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When is a Variance or HACCP Plan Required?

Variances and HACCP plans are required for some types of specialized food processes or specialized food processing methods such as smoking and curing of food and reduced oxygen packaging of food. Requests for variances and HACCP plans are both required to be submitted for a specialized food processing methods. For other processes or deviations from Food Ordinance, only a variance or a HACCP Plan is required. This page will help you decide if you need to submit both a request for a variance and a HACCP plan to the department for approval--or if an approved variance or an approved HACCP plan will suffice.

What is a Variance?

A variance is a written document issued by the LaSalle County Health Department that authorizes a modification or waiver of one or more requirements of the Illinois Food Code or LaSalle County Food Ordinance. Variances are only granted if, in the opinion of the regulatory authority, a health hazard or nuisance will not result from the modification or waiver.

What is HACCP?

Hazard analysis critical control point (HACCP) is a seven-step process an establishment operator can use to develop a food process based, food safety plan. The HACCP process identifies critical control points and aids in the development of food process safety control measures.

What is a HACCP Plan?

A HACCP plan is a written document that delineates the formal procedures for following the Hazard Analysis Critical Control principles developed by the National Advisory Committee on Microbiological Criteria for Foods.

HACCP-based food safety systems are designed to help you evaluate and monitor the flow of food from receiving to serving. To develop a HACCP plan, follow these seven steps:

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 for verification that HACCP is working.

Contents of HACCP PLAN for methods that require a variance Or a formal HACCP Plan

- 1) A categorization of the types of potentially hazardous foods that are covered by the plan.
- 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
- 4) Additional scientific data or other information if requested.

HACCP Planning Information from the FDA

<https://www.fda.gov/Food/GuidanceRegulation/ucm2006801.htm>

When a manager of food service establishments uses the specialized processing methods, he/she is required to apply for a variance and submit a HACCP plan with the application for the variance.

Specialized Food Processing Methods that require a variance and a HACCP plan are:

- 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.
- Removing the tags from shellstock.
- Undercooking of food other than "whole muscle intact beef" and not wanting to use a consumer advisory.
- Custom Processing of animals for personal use in a food establishment.
- Sprouting of seeds or beans
- Reduced oxygen packaging (including cook-chill bagging), where Clostridium botulinum is a concern and only one barrier, i.e., refrigeration exists.
- Preparing, serving or transporting food by another method that is determined by the department to require a variance or HACCP plan.



Cook-chill packaging



Sous Vide packaging



Sushi rice

Processes that require a formal HACCP plan but not a variance:

- Pooling of eggs in a food establishment that serves a highly susceptible population (nursing home, hospital, day care.)
- Preparation of juice packaged in a food establishment
- Preparation of non-packaged juice in a food establishment that serves a highly susceptible population
- Reduced oxygen packaging (where Clostridium botulinum is a concern and more than one barrier exists)

A Variance but not necessarily a formal HACCP Plan is needed:

- If in the opinion of the health officer a health hazard or nuisance will not result from the variance, the health officer may grant a variance by modifying or waiving any of the requirements of the Illinois Food Code or LaSalle County Health Ordinance. If a variance is granted the department will retain the documentation specified in the ordinance.