk of physical hazard in product.	Control with supplier control procedures. Purchase from approved vendor only.	**oPRP**
1a. Receiving: Refrigerated Storage	**B** Presence and growth of pathogenic organisms	X		Risk High: Raw meat, poultry, seafoods, eggs, and agricultural products are known source of pathogen and growth of these microorganisms could cause spoilage and severe illness.	TCS foods must be receive at 40^{O}F or below.	**CCP 1**
	C Allergens	X		Risk Medium: Recalls due to undeclared allergens is number one reason for recall product.	Control with 1.1.4 Receiving Procedure. Purchase from approved vendor only.	**oPRP**
	P Foreign Material Hazard	X		Risk Medium: Raw agricultural products have naturally occurred rocks/dirt.	Control with 1.1.4 Receiving Procedure. Purchase from approved vendor only.	**oPRP**

(1) Process Step	(2) Potential Food Safety Hazards Introduced, Controlled, or Enhanced at this Step (**B**: Biological, **C**: Chemical, **P**: Physical)	(3) Reasonably Likely to Occur Yes or No		(4) Justify Your Decision for Column 3	(5) What Control Measure(s) can be Applied to Significantly Minimize or Prevent Food Safety Hazard	(6) Is this a CCP or oPRP
		Yes	No			
1b. Receiving: Frozen Products	**B** Presence and growth of pathogenic organisms	X		Risk High: Raw meat, poultry, seafoods, eggs, and agricultural products are known source of pathogen and growth of these microorganisms could cause spoilage and severe illness.	Control with 1.1.4 Receiving Procedure. Purchase from approved vendor only. Reject deliveries that are not solidly frozen or show signs of thawing.	**oPRP**
	C Allergens	X		Risk Medium: Recalls due to undeclared allergens is number one reason for recall product. SOP will control purchase from approved vendors only with audited allergen control plan.	Control with 1.1.4 Receiving Procedure. Purchase from approved vendor only.	**oPRP**
	P Foreign Material Hazards		X	Risk Low: Supplier with audited food safety plan have significantly low risk of physical hazard in product.	Control with 1.1.4 Receiving Procedure. Purchase from approved vendor only.	**oPRP**
2. Storage: Dry Ingredients	**B** Presence and growth of pathogenic organisms		X	Risk low: Shelf Stable products have gone through a process that significantly reduce microbial load to an acceptable level.	Control with 1.1.4 FIFO and proper storage practices	**oPRP**
	C Allergens	X		Risk Medium: Improper storage could lead to allergen cross contact.	Control with 1.1.4 Proper storage practices	**oPRP**
	P Foreign Material Hazards		X	Risk Low: Supplier with audited food safety plan have significantly low risk of physical hazard in product.	Control with 1.1.4 Proper storage practices	**oPRP**

(1) Process Step	(2) Potential Food Safety Hazards Introduced, Controlled, or Enhanced at this Step (**B**: Biological, **C**: Chemical, **P**: Physical)	(3) Reasonably Likely to Occur Yes or No		(4) Justify Your Decision for Column 3	(5) What Control Measure(s) can be Applied to Significantly Minimize or Prevent Food Safety Hazard	(6) Is this a CCP or oPRP
		Yes	No			
2a. Storage: Refrigerated Products	**B**	Presence and growth of pathogenic organisms	X		Risk High: Improper cold storage temperature control could lead to the growth of pathogenic microorganisms.	Maintain refrigerated storage at 40^{O}F or below.	**CCP 2**
	C	Allergens		X	Risk Medium: Improper storage could lead to cross contact with allergens.	Control with 1.1.4 Proper storage practices	**oPRP**
	P	Foreign Material Hazards		X	Risk Low: Covered foods have low risk of foreign material (FM) contamination.	Control with 1.1.4 Proper storage practices	**oPRP**
2b. Storage: Frozen Products	**B**	None		X	Risk Low: Growth of pathogenic microorganisms in freezer conditions is very limited if any.	Control with 1.1.4 Proper storage practices	**oPRP**
	C	Allergens	X		Risk Medium: Improper storage could lead to cross contact with allergens.	Control with 1.1.4 Proper storage practices	**oPRP**
	P	Foreign Material Hazards		X	Risk Low: Frozen foods comes in sealed containers.	Control with 1.1.4 Proper storage practices	**oPRP**
3. Thawing	**B**	Growth of pathogenic microorganisms	X		Risk Medium: All thawing is to be done under refrigeration: Time and temperature relationship will not allow for pathogen growth.	Control with 1.1.4 Thawing procedures	**oPRP**
	C	None		X	None	Control with 1.1.4 Thawing procedures	**oPRP**
	P	None		X	None	Control with 1.1.4 Thawing procedures	**oPRP**

(1) Process Step	(2) Potential Food Safety Hazards Introduced, Controlled, or Enhanced at this Step (**B**: Biological, **C**: Chemical, **P**: Physical)	(3) Reasonably Likely to Occur Yes or No		(4) Justify Your Decision for Column 3	(5) What Control Measure(s) can be Applied to Significantly Minimize or Prevent Food Safety Hazard	(6) Is this a CCP or oPRP
		Yes	No			
4. Preparation of Ingredients	**B** Presence and growth of pathogenic microorganisms	X		Risk Low: Time for preparation is not long enough to cause pathogen growth.	Control with 1.1.4 Personal Hygiene and Cross contamination policy.	**oPRP**
	C Allergens/ Cleaning chemicals	X		Risk Medium: Cross contact could occur if ingredients are not prepared correctly, and chemicals are not stored properly.	Control with 1.1.4 Personal Hygiene and cross contamination policy, chemical storage	**oPRP**
	P Foreign Material Hazards	X		Risk Medium: Food is exposed during preparation. Cross contamination with foreign materials could occur if not prepared correctly.	Control with 1.1.4 Cross contamination	**oPRP**
5. Cook	**B** Presence, survival, and growth of pathogenic microorganisms	X		Risk High: Improper cooking raw animal foods can lead to the survival of pathogenic microorganisms.	Follow established internal cooking temperature	**CCP 3**
	C Allergens		X	Risk Medium: Allergen cross contact can occur during cooking. Cooking does not destroy allergen protein.	Control with 1.1.4 Cross contamination policy.	**oPRP**
	P None		X	Risk Low: Controlled with previous steps and SOP's.	None	None
6. Cooling	**B** Growth of pathogenic microorganisms	X		Risk High: Improper cooling procedure can lead to the growth of pathogen that survived the cooking process.	Food must be cooled quickly from 140^{O}F to 70^{O}F within 2 hours and 70^{O}F to 40^{O}F within 4 hours.	**CCP 4**
	C Allergens		X	Risk Medium: Allergen cross contact could occur if food is not stored protected during cooling.	Control with 1.1.4 Cooling policy, cross contamination, and storage policy.	**oPRP**

(1) Process Step	(2) Potential Food Safety Hazards Introduced, Controlled, or Enhanced at this Step (**B**: Biological, **C**: Chemical, **P**: Physical)		(3) Reasonably Likely to Occur Yes or No		(4) Justify Your Decision for Column 3	(5) What Control Measure(s) can be Applied to Significantly Minimize or Prevent Food Safety Hazard	(6) Is this a CCP or oPRP
			Yes	No			
	P	Foreign Material Hazards		X	Risk Low: Foreign material risk if food is not stored protected during cooling.	Control with 1.1.4 Cross contamination, and Storage policy.	**oPRP**
7. Refrigerator Storage	**B**	Growth of pathogenic bacteria	X		Risk High: Improper cold storage temperature control could lead to the growth of pathogenic micro-organisms.	Maintain refrigerated storage at 40^{O}F or below.	**CCP 2**
	C	Allergens		X	Risk Medium: Improper storage could lead to cross contact with allergens.	Control with 1.1.4 Proper food storage and labeling policies.	**oPRP**
	P	Foreign Material Hazards		X	Risk Low: Covered foods have low risk of foreign material (FM) contamination.	Control with 1.1.4 Proper storage practices	**oPRP**
8. Reheat	**B**	Survival and growth of pathogenic microorganisms	X		Risk High: Pathogen that survived the cooking process could rapidly grow and survive during the reheating process.	Reheat TCS food that will be hot held to 165^{O}F within 2 hours.	**CCP 5**
	C	None		X	Risk Low: Controlled with previous steps and SOP's.	None	**oPRP**
	P	None		X	Risk Low: Controlled with previous steps and SOP's.	None	**oPRP**
9. Cold Holding	**B**	Growth of pathogenic microorganisms	X		Risk High: Improper storage/serving temperature control could lead to the growth of pathogenic micro-organisms.	Cold Holding/ Serve cold TCS foods at 40^{O}F or below.	**CCP 6**
	C	Allergens	X		Risk Medium: Cross contact could occur if SOP's are not followed.	None	**oPRP**
	P	Foreign Material Hazards		X	Risk Low: Controlled with previous steps and SOP's.	None	**oPRP**

(1) Process Step	(2) Potential Food Safety Hazards Introduced, Controlled, or Enhanced at this Step (**B**: Biological, **C**: Chemical, **P**: Physical)	(3) Reasonably Likely to Occur Yes or No		(4) Justify Your Decision for Column 3	(5) What Control Measure(s) can be Applied to Significantly Minimize or Prevent Food Safety Hazard	(6) Is this a CCP or oPRP
		Yes	No			
10. Hot Holding	**B**	Growth of pathogenic microorganisms	X		Risk High: Improper storage/serving temperature control could lead to the growth of pathogenic micro-organisms.	Hot Holding/Serve hot TCS foods at 140^{O}F or above.	**CCP 7**
	C	Allergens	X		Risk Medium: Cross contact could occur if SOP's are not followed.	Control with 1.1.4 Utensil	**oPRP**
	P	Foreign Material Hazards		X	Risk Low: Controlled with previous steps and SOP's.	Control with 1.1.4 Food Safety Policies and procedures.	**oPRP**
11. Serving (Consume/ Discard)	**B**	None		X	Food is consumed/discarded, no opportunity for biological hazards	None	None
	C	None		X	Food is consumed/discarded	None	None
	P	None		X	Food is consumed/discarded	None	None

VI. HACCP Plan

1. Critical Control Point	2. Specific Hazard to be Addressed	3. Critical Limits (CL)	4. Monitoring				5. Corrective Actions	6. Verification	7. Records
			What	How	When	Who			
CCP 1 - Receiving Refrigerated Products	Biological pathogenic micro-organisms	All potential hazardous foods/TCS Foods must be received 40^{O}F and below	TCS Foods at Receiving	Randomly check 1-3 product temperatures with a calibrated thermometer	Every delivery	Assigned Trained Individual	Stop the process/place product on hold and evaluate for safety. If product is above 40^{O}F reject delivery	Direct observation by trained Supervisor or Manager. Records review by trained Supervisor or Manager.	Weekly Food Receiving Log - HACCP 1.1.5.s Thermometer Calibration Log - HACCP 1.1.5.z

1. Critical Control Point	2. Specific Hazard to be Addressed	3. Critical Limits (CL)	4. Monitoring				5. Corrective Actions	6. Verification	7. Records
			What	How	When	Who			
CCP 2 - Storage Cold	Biological pathogenic micro-organisms	All refrigerators must be maintained at 40^{O}F and below	Refrigerator storage	Monitor temperature of the cooler to ensure that refrigerated products stays at 40^{O}F and below. Check the temperature of the storage unit in the warmest part of the cooler	At least once per day	Assigned Trained Individual	Take product temperature. If product is above 40OF, place product on hold and evaluate for safety by using CFP Procedures (Annex 4) for handling refrigerated TCS food during a power outage guideline. Contact food safety manager for additional guidance.	Direct observation by trained Supervisor or Manager. Records review by trained Supervisor or Manager.	Refrigerator Temperature Log (single location) - HACCP 1.1.5.i Refrigerator Temperature Log (multiple locations) - HACCP 1.1.5.j

1. Critical Control Point	2. Specific Hazard to be Addressed	3. Critical Limits (CL)	4. Monitoring				5. Corrective Actions	6. Verification	7. Records
			What	How	When	Who			
CCP 3 - Cooking	Biological pathogenic micro-organisms	Product is cooked to heat all parts of the product to a minimum temperature. Refer to Annex 3 on page 18 - 19 of this document.	Internal Product Temperature	Calibrated thin tipped thermometer	At the end of the cooking process	Cooks or Assigned Trained Individual	Continue the cooking process until correct internal temperature is achieved	Direct observation by trained Supervisor or Manager. Records review by trained Supervisor or Manager.	- Cooking Raw Foods Temperature Log - HACCP 1.1.5.c Thermometer Calibration Log - HACCP 1.1.5.z

1. Critical Control Point	2. Specific Hazard to be Addressed	3. Critical Limits (CL)	4. Monitoring				5. Corrective Actions	6. Verification	7. Records
			What	How	When	Who			
CCP 4 - Cooling	Biological pathogenic micro-organisms	Cool cooked food from 140^{O}F to 70^{O}F within 2 hours and from 70^{O}F to 40^{O}F within additional 4 hours.	Internal Product Temperature	Calibrated thin tipped digital thermometer	At the 2-hour and 4-hour intervals of the cooling process.	Assigned Trained Individual	Discard product if critical limits are exceeded.	Direct observation by trained Supervisor or Manager. Records review by trained Supervisor or Manager	Cooling and Chilling Temperature Log - HACCP 1.1.5.e Thermometer Calibration Log - HACCP 1.1.5.z

1. Critical Control Point	2. Specific Hazard to be Addressed	3. Critical Limits (CL)	4. Monitoring				5. Corrective Actions	6. Verification	7. Records
			What	How	When	Who			
CCP 5 - Reheat	Biological pathogenic micro-organisms	Reheating must reach 165^{O}F within 2 hours.	TCS food for hot holding	Check the temperature of the food at the end of reheating with a calibrated thermometer. Record time reheating process start and stops.	At the end of the reheating process.	Cooks or Assigned Trained Individual	Discard product if critical limit is not met.	Direct observation by trained Supervisor or Manager. Records review by trained Supervisor or Manager	Reheating for Hot Holding Temperature Log - HACCP 1.1.5.h Thermometer Calibration Log - HACCP 1.1.5.z
CCP 6 – Cold Holding - Serving Cold Food	Biological pathogenic micro-organisms	Cold food must be held at 40^{O}F or below	TCS food on cold food serving line.	Check temperature of all TCS foods on cold food serving line with a calibrated thermometer	Monitor product temperature every 2 hours.	Assigned Trained Individual	If product is between 41^{O}F – 45^{O}F rechill to 40^{O}F and below. Discard product if the internal temperature is above 45^{O}F for more than 2 hours	Direct observation by trained Supervisor or Manager. Records review by trained Supervisor or Manager	Hot and Cold Serving Temperature Log - HACCP 1.1.5.f Thermometer Calibration Log - HACCP 1.1.5.z

1. Critical Control Point	2. Specific Hazard to be Addressed	3. Critical Limits (CL)	4. Monitoring				5. Corrective Actions	6. Verification	7. Records
			What	How	When	Who			
CCP 7 – Hot Holding - Serving Hot Food	Biological pathogenic micro-organisms	TCS hot food must be held at 140^{O}F or above	TCS food on hot serving line.	Check temperature of all TCS foods on hot food serving line with a calibrated thermometer	Monitor product temperature every 2 hours.	Assigned Trained Individual	If product is between 135^{O}F and 140^{O}F reheat to 140^{O}F and above. Discard product if the internal temperature is 135^{O}F and below for more than 2 hours	Direct observation by trained Supervisor or Manager. Records review by trained Supervisor or Manager	Hot and Cold Serving Temperature Log - HACCP 1.1.5.f Thermometer Calibration Log - HACCP 1.1.5.z

VII. Validation:

The Sodexo HACCP plan is validated by using the FDA Retail Model Food Code and the Conference for Food Protection Guidance Documents as justification for their critical control points, critical limits, and corrective actions.

VIII. Annex: Forms and Justifications

Annex 1: Hazard Analysis Blank Form: The blank forms can be used when accounts need to create a HACCP plan for Specialized processes such as ROP and acidification of rice.

(1) Process Step	(2) Potential Food Safety Hazards Introduced, Controlled, or Enhanced at this Step (**B**: Biological, **C**: Chemical, **P**: Physical)		(3) Reasonably Likely to Occur Yes or No		(4) Justify Your Decision for Column 3	(5) What Control Measure(s) can be Applied to Significantly Minimize or Prevent Food Safety Hazard	(6) Is this a CCP or oPRP
			Yes	No			
	B						
	C						
	P						
	B						
	C						
	P						

Annex 2: HACCP Plan Blank Form:

1. Critical Control Point	2. Specific Hazard to be Addressed	3. Critical Limits (CL)	4. Monitoring				5. Corrective Actions	6. Verification	7. Records
			What	How	When	Who			

Annex 3: Table A: Sodexo Cooking Temperatures

1. Raw Food Internal Cooking Temperature Requirements – U.S. Only

- **Minimum Internal Temperature Requirements for Cooking Raw Unpackaged Foods.**
- **Commercially packaged food that bears manufacturer's cooking instructions must be cooked according to those instructions.**

140ºF (60ºC) for 15 seconds	Processed foods. Plant based (non-animal/seafood or their by-products), hot vegetables and fruits if being held hot for service. • Plant based foods cooked to order can be cooked to any temperature.
145ºF (63ºC) for 15 seconds	Raw eggs for immediate service, fish, and intact meat (whole muscle) including game animals commercially raised Pasteurized (shell and liquid eggs) can be cooked to any temperature – these products are not considered raw animal products. A raw or undercooked whole-muscle, intact beef steak may be served or offered for sale in a ready-to-eat form if: • The food establishment serves a population that is not a highly susceptible population
145°F (63°C) and held for 4 minutes	Whole meat roasts including beef, corned beef, lamb, pork, and cured pork roasts such as ham
158°F (70°C) or above for <1 second (instantaneous)	Comminuted (ground) fish, meat, and game animals, raw eggs (non-pasteurized shell eggs) for hot holding, Ratites (Ostrich and Emu), mechanically tenderized and injected meats.
165°F (74°C) or above for <1 second (instantaneous)	Poultry. Stuffed fish, meat, pasta, and poultry. Stuffing containing fish, meat, and poultry.

2. Raw Food Internal Cooking Temperature Requirements – Canada Only

- **180°F (82°C) for 15 seconds**
  - Poultry – Whole birds
- **165°F (74°C) instantaneous**
  - Food mixtures containing poultry, eggs, meat, fish, and other TCS/PHF foods
  - Poultry – Pieces, ground, stuffing in poultry
- **160°F (71°C) instantaneous**
  - Ground meat – includes chopped, ground, flaked, or minced beef, pork or fish
  - Pork
  - Lamb
  - Veal
  - Whole cuts – Beef
  - Fish

- **165°F (74°C) for 15 seconds**
  - Shell eggs that will be hot held for service
  - Shell eggs for immediate consumption
  - Pasteurized egg dishes
- **145°F (63°C) for 3 minutes**
  - Rare roast beef
- **140°F (60°C) for 15 seconds**
  - Commercially processed RTE food heated for the first time, that will be hot held
  - Fruits and vegetables that will be hot held for service

Annex 4: Conference for Food Protection Procedures for Handling Refrigerated TCS Food During a Power Outage

Time (Hours)	Product Temperature			
	Maximum Temp up to 45°F (7°C)	Maximum Temp up to 50°F (10°C)	Maximum Temp up to 55°F (13°C)	Maximum Temp up to 60°F (15°C)
Up to 4	Hold/Serve/Sell	Hold/Serve/Sell	Hold/Serve/Sell	Hold/Serve/Sell
				At 4 hours, cook or discard the food if it is still over 41°F (5°C)
				If food temp is back to 41°F within 4 hours, it can be held/served/sold
>4 to 6	Hold/Serve/Sell	Hold/Serve/Sell	Hold/Serve/Sell	
			At 6 hours, cook or discard the food if it is still over 41°F (5°C)	
			If food temp is back to 41°F within 6 hours, it can be held/served/sold	
>6 to 9	Hold/Serve/Sell	At 9 hours, cook or discard the food if it is still over 41°F (5°C)		
		If food temp is back to 41°F within 9 hours, it can be held/served/sold		
>9 to 15	Hold/Serve/Sell			
	At 15 hours, cook or discard the food if it is still over 41°F (5°C)			
	If food temp is back to 41°F within 15 hours, it can be held/served/sold			