Critical Control Points in Halal Food Products: A Missing Element in Halal Model
Muhammad Nadratuzzaman Hosen
Senior lecturer at State Islamic University, Jakarta, Indonesia

Abstract

There are three steps in a halal certification model, namely pre-audit, process audit and post-audit. Pre-audit is a preparation time for company to provide all information. This step is a very important step where HC must introduce halal concept and educate a company regarding critical materials. In this step, company must discuss about halal concept and critical materials completely. If company faces difficulties to understand halal concept and does not want to change haram materials, so HC does not need to take another step. In this case, if someone in HC has already given consultation and education to company so another person must be appointed by HC as auditor in processing audit to avoid conflict of interest. In the second step, the auditor focuses on traceability of materials, system and documentation. Sometimes the auditor does not realize that one ingredient is derived from enzymatic process. This is critical because the enzyme comes from pig or animal that is not slaughtered in Islamic ways. In the post audit, who will determine the halalness of products based on auditor reports, Scientist or Islamic Scholar in the area of Islamic Law/Ulama? In many HCs, halalness of products is imposed by scientist at the HCs, is it correct? Another important point in post audit is how company can maintain the halalness of products after getting halal certificate because halal is not only for one time but must be for all time. HC must ask company to set up the system which warrant the halalness of product by making halal policy, halal manual, halal guidance, halal training, verification of halal materials and person who in charge in maintaining halalness of products. Normally, HC does not have capability to control the company after getting halal certificate.

Keywords: pre-audit, process audit, post-audit, halal concept, enzymatic process, warranty

Introduction

Halal Certifiers (HCs) have different backgrounds and characteristics depend on country or state, moslem population, business atmosphere and focus or object. Normally, in European Economic Community (EEC) and in The United State of America, HC is run by peoples who are from Pakistan, India, Suriah, Iran, Suriname, Egypt, etc. They become citizens or permanent residents at those countries, and they are moslems who may have different Islamic Schools of thought and different background of sciences. For example, there were lots of debates at those countries when HC released halal certificate for abattoir such as mechanical vs manual slaughtering, stunning vs without stunning, criteria for slaughter man and separation between halal meat vs non-halal meat at the same abattoir.

Countries like Indonesia, Malaysia and Pakistan are mostly populated by moslem that have ulama with the same Islamic school of thought and have many food scientists. For Indonesia, the Indonesian Council of Ulama (MUI) is HC, thus Ulama determines the halalness of products. At the moment, there is still long debate in the parliament regarding with the law of halal products. Government of Indonesia prefers to issue halal certificate, meanwhile MUI still wants to issue halal certificate. There are four critical issues in parliament debates, namely, institution (kind of body, roles of body, authority of body, authority of ulama), supervisory system, mandatory vs voluntary system, and labeling system. This is because
Indonesia is a secular state, not Islamic state. In contrast, Malaysia put Islam as a formal religion at State level, thus HC is the government body, namely JAKIM.

It can be seen that MUI and JAKIM are non-profit organizations; they work for protecting Indonesian and Malaysian Moslems. This is different with other HCs in EEC, USA, Australia and non-moslem countries, they are companies which have profit orientation to accelerate market or trading in order to protect moslem consumers at domestic and international levels. Thus, standardization, mutual recognition and trust become important issues. Therefore, the competency of Ulama, quality or competency of auditor, quality and availability of technology to detect and determine the haramness of materials or products, and how company maintain the halalness of certified products are very important topics to discuss in this conference.

**Method**

This article uses a descriptive analysis to explain problems based on references, observation and experiences as auditor from 2002 to 2009.

**Problems and Discussions of Critical Control Points in Halal Model**

In general, whatever kinds of halal model, the most important point is to define the capability of HC regarding with focus or object of certification such as abattoir, restaurant, food processing factory or plant (meat base processing, milk base processing, etc), flavor house, cosmetics factory, pharmaceutical factory and vaccine Industry. Not all HCs have the capability to certify all kinds of object of certification, they have to choose certain object(s).

There are six elements of halal model which is required in HC, namely, Ulama, Auditor, Group of Scientist as expertise in certain area, method of audit, audit and management system, and technology or Laboratory. Ulama must have good knowledge in Islamic law since haram and halal are Islamic law.

In practice, Ulama cannot work alone, they ask auditor to audit and to make a report for determining halal or haram of products. This is a critical point when Ulama do not understand auditor’s report. Auditors need to explain perfectly the results of the audit and to make easy Ulama to understand the report, if not, Ulama may conclude in-appropriate decision. That is why communication between Ulama and auditor should be in Islamic language.

Auditors must work on standard operating procedure (SOP). Auditors must have good knowledge and academic background related to object of auditing. For example, Animal Scientist or Veterinary Scientist can audit slaughtering process at abattoir. Food technologist can audit food factory. The problem is there are many auditors have not proper educational background such as Social Science, Economics, Computer Science and Engineering. Can we train these auditors? Another problem, can we accept non-moslem auditors? These problems are critical points to be solved by us.

Some HC bodies do not have Ulama but they have Auditors with a good knowledge in Islamic law, so the Auditors decide halal or haram the products. Meanwhile, at HC bodies which have ulama, they face problem because among Ulama always make a long debate and take a long time to decide halal or haram the products. From those two cases, can we accept
the HC body without Ulama? Can we accept the auditor to decide halal or haram with his knowledge in Islamic law?

Group of Scientist in HC body has important roles to guide an auditor, to set up SOP for auditor, to investigate some problems which are faced by auditors, to develop audit system, to train auditor, to give opinion or scientific judgment to Ulama before deciding halal or haram and to do research regarding with hiding of haramness in raw materials. Group of Scientist is a critical point for HC Body which is located in a non-moslem country because HC cannot afford to hire group of scientist.

Method of audit is for guiding auditor’s work and for analyzing performance of auditor during auditing as well as for evaluating the results of audit. Normally, two auditors are needed for site evaluation in the audited company. The reasons for sending two auditors are not only working faster but also giving opinion each other based on experience and knowledge. Auditor works with Check-list method and traceability method, plus using knowledge and skill for making scientific judgments.

Before auditing, auditors should give explanation or presentation to production division, quality control, and research and development division about the concept of halal or haram of products, especially critical haramness of materials. From my experience, this is a critical point if workers at factory are non-moslem. Auditors should change workers’ mind set in order to understand the concept of halal or haram.

Method of check-list can be useful and effective in auditing since documentation and file system are well organized to provide information of all materials. This method is becoming a critical point when language becomes a problem to communicate each other, for instance, auditing in China.

Method of Traceability is becoming strongly important since the content or substance of some raw materials and materials cannot be detected accurately and precisely by instrument like PCR. The question of this method is that how many steps to trace back the raw materials or materials. This is a job for group of scientists to make decision to avoid doubtful. There are three critical points in terms of traceability, for instance, enzymatic process using animal sources in chemical compound, medium of bacteria propagation, and waste products like skim-milk which is derived from cheese industry.

Normally in the method of traceability, there are critical points for sources of materials and line facility as follows: pork/pork derivatives, haram animals/derivatives, khamr/ khamr derivatives, parts of human body, stored together with non-halal materials and produced on the same production facility with non-halal materials.

System and technology are supporting points in developing the roles of HC body. In terms of auditing system, it can be divided into pre-audit, process audit and post-audit. In pre-audit, client or official company has to meet one expert of group scientist for consultation and getting knowledge how to prepare documents in auditing time. This step is to educate client or official company. One expert of scientist group will decide when the company is ready to be audited. Two auditors other than the member of scientist group must be appointed by HC to avoid conflict of interest. This is a critical point in appointing auditors. That is why HC body should have many auditors to avoid conflict of interest. Can we imagine that when HC body is in non-moslem country?
Apriyantono (2001) mention that there are 5 important components in the system of HC body:

1. **Standard of halal management and halal system.** Halal management is managing of all the function and activities necessary to able to achieve the objective of halal products. Halal system is defined as the organizational structure, responsibilities, procedures, activities, capabilities and resources that together aim to ensure that products, processes or service will satisfy stated or implied aims, i.e., production of halal products.

2. **Standard audit of halal system** is conducted to:
   
   2.1 Determine the conformity of halal system elements with specified requirements.
   
   2.2 Determine the effectiveness of the implemented halal system in meeting specified objectives.
   
   2.3 Verify that non-conformities identified in a previous audit have been rectified as agreed.

3. **Haram Analysis Critical Control Point (HrACCP).** A system which could point out the important points where haram or najees (najasa) materials may contaminate halal materials, as well as avoiding haram materials to be used for the production of halal foods. There are 6 elements which go to make an HrACCP system:
   
   3.1 Identify and assess all haram and najees materials.
   
   3.2 Identify the critical control points.
   
   3.3 Establish the monitoring procedures.
   
   3.4 Establish corrective actions.
   
   3.5 Establish a record-keeping system.
   
   3.6 Establish verification procedures.

4. **Halal guideline.** This consists of general regulation of halal foods and standards procedures of production of halal foods. In addition, specific regulation and procedures may be added, for example, in the case of food additive production.

5. **Halal database.** It consists of list of materials used for food production; information of the source and preparation of each material is mentioned in the list as well as its halal status and other important information.

Post-audit is critical point since company has to maintain halalness of products during validity of halal certificate. In 2008, MUI implemented the halal assurance system which has eleven criteria, namely, halal policy, halal management team, training and education, material, product, production facility, written procedure for critical activities, product handling for product that does not meet criteria, traceability, internal audit and management review. Those criteria can be considered as no risk, low risk, risk and very high risk.

There are only few of HC bodies implement Halal assurance system at the levels of abattoir, restaurant, food factories and flavor house. This system must warranty consumers to consume halal products during validity of halal certificate. This means that halalness of products are
not for one time at auditing process but for all the times. This is the idea of halal assurance system. The question is that Can HC body to enforce companies to set up halal assurance system at non-moslem countries?

Another important point is that HC body can take a sampling of halal products regularly at the supermarket and at retail market by using high-tech instrument like rapid test for checking contamination of haramness materials into halal products such as sausages, meat-ball, meat-burger and etc. Can HC body buy that instrument of rapid test and implement surveillance regularly?

**Conclusion**

This article has already demonstrated Critical Control Points (CCP) at the element of halal model. The numbers of critical point for issuing halal certificate depend on the performance of HC body. HC bodies at moslem country are different with HC bodies at non-moslem, thus CCP is becoming relatively different too. However, halal products must be free from filth or najees or najasa and HC bodies must take responsibility to moslem consumers since they issue halal certificate.

**References**


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