

SPP

PERFORMANCE STANDARDS 416.1 through 416.6

The following is a brief overview of the Sanitation Performance Standards designed to make it easier for Inspectors to understand their duties under the Standards and for Supervisors to be able to assess their Inspectors' efforts during a visit. The Sanitation Performance Standards are a collection of activities formerly handled by separate codes under PBIS. The Inspector should understand that, far from being de-emphasized, the Sanitation Performance Standards have, as their base, the goal of overall sanitation in the plant. Without this basic level of sanitation, it would be difficult, if not impossible, for the plant to produce product that is not adulterated. This synopsis is intended only as a guide in the performance of basic sanitation and the areas that require investigation.

416.1 This general rule states that the plant must be maintained in such a manner that insanitary conditions do not develop. While not causing direct product contamination (handled under PBIS procedure, 01 SSOP), an environment may lead to adulteration. Plants should be encouraged to handle such problems while they're still minor.

416.2a This section replaces the Manual of Procedures sections (8.46-51) which dealt with pest and rodent control. The Regulations no longer mandate a written plant program. But maintaining the grounds to prevent pest and rodent problems from developing is the goal of this section. Buildup of weeds or trash outside or inside the plant may lead to a pest or rodent problem at a later date. Such conditions are documented under the 06D01 PBIS code until the Inspector determines a real danger of product involvement is present. While it is not automatic that repetitive noncompliances in this area will lead to an SSOP problem, this may occur. As we discussed in class, it's not the hole in the wall that's the problem, it's what enters through that hole. There has been some confusion on this statement. The hole in the wall is a problem – an 06D01 problem. But unless the Inspector can tie the hole to a pest/ rodent or product contamination problem inside, it is not an SSOP problem. While it is common for Inspectors and Supervisors to make regular tours of the facility looking for such problems, it is really the plant's job.

416.2b This section requires the plant to choose the materials for its own construction rather than inspection mandating. The only regulatory requirement as far as materials is that they must be durable and able to be cleaned as necessary to prevent insanitary conditions. The plant must maintain the facility to prevent pest or rodent entry. Failure to do so results in noncompliance under the 06D01 PBIS code. As stated above, pest or rodent problems inside the facility, as determined by the Inspector, are addressed under the 01 PBIS process, SSOP. While the Regulations no longer require a specific means of separating edible from inedible products, this section requires the plant to ensure that their method neither results in product contamination nor insanitary conditions.

416.2c This section requires the plant to have lighting sufficient to prevent product contamination and to allow the Inspector to perform their duties. The only places where inspection mandates lighting intensity are at ODMI inspection sites. The Inspector may determine through finding contaminated product that other

areas may require more lighting. Inspector questions should be referred to District Supervisors.

416.2d This section requires the plant to control odors and condensation to the extent that direct product contamination does not occur. Some odors and condensation are unavoidable while others must be controlled as direct product contamination will, or has already occurred. The main goal of this section is dealing with condensation before product becomes involved. Any area where adjacent rooms are of differing temperatures will probably require the plant's or Inspector's attention. Findings of condensation would be addressed either under 06D01 or, if product were contaminated, 01B/C02.

416.2e This section requires the plant to have, and maintain its plumbing to the extent that insanitary conditions do not develop. Any size drain is acceptable until the Inspector determines an insanitary condition exists (e.g. water pooling at a drain or leaking from pipes onto the floor). Wastewater connections must not connect with product manufacturing connections.

416.2f This section requires the plant to handle sewage in a manner that does not result in an insanitary condition. Documentation that a sewage system is acceptable is usually continuing rather than requiring annual update. The documentation for sewage systems would be found either in blueprint narratives, on the specifications sheet of the blueprints, or as a separate letter. Any question regarding the effectiveness of a plant's sewage system should be referred to District Supervisors.

416.2g This section requires the plant to have an acceptable water supply (municipal or private) sufficient to adequately clean the facility and supply documentation attesting to its acceptability (whenever the Inspector has legitimate concerns for municipal, six months for private). The Inspector should question the water supply when there are unusual colors or odors from the water, when a water line break is reported, or when a boil order is issued by local authorities. Weekly meeting would be a means of discussing the plant's plan in such events.

416.2h This section requires the plant to have adequate facilities for the employees' dressing, restroom, and handwashing needs. These areas themselves must be maintained sufficiently to prevent insanitary conditions from occurring. Accumulation of dirty clothing, human waste, or observation of a lack of employee hygiene are addressed under the 06D01 PBIS code unless the Inspector determines that product contamination is certain to occur. Inspectors should be aware that by their appearance and actions, they are setting a standard for the plant employees.

416.3 This section requires the plant to purchase, and maintain, equipment so that direct product contamination does not occur. The materials of some equipment readily deteriorate resulting in a flaking surface or chips breaking off. If the Inspector determines that such equipment is going to be used, action preventing product contamination should be taken. Again, weekly meetings are one place for the Inspector to address concerns over new equipment with the plant (the plant must address as a re-evaluation of its SSOP per 416.14). This section also requires the plant to have separate receptacles for inedible storage. These must be marked and maintained by the plant.

416.4 This section requires the plant to maintain the facilities, equipment, and utensils in a manner that prevents direct product contamination. Food contact surfaces must be cleaned often enough that insanitary conditions do not develop nor product contamination occur. The same standard applies for non-food contact surfaces although it is less likely that direct product contamination will result. It is this section's goal to protect product from entry into the plant to shipment from the plant. Any situation that may affect the product may be addressed by the Inspector using the 06D01 PBIS code. The plant is required to document any chemicals used. The Inspector should observe to determine that the plant is using any chemical per this documentation (e.g. letter or label directions).

416.5 This section requires the plant to maintain their employees in a manner so that neither insanitary conditions exist nor product contamination occur. Employees must report to work clean, maintain themselves and their garments in a clean manner, and not have open sores or wounds. The Inspector determines when an employee's garment needs changing first by referring to the plant SSOP for the plant's standard. But the Inspector must use their judgement in determining if any garment requires changing.

416.6 This section deals with the Inspector's duty as far as the Sanitation Performance Standards. If the Inspector makes the determination that anything in the plant environment may cause product adulteration, they should take regulatory control (apply a Ohio Rejected Tag). The Inspector should never walk away from a situation they feel may result in product adulteration.

The phrase " insanitary condition " has been used a lot in this and other materials. It is a simple standard to define but sometimes difficult to judge. Every Inspector knows what a sanitary condition is. If the Inspector has questions about the plant environment that concern product adulteration they should act using the Sanitation Performance Standards under the 06D01 PBIS code. If direct product contamination is observed it is documented and handled under the 01 PBIS process code (either 01B02 or 01C02).

It should also be mentioned to the plants that it is now their responsibility to assess their facilities, equipment, utensils, and operations on a regular basis. A regular inspection of their operation, with documentation of any problems they might find, will make SSOP work. And, by law, if the plant finds and documents corrective actions of a problem, Inspection must allow the plant to try to solve the problem. I am aware that not every plant wants to perform this duty. But if there's something of value in it for them (i.e. Inspection leaves them alone to solve their problems), and this is explained to them, they might just decide to do it.