

PrimusGFS Audit

GMP

(Module 2) Guidelines

Used in conjunction with PrimusGFS V2.1-2c audit
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Module 2 GMP

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These guidelines help interpret/support the principles, requirements and expectations of the PrimusGFS v2.1-2 Modules 1, 2 and 3 as noted in the Scheme normative documents. These guidelines are not exhaustive or exclusive and detail minimum requirements only by means of statements related to audit questions and expectations. There will be variations in applicability to an operation based on the process(es) and commodities involved. Auditors and auditees should interpret the questions and criteria in different situations, with the food safety and risk minimization being the key concerns.

The operation practices, policies and procedures should be pertinent to the situation at hand and be able to stand up to any challenge by an auditor or other relevant interested party (including law enforcement). Where laws, customer requirements and specifications, commodity specific guidelines and/or best practice recommendations exist and are derived from a reputable source these practices and parameters should be followed if they present a higher level of compliance/compliance than those included in the audit scheme system.

Website links shown in this document are there to aid understanding and provide assistance by way of example (link listings are not exhaustive). These links are not a sign of endorsement by Azzule. Furthermore Azzule Systems accepts no liability for the content of these links.

Please be aware that there is additional information on the PrimusGFS website including the audit checklist templates. The Primusgfs website also has access to the official PrimusGFS General Regulations which explains the overall scheme scoring systems and other details of the scheme

The following is a modified excerpt from PrimusGFS General Regulations v2.1-2. It is provided here as an introduction to the audit notes. For full and current text please refer to the most recent version of PrimusGFS General Regulations at <http://www.primusgfs.com/documents.aspx>.

Audit Execution

The audit should be performed using the most recent version of the PrimusGFS normative documents. The PrimusGFS Standard is divided into three Modules:

- Module 1 - Food Safety Management System
- Module 2 - GAP and/or GMP options
- Module 3 – HACCP program

Each Module is divided into sections, related to the specific Module and each section includes questions that detail the requirements for the specific section.

Please note, with all operations it is imperative that the facility is running product i.e. processing, packing, cooling (whatever functions are usually occurring as on a “normal” day) and that a normal compliment of personnel are on site when the audit occurs in order for the auditor to complete a valid assessment.

Scoring System

The audit format is updated as needed. This may include the layout, the questions themselves and point assignments. The following is the scoring system used for the PrimusGFS audits:

Module 1	Module 2		Module 3
Food Safety Management System	GAP Option	GMP Option	HACCP
Possible answers: <ul style="list-style-type: none"> • Total Compliance • Minor Deficiency • Major Deficiency • Non Compliance • Non Applicable 	Possible answers: <ul style="list-style-type: none"> • Yes • No • Not Applicable 	Possible answers: <ul style="list-style-type: none"> • Total Compliance • Minor Deficiency • Major Deficiency • Non Compliance • Non Applicable 	Possible answers: <ul style="list-style-type: none"> • Total Compliance • Minor Deficiency • Major Deficiency • Non Compliance • Non Applicable

For questions in Module 1, Module 2 – GMP option and Module 3, the amount of deficiencies and the associated risks have to be considered to assign the severity of the finding, which can be Minor Deficiency, Major Deficiency and Non Compliance. When no deficiencies are found, a Total Compliance is given. Some general statements for the scoring decision are described in the table below. These statements are superseded by the criteria described in the question's expectations and users should be aware that some questions do not follow these general statements e.g. automatic failure questions. The possible answers to the questions in each Module are listed in the following table:

Scoring system for questions in Module 1, Module 2 – GMP option and Module 3				
Possible answer	Possible Points for the question			
Total compliance	15 points	10 points	5 points	3 points
Minor deficiency	10 points	7 points	3 points	2 points
Major deficiency	5 points	3 points	1 points	1 points
Non-compliance	0 points	0 points	0 points	0 points
Not applicable	0 points	0 points	0 points	0 points

For questions in Module 2 GAP option, the scoring system is described in the table below:

Scoring system for questions in Module 2 – GAP option								
Possible answer	Possible Points for the question							
Total compliance (may be Yes or No)	20 points	15 points	10 points	7 points	5 points	3 points	2 points	0 points
Non-compliance (may be Yes or No)	0 points	0 points	0 points	0 points	0 points	0 points	0 points	0 points
Not applicable	0 points	0 points	0 points	0 points	0 points	0 points	0 points	0 points

Each question and compliance has to be looked at individually and scored according to the severity of the deficiency, the number of deficiencies and the associated risks. Detailed compliance requirements are noted in this Auditor Guidelines document, but some general statements are described below. These statements are superseded by the compliance criteria and users should be aware that some questions do not follow the general statements below e.g. automatic failure questions.

Compliance for questions in Module 1, Module 2 – GMP option and Module 3	
Answer	Criteria used
Total compliance	To meet the question and/or compliance criteria in full.
Minor deficiency	<p>To have minor deficiencies against the question and/or compliance criteria.</p> <p>To have single or isolated non-severe deficiencies (usually up to three) against the question and/or compliance criteria.</p> <p>To have covered most of the question compliance criteria, but not all.</p>
Major deficiency	<p>To have major deficiencies against the question and/or compliance criteria.</p> <p>To have numerous non-severe deficiencies (usually more than three) against the question and/or compliance criteria.</p> <p>To have single or isolated severe deficiencies against the question and/or compliance criteria.</p> <p>To have covered some of the question compliance criteria, but not most of it.</p>
Non-compliance	<p>To have not met the question and/or compliance criteria requirements at all.</p> <p>Having systematic deficiencies against the question and/or compliance criteria (severe or non-severe issues).</p>
Not applicable	The requirement described in the question is not applicable for the operation being audited. Justification should be provided in the auditor's comments. Be aware that there are some questions that do not allow a not applicable response.

For questions in Module 2 – GAP option, if deficiencies for the question and/or the applicable expectations for that question are found, assign the answer to each question as described below in the general statement of the table. These statements are superseded by the criteria described in the question's expectations and applicants and users should be aware that some questions do not follow these general statements e.g. automatic failure questions

Compliance for questions in Module 2 – GAP option	
Answer	Criteria used
Total compliance (can be Yes or No, depending on the question)	To meet the question and/or compliance criteria in full. This is when the answer Yes or No is the same as the “earning points answer”.
Non-compliance (can be Yes or No, depending on the question)	The question or compliance criteria has not been fully met. This is when the answer Yes or No is NOT the same as the “earning points answer”.
Not applicable	The requirement described in the question is not applicable for the operation being audited. Justification should be provided in the auditor's comments. Be aware that there are some questions that do not allow a not applicable response.

Automatic Failure

There are some questions that if down scored will lead to an automatic failure and an overall score of 0% for the corresponding Module. On being immediately informed of the automatic failure by the auditor during the audit, the auditee has the option to have the auditor continue to complete the audit or to have the audit halt at that point (all charges will apply).

Special Circumstances For Not Certifying

Please also note, that under special circumstances and upon finding serious food safety risks a “not certified” decision can be attributed. The auditee should be immediately informed of the automatic failure by the auditor during the audit. The auditee has the option to have the auditor continue and complete the audit or to have the audit halt at that point (all charges will apply).

There are other Special Circumstance that are not technical in nature, examples of these include detection of deliberate illegal activities like deliberate mislabeling, discovery of falsified records, attempting to bribe an auditor/CB officer, threatening behavior towards an auditor/CB officer, etc.

Audit Termination

Once an audit has been started, should the auditee wish to stop the audit for any reason, the auditor will complete the report for as many questions as they were able to verify. PrimusGFS audits cannot be converted into a pre-assessment audit once the audit has been started. If an audit is terminated early then questions that the auditor was unable to verify, will be marked as non-compliance and receive a score of zero. For questions unable to be verified the auditor will indicate the audit was terminated at the request of the auditee before the auditor could verify whether or not the audit conformed to the

compliance criteria of the question. A report will be created on the database and issued and all charges will apply.

Documentation Requirements

Organization's Food Safety Systems:

When an Organization and its associated Operations are being audited the auditor is checking the systems (SOP's, policies etc. in Module 1 FSMS) and the implementation of these systems (Module 2).

While usually auditees often create and implement their own systems, they can also use systems that have been created by other entities, for example, their customers technical manager, their consultants etc or a combination of resources.

For example, an Organization may opt to create their own SOP's, in other instances utilize SOP's templates provided by other entities. As long as the systems meet the requirements of the PrimusGFS questions and expectations and these systems are being implemented properly, the auditee should receive full points for their efforts. The auditee is responsible for ensuring that the systems they use are reviewed, maintained and up to date. If the auditor detects any inconsistency, it will result in a down score.

New Auditees/First Time Auditees

- **In operation for more than three consecutive months** – auditee should have at least three months of documentation available for review. If the auditee has less than three months of most of their documentation available for review a pre-assessment audit is strongly advised. If the auditee has less than three months of most of their documentation available for review and decides to have a regular audit, they should be aware that they **cannot receive full conformance for paperwork questions relating to monitoring and that the down score will be based on the amount of paperwork available.**
- **Short season operation, in operation for less than three consecutive months** - auditee should have at least three months of documentation available for review (this may include last season's documentation). Where an operation does not have three months of records available (e.g. one month of operation per year) auditee should have at least the previous season's records available for review. If the auditee has less than three months of most of their documentation available for review and decides to have a regular audit, they should be aware that they **may not receive full conformance for paperwork questions relating to monitoring and that the down score will be based on amount of paperwork available.**

Existing Auditees

- **In operation for more than three consecutive months** – auditee should have documentation available from the date of the prior audit.
- **Short season operation, in operation for less than three consecutive months** – auditee should have at least three months of documentation and documentation at least since the last audit (which includes the last season). Where an operation does not have three months of records available (e.g. 1 month of operation per year) auditee should have at least the previous season's records available for review.

	Operates <three months/year	Operates >three months/year
New Auditee	Three months of records (may include last season's records)	Three months of records (may include last season's records)
Existing Auditee	Records at least since last audit (or longer) to meet minimum requirement of three consecutive months of records	Records since last audit

Visual versus Verbal Confirmation

Visual confirmation is the default method of auditing, whether on the visual inspection portion or the paperwork section. Scores and comments are assumed to have been visually confirmed, unless otherwise stated. Verbal confirmation should be the exception to the rule and, if auditing properly, these should be rarely used. If a verbal confirmation is accepted, the auditor should write this in the comments section of the question.

How to Use Point Assignment Guidelines

The following sections of this guidance manual are designed to help the users choose the right score for each question, thereby helping to ensure consistency. This document does not cover all situations and is intended to be a guideline, as opposed as a rule. Auditors are expected to follow the guidelines as much as possible, but it is understood that there will be situations where an auditor should use their discretion. If an auditor does have to make a judgment call and/or tackle a situation not covered by this manual, then the auditor should note the circumstances in the audit report with full justifications. (The auditor should also forward these details to Azzule in a separate note, so that this can be accounted for in the next version of the manual.)

In order to be consistent with the voluntary nature of requesting a third party audit, and in order not to seem to be a legal document, the requirements within the questions are written as “should”, and can be scored against. In other questions that use the term “ideally”, these statements cannot be scored against, but give the auditee an opportunity for improvement.

Notes in “red” are where the questions and/or conformance criteria have changed significantly since the previous version. Many of the changes are to improve clarification, but some are changes to the actual requirements. Please read carefully to see if these changes impact your particular situation.

At the end of this document, there is a helpful applicability chart that briefly summarizes the use of “N/A” with some of the questions. While there may be technical flaws in the applicability chart, the aim is to ensure auditor-to-auditor consistency.

Glossary

Agricultural Inputs

Materials used in the production of crops including seeds, transplants, rootstock, cuttings, fertilizers, crop protection products, adjuvants, growth promoters, predator additions, irrigation water and any other material inputs into the growing process.

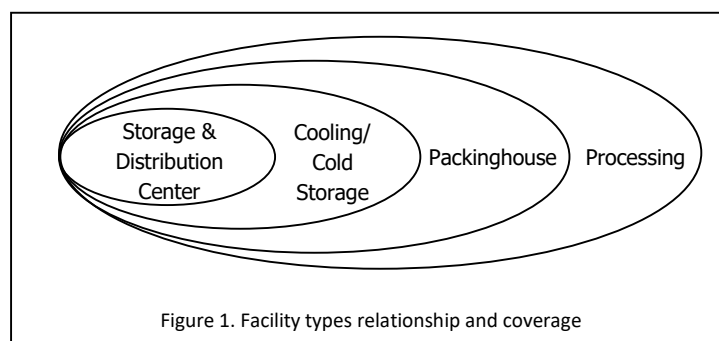
Cooling Cold Storage

This type of facility is where they are not only receiving and storing finished goods but performing some kind of pre-cooling and/or cooling activities. In this type of facility, no packing or processing activities are being performed, if so, a different type of facility operation shall be used. A Cooling Cold Storage facility covers the activities involved in the Storage & Distribution Center type.

Facility operation

A handling operation carried out in one or several buildings where product is being handled. The type of Facility operation can be classified as: “Storage & Distribution Center”, “Cooling Cold Storage”, “Packinghouse” or “Processing”.

The following image describes the scope of each one of the facility types described in this certification scheme:



Auditees should not apply for multiple GMP audits of different operation types at the same address, unless there is different ownership.

Field operation

A growing operation carried out in an open or in a covered area for the production of fresh produce for human consumption. The type of Field operation can be classified as: “Ranch” or “Greenhouse”, they can both include or not include a “Harvest Crew”. In addition, standalone “Harvest Crew” audits can also be performed that do not need to be performed in conjunction with a “Ranch” or “Greenhouse” audit.

Greenhouse

A greenhouse is defined as a temporary or permanent enclosed structure where crops are grown in a controlled environment. Does not include shade or hoop houses. Product grown under this type of operation is marketed as "Greenhouse grown".

Harvest Crew

A "harvest crew" is defined as a crew of harvest personnel under common management.

Packinghouse

This type of facility is where whole commodities are sorted and/or sized, may be minimally trimmed (not altered in form), washed or not washed, possible post-harvest fungicide treatments applied (e.g. wax treatments) and packed for commercial distribution and use by consumer or retail establishment. In this type of facility, no processing activities are being performed, if so, a different type of facility operation shall be used. A Packinghouse facility covers the activities involved in the Storage & Distribution Center and Cooling/Cold Storage facilities.

Processing

This type of facility is where whole commodities are minimally processed and altered in form by peeling, slicing, chopping, shredding, coring, or trimming, with or without washing, prior to being packaged for use by the consumer or a retail establishment (e.g., pre-cut, packaged, ready-to-eat salad mixes). In this type of facility, processing activities are being performed, if not, a different type of facility operation shall be used. A Processing facility covers the activities involved in the Storage & Distribution Center, Cooling/Cold Storage and Packinghouse facilities.

Ranch

A "ranch" is defined as a parcel of ground (not necessarily a "lot" for production purposes) with the following characteristics: common management, common water supply and contiguous grounds. For the purpose of farm or ranch audits, a ranch or farm is defined as contiguous ground that is under common management.

Storage & Distribution Center

This type of facility is where they are only receiving and storing finished goods for further shipment e.g. regional distribution warehouses.

In this type of facility, no cooling, packing or processing activities are being performed, if so, a different type of facility operation shall be used.

Module 2

General GMP

2.16.01: Is there a designated person responsible for the food safety program?

Total compliance (10 points): There should be a designated person(s) in charge of the facility's food safety programs including food safety document control and verification of sanitation activities. This person(s) is/are ideally a manager within the company independent of production.

Non-compliance (0 points) if:

- No-one is in charge of food safety programs including food safety document control and verification of sanitation activities.

2.16.02: Are all chemicals (pesticides, sanitizers, detergents, lubricants, etc.) stored securely, safely and are they labeled correctly?

Total compliance (15 points): Chemicals are stored in a designated (with a sign), dedicated, secure (locked) area, away from food and packaging materials and separated from the production areas. Access to chemicals needs to be controlled, so that only personnel who understand the risks involved and have been trained properly are allowed to access these chemicals.

All chemical containers should have legible labels of contents; this includes chemicals that have been decanted from master containers into smaller containers. Where chemicals are stored, adequate liquid containment (spill controls) techniques need to be employed (secondary containment, absorbent materials, angled sealed floors, spill kits etc.). Chemical storage should be designed to help contain spills and leaking containers. Large volumes (e.g. 55 gallon drums) in use next to a wash line should be secured in some way (e.g. anchored, chained) and on spill containment. Empty containers should be stored and disposed of safely. Liquid should not be stored above powders.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of chemicals not properly stored.
- Single/isolated instance(s) of improperly labeled or unlabeled chemical containers.
- Single/isolated instance(s) of empty containers either not being stored properly or disposed of properly
- The chemical storage area is not marked to indicate its use.
- Single isolated instance(s) of chemicals being used without proper attention to chemical spillage.

Major deficiency (5 points) if:

- Numerous instances of improperly stored chemicals.
- Numerous instances of improperly labeled or unlabeled chemical containers.
- Chemical storage is segregated in a designated area, but not locked.
- Chemical storage area(s) has inadequate liquid containment systems.
- Spilled chemicals found in the chemical storage areas (not cleaned up properly)
- Numerous instances of empty containers either not being properly stored or disposed of properly.
- Numerous chemicals being used without proper attention to chemical spillage.

Non-compliance (0 points) if:

- There is no designated area for chemicals.
- There is a designated area for chemicals but it is not an enclosed or locked area.
- Visible chemical spills in the facility and surrounding grounds that have not been cleaned up.

2.16.03: Are "food grade" and "non-food grade" chemicals used, handled and stored in a controlled manner?

Total compliance (10 points): Food grade chemicals, including lubricants, greases, etc., are used in all product/packing contact areas. Food grade chemicals should be stored apart from non-food grade items to eliminate confusion between types. Non-food grade chemicals also include cleaning chemicals and paint, for example use of domestic polishes which are not intended for food contact surfaces and have strong fragrances should not be used on food contact surfaces; office cleaning materials, restroom cleaning material, truck cleaning materials should be stored separately from production cleaning materials. Grease guns should indicate which are for food grade greases and which are for non-food grade use. Non-food grade material use, where required should not be used in food contact areas and be entrusted to personnel who know how to use the chemicals to avoid contamination issues. Non-food grade materials should not be found in the production/storage areas (unless stored securely, with access to entrusted personnel only). Chemicals should be used according to label instructions e.g. following correct dilutions, only food grade salt should be used in ice injectors, H1 designation on lubricants, etc. Food grade lubricants/oils should be used on air compressors if compressed air is used in direct contact with food, food contact surfaces and interior of surface of packaging. Any chlorine bleach that is used for making a sanitizing solution, whether for equipment or raw produce, must be of sufficient purity to be categorized as a "food grade" substance. Some commercially available household chlorine bleaches contain fragrances, thickeners and/or other additives not approved for food use. These products are not suitable for making sanitizing solutions. If any chemicals are used to alter or buffer the pH of a sanitizing solution these should also be "food grade."

NSF International: Nonfood Compounds

<http://info.nsf.org/USDA/Listings.asp>

http://www.ceecis.org/iodine/07_legislation/00_mainpage/codex_food_grade_salt.pdf

<http://pods.dasnr.okstate.edu/docushare/dsweb/Get/Document-963/FAPC-116web.pdf>

Minor deficiency (7 points) if:

- Single/isolated instance(s) commingling of non-food grade with food grade chemicals.
- Single/isolated instance(s) grease guns not being coded for food grade/non-food grade materials.
- Single/isolated instance(s) of non-food grade materials found/used in the production/storage areas.
- Single/isolated instance(s) of a chemical being used contrary to label.

Major deficiency (3 point) if:

- Numerous instances of commingling of non-food grade with food grade chemicals.
- Numerous instances of grease guns not coded for food grade/non-food grade materials.
- Numerous instances of non-food grade materials found/used in the production/storage areas.
- Numerous instances of a chemical(s) being used contrary to label.

Non-compliance (0 points) if:

- No attempt to split non-food grade from food grade materials.
- Systematic use of non-food grade materials found/used in the production/storage areas.
- Systematic used of a chemical(s) used contrary to label.
- **Evidence of the use of a non-food grade that has caused product contamination – revert to 2.18.05, automatic failure.**

2.16.04: Are signs supporting GMPs posted appropriately?

Total compliance (10 points): Signs for proper GMP's need to be posted visibly and in the language of the workers (visual signs are allowed) in the following areas –

- Before entering areas that require hair nets and smocks.
- Before areas that prohibit food consumption, drinking, tobacco products, chewing gum.

- Bathrooms and break-room(s) should have hand-washing signs as reminders to wash hands before eating, returning to work, after using the toilet.

Signage reminding workers and visitors of GMP rules around the site are very useful (but should not cause down score) such as additional PPE rules, hand dip/gel use (where relevant), not allowing personal items in the production areas, etc.

Minor deficiency (7 points) if:

- The signs are not in the workers' language (visuals are acceptable)
- Single/isolated instance(s) of required signs not being in position.

Major deficiency (3 points) if:

- Numerous instances of required signs not being in position.

Non-compliance (0 points) if:

- Systematic failure to place signs in the required positions.

2.16.05: Are the necessary food defense controls implemented in the operation?

Total compliance (10 points): The operation should have implemented the necessary controls for preventing intentional contamination of the product and high risk areas. These measures should be based on the risk associated with the operation. Some high risk areas of the facility include: water sources, storage areas for product, materials, chemicals, tools, utensils or other items used in the facility, production areas, shipping areas, etc.

Minor deficiency (7 points) if:

- Single/isolated instance(s) are observed of an area lacking necessary controls.

Major deficiency (3 points) if:

- Numerous instances are observed of areas lacking necessary controls.

Non-conformance (0 points) if:

- Systematic non-conformance to implement necessary food defense controls.

FSIS has created a self-assessment guideline for food processors titled "Food Security Guidelines for Food Processors". These guidelines are available at:

<http://www.fsis.usda.gov/Oa/topics/SecurityGuide.pdf>. The associated self-assessment checklist is available at

http://www.fsis.usda.gov/shared/PDF/Self_Assessment_Checklist_Food_Security.pdf?redirecthttp=true.

FDA Food Security Preventive Measures Guidance,

<http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/fooddefense/ucm083075.htm>

PMA Food Defense Guidance, <http://www.pma.com/resources/issues-monitoring/food-security>

FSIS Food Security Guidance, <http://www.fsis.usda.gov/Oa/topics/SecurityGuide.pdf?redirecthttp=true>

FDA Guidance for Industry,

<http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/FoodDefense/>

Pest Control

2.17.01: Are products or ingredients free of insects/rodents/birds/reptiles/mammals or any evidence of them? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total compliance (15 points): Raw materials, work in progress, ingredients, finished goods are free from evidence or the infestation of insects/rodents/birds/reptiles/mammals (humans, dogs, etc.). See 2.17.03 for reference for potential indications of pest presence.

Automatic Failure (0 points) if:

- **There is a single incidence of direct contamination on or in products or ingredients.**

2.17.02: Are packaging supplies free of insects/rodents/birds/reptiles/mammals or any evidence of them? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total compliance (15 points): Packaging supplies are free from evidence or the presence of insects/rodents/birds/reptiles/mammals (humans, dogs, etc.). See 2.17.03 for reference for potential indications of pest presence.

Automatic Failure (0 points) if:

- **There is a single incidence of direct contamination of packaging.**

2.17.03: Are plant and storage areas free of insects/rodents/birds/reptiles/mammals or any evidence of them?

Total compliance (15 points): All areas are free of recurring/existing internal pest activity. Specifically there should be:

- No recurring/existing rodent activity and/or bird nesting observed around the interior perimeter or the facility.
- No evidence of animals observed inside the facility such as cats, dogs, deer, etc., including tracks and animal damage.
- No evidence of feces/pellets.
- No evidence of pests including insects, spiders/webbing, rodents, lizards, ants or birds in the facility.
- No evidence of gnawed bags/sacs or rodents on stored stock or numerous excreta on the floor/shelves of any storage area.
- No decomposed rodent(s) or other animals (frogs, lizards, etc.) in traps. The interior traps should be checked often and the dead rodent(s) or other animals removed.

Any live insect activity is an issue and should be graded accordingly. Insects should be at a minimal level on glue boards. The facility should have additional glue boards for replacement/change out.

Pests of Homes, Structures, People, Pets - UC Pest Notes,

<http://www.ipm.ucdavis.edu/PMG/menu.house.html>

National Pest Management Standards, Pest Management Standards for Food Plants

http://www.npmapestworld.org/documents/Foodplantstandards2010_000.pdf

Minor deficiency (10 points) if:

- Single/isolated instance(s) of pest activity noted on the interior of the facility, which does not pose an immediate threat of product contamination.
- Single/isolated instance(s) of feces/pellets noted in the interior of the facility, which does not pose an immediate threat of product contamination.
- Single "fresh" rodent found in an internal trap.

Major deficiency (5 points) if:

- Numerous instances of pest activity (including feces/pellets) noted in the interior of the facility, which does not pose an immediate threat of product contamination.
- Pest activity (including fecal matter), which has the potential for contaminating product.
- Two to three instances of “fresh” rodents found in internal traps.

Non-compliance (0 points) if:

- One sighting (including feces/pellets) which has the potential for product contamination.
- Evidence of live animals observed inside the facility.
- Decomposed rodent(s) in trap(s).
- More than three “fresh” rodents found in internal traps.
- **Any observation of contaminated ingredient, product or packaging contact. (This qualifies as an automatic failure under 2.17.01 and 2.17.02).**

2.17.04: Is the area outside the facility free of evidence of pest activity?

Total compliance (10 points): All areas should be free of recurring/existing external pest activity. Specifically there should be:

- No recurring/existing rodent or animal (e.g. dogs, humans, etc.) activity/spoors (significant burrows, trails, feces, tracks) in active areas within operation’s property perimeter e.g. storage (packaging, bone yards), outbuildings (e.g. shade structures), etc.
- No bird nesting/activity observed around the exterior perimeter of the facility or external storage/outbuildings e.g. pallets, trailers/containers, bone yards, etc.
- No decomposed rodent(s) or other animals (frogs, lizards, etc.) in bait stations or along perimeter.

There should be no down scores attributed to finding a few (three or less) “fresh” rodents and/or evidence of rodent feeding in the external traps.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of recurring/existing rodent or animal (e.g. dogs, humans, etc.) activity/spoors (burrows, trails, feces, tracks, etc.)
- Single/isolated instance(s) of bird nesting observed around the exterior perimeter of the facility or external storage/outbuildings e.g. pallets, trailers/containers, bone yards, etc.

Major deficiency (3 point) if:

- Numerous instances of recurring/existing rodent or animal (e.g. dogs, humans, etc.) activity/spoors (burrows, trails, feces, tracks, etc.).
- Numerous instances of bird nesting observed around the exterior perimeter of the facility or external storage/outbuildings e.g. pallets, trailers/containers, bone yards, etc.
- Numerous (more than three) external traps inspected showing evidence of rodent activity.
- Single instance of a decomposed rodent or other animal (frog, lizard etc.) in external traps or along perimeter.

Non-compliance (0 points) if:

- Evidence of significant (infestation level) rodent activity (burrows, trails, feces, tracks, animal spoor)
- Significant bird activity in traffic zones.
- More than one decomposed rodent or other animals (frogs, lizards, etc.) in external traps or along perimeter.
- **Any observation of contaminated ingredient, product or packaging contact qualifies as an automatic failure under 2.17.01 and 2.17.02.**

2.17.05: Does the operation have a pest control program? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total compliance (15 points): The operation has a pest control program (in-house or contracted) to control rodents (also insects, reptiles and birds where necessary) and prevent infestation.

Automatic Failure (0 points) if:

- **The operation does not have a pest control program.**

Potentially useful website:-

National Pest Management Standards, Pest Management Standards for Food Plants

http://www.npmapestworld.org/documents/Foodplantstandards2010_000.pdf

2.17.06: Are pest control devices (inc. rodent traps and electrical fly killers) located away from exposed food products? Poisonous rodent bait traps are not used within the facility?

Total compliance (10 points): Care should be taken to place pest control devices in such a manner that they do not pose a threat of contaminating product, packing or raw materials. This includes the following restrictions:

- Poisonous bait stations and other pesticides should only be used outside the facility.
- There should be no domestic fly sprays used within the production and storage areas.
- Block bait as opposed to grain and pellet bait should be used (except for the external use of National Organic Program approved materials).
- If used, insect light traps (ILTs), electrical fly killers (EFKs) or pheromone traps should be regularly cleaned out (kept free from a build-up of insects and debris). Sticky type ILTs should be monitored at least monthly and the sticky board replaced if ineffective. ILTs that use sticking as opposed to zapping methods (EFKs) are preferred.
- If used, insect light traps or electric fly killers should not be placed above or in close proximity (10 feet, 3 meters) to product, food contact surfaces, equipment, or packaging material. Electric fly killers or insect light traps should not be located above dock doors (due to potential forklift damage) or in front of doorways (so attracting insects into the facility). Hallways or dock areas where product passes through are exempt from these distances, as long as product does not stop or is not stored in hallway or dock.
- If used, insect light trap bulbs should be replaced at least every 12 months (this should be recorded), or as more frequently if directed by manufacturers.
- No fly swatters should be evident in production or storage areas.
- No bait should be found outside of bait stations.
- If necessary (e.g., in facilities with high dust levels (e.g., potatoes, onions)) where glue boards may not be practical, multiple-catch traps may be **supplemented** with snap traps inside stations. Snap traps should not use allergen containing baits (e.g., peanut butter). Any supplemental snap traps inside stations should be checked at least weekly and checks recorded (2.17.07).
- Snap traps can only be used when monitoring traps e.g. tin traps show that there is a serious problem and eradication steps are required. Snap traps should be placed inside a trap box and checked daily (and recorded). Snap traps should not use allergen containing baits e.g. peanut butter. Snap traps are only allowed as a short term emergency eradication solution since they present several risks.
- Any indoor use of chemicals e.g. knock down sprays should be done without contaminating food, packaging, and equipment (see the next bullet point regarding poisonous rodent baits). All applications should be recorded properly (scored 2.26.03), detailing where and when the application occurred and any special methods used to avoid contamination. All applications should be made by experienced, licensed operators following any and all legal requirements and best practices.
- The use of poisonous rodent bait within the facility should not occur. If this use is required, then the area that is being trapped should have all the product and packaging removed prior to the use of the poisonous baits.

Minor deficiency: (7 points) if:

- Single/isolated instance(s) of improperly positioning or maintaining electrical fly traps or insect light traps.
- Single/isolated instance(s) of a fly swatter found in production or storage area.
- Single/isolated instance(s) of grain or pellet baits being used in an outside bait station (external trap).
- Single can of fly spray (or other insecticide) found in the production/storage areas (including chemical/sanitation storage).
- Snap traps being used outside the operation (not presenting risk to product or packaging) and are lacking daily inspection logs or being used for routine monitoring (as opposed to short term eradication).
- Single/isolated instance(s) of any other issues noted on the compliance criteria.

Major deficiency (3 points) if:

- Numerous instances of improperly positioning or maintaining electrical fly traps or insect light traps.
- Numerous instances fly swatters found in production or storage area.
- Numerous instances of grain or pellet bait being used in an outside bait station (external trap).
- More than one can of fly spray (or other insecticide) found in the production/storage areas (including chemical/sanitation storage).
- Single instance of bait/poison inside the facility (inside of a trap).
- Single instance of bait/poison found outside of a trap, outside the facility.
- Single/isolated instances (up to three snap traps) being used inside the operation and are lacking daily inspection logs or being used for routine monitoring (as opposed to short term eradication).
- Snap traps being used for a short term eradication process with daily inspection logs but using an allergenic bait.
- Numerous instance(s) of any other issues noted on the compliance criteria.

Non-compliance (0 points) if:

- More than one instance of bait/poison inside the facility (inside of a trap).
- Single instance of bait/poison inside the facility (outside of a trap).
- More than one instance of bait/poison found outside of a trap, outside the facility.
- More than one major deficiency
- Numerous (more than three snap traps) being used inside the operation and are lacking daily inspection logs or being used for routine monitoring (as opposed to short term eradication).
- **Any observation of contamination of product or product contact material (this qualifies for an automatic failure and applies under 2.17.01 and/or 2.17.02.**

2.17.07: Are pest control devices maintained in a clean and intact condition and marked as monitored (or bar code scanned) on a regular basis?

Total compliance (5 points): The following criteria are met:

- If non-toxic glue boards are used, they should be located inside a trap box or PVC piping, etc., and changed frequently ensuring that the surface has a shiny glaze with no build-up of dust or debris.
- If cardboard traps are used (interior and dry areas only) they should be in good repair and marked as monitored (see below).
- If mechanical wind-up traps are used, they should be wound. Winding is checked by triggering the spring device to operate the trap. The trap should be rewound after testing.
- Approximately 10% of the traps, glue boards and bait stations should be checked by the auditor.
- Record of service verification such as stickers, cards or bar codes should be on the inside of the station and on bottom of glue boards requiring the station to be opened to record data (date and initial of inspector) or to scan. External labeling is allowed on traps with a clear window on top.
- Bait and other poisons should be controlled and applied by a licensed applicator (see 2.26.01).

- Bait in bait stations should be secured inside the bait station on a rod above the floor of the station, or the bait station is designed so bait cannot be removed by a rodent or “float away” in a heavy rain. Bait stations should be tamper resistant. A key should be made available at the time of the audit.
- No bait stations should be missing entire bait.
- No old or moldy bait observed.
- Bait stations and traps should not be fouled with weeds, dirt, and other debris.
- External pest control devices should be checked at least monthly (checking more frequently is an ideal situation) – these checks to be recorded.
- Internal pest control devices should be checked at least every two weeks (checking more frequently is an ideal situation) – these checks to be recorded.
- Any supplemental snap traps inside stations should be checked and recorded weekly.

Local regulations may require exceptions/differences to above guidelines. At all times, local regulations should be met but if the audit system requirements are more stringent, these should also be adhered to. Some contractors use barcode systems that automatically check to see if all traps are monitored on a scheduled visit.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of traps, bait stations and glue boards not working properly or adequately maintained (check cards, cleanliness, etc.)
- Single/isolated instance(s) of unsecured bait inside bait stations.
- Single/isolated instance(s) of bait stations having moldy bait.
- Single/isolated instance(s) of any other issues noted on the compliance criteria.

Major deficiency (1 point) if:

- Numerous instances of traps, bait stations or glue boards not working properly or adequately maintained (check cards, cleanliness, etc.)
- Numerous instances of unsecured bait inside bait station.
- Numerous instances of bait stations having moldy bait.
- Numerous instance(s) of any other issues noted on the compliance criteria.

2.17.08: Are interior and exterior building perimeter pest control devices adequate in number and location?

Total compliance (5 points): As a **guide** (i.e. not expecting the use of tape measures) to number and placement of traps and bait stations:

- Multiple catch traps or glue boards in stations or PVC pipes should be positioned between 20 to 40 feet (6 to 12 meters) intervals around the inside perimeter of all rooms. Spacing might be affected by the structure, storage and types activities occurring.
- Multiple-catch traps may be **supplemented** with snap traps in stations if necessary in certain areas (e.g., in areas with high dust levels (e.g., potatoes, onions)) or box mezzanines where large traps or glue boards are not practical.
- Inside the facility, traps should be placed within 6 feet (about 2 meters) of both sides of all outside exit/entry doors. This includes either side of the pedestrian doors. Effort should be made to avoid placing traps on curbing.
- Trapping inside Cold Storage and Cooler operations is mandatory. Trapping inside cold rooms within packinghouse and processors is recommended, but it is left to the auditors discretion to review the risks (doors that open to the outside, proofing issues, potential for rodents to be harbored in the materials being stored).
- Bait stations or live traps should be positioned between 25 to 75 feet (8-23 meters) intervals around the exterior of the building perimeter and within 6 feet (about 2 meters) of both sides of all outside exit/entry doors, except where there is public access (public access is defined as access easily gained by the general public such as parking lots or sidewalks, school areas or areas of

environmental concern). Trap placement might be affected by the structure, external storage and type of area (urban, rural etc.).

- Bait stations (where used) should be positioned within 50 feet (15 m) of structures. This may impact fence line/property boundary baiting i.e. bait stations must be within 50 feet (15 m) of buildings and at 50-100 feet (15-30 m) intervals. If an exterior fence line/property perimeter program is utilized at distances greater than 100 feet (30 m) from buildings, then non-bait traps (e.g. live traps) should be positioned at 100-200 feet (30-61 m) intervals along perimeter. Auditor should check label for bait and ensure compliance to distance requirements on label.
- Outside packaging and any outside food storage should be protected by an adequate number of pest control devices.

<http://www.epa.gov/oppsrrd1/reregistration/rodenticides/finalriskdecision.htm>

http://www.npmapestworld.org/documents/Foodplantstandards2010_000.pdf

<http://www.npmapestworld.org/docs/ePestWorld/Response%20to%20ASPCRO%20March%202012.PDF>

Minor deficiency (3 points) if:

- Single/isolated instance(s) of traps positioned at longer intervals than mentioned above.
- Single/isolated instance(s) of traps missing or not within 6 feet (about 2 meters) of exit/entry doors.
- No bait stations along facility property fence line (auditor discretion on necessity for fence line trapping).
- Traps not located in a single area that should be trapped e.g. coolers (see text above), break area, etc.

Major deficiency (1 point) if:

- Numerous instances of bait stations positioned at longer intervals than mentioned above.
- Numerous instances of traps missing or not within 6 feet (about 2 meters) of exit/entry doors.
- Traps not located in more than one area that should be trapped e.g. packing areas and coolers, building perimeters (see text above).
- No exterior traps.

Non-compliance (0 points) if:

- Trap positioning is such that the number of traps is nowhere near adequate in terms of spacing and coverage of entry points, e.g. one or two traps to cover a large production area.
- Traps not located in numerous areas that should be trapped e.g. packing areas and coolers (see text above).

2.17.09: Are all pest control devices identified by a number or other code (e.g. barcode)?

Total compliance (5 points): The devices are numbered and a coding system is in place to identify the type of device on a map. Auditor should check that the trap map numbering and trap positions, match reality. All internal traps should be located with a wall sign (that states the trap number and that it is a trap identifier), in case they are moved.

Minor deficiency (3 points) if:

- Single/isolated instance(s) pest control devices having no visible numbers on them or on the station location.
- Single/isolated instance(s) of missing wall signs.
- Wall signs are not unique i.e. not clear that they are trap identifiers e.g. just a number.

Major deficiency (1 point) if:

- The devices are marked on the map but the devices themselves are not numbered or the numbering sequence is incorrect.
- Numerous instances of pest control devices having no visible numbers on them or the station location
- Numerous instances of missing wall signs.

Non-compliance (0 points) if:

- None of the devices are numbered.

2.17.10: Are all pest control devices properly installed and secured?

Total compliance (5 points): Bait stations should be secured to minimize movement of the device and be tamper resistant. Bait stations should be secured with a ground rod, chain, cable or wire, or glued to the wall/ground, or secured with a patio stone (wall signs are required if using patio stones) to prevent the bait from being removed by shaking, washed away, etc. Bait stations should be tamper resistant through the use of screws, latches, locks, or by other effective means. Note – only traps containing bait are required to be secured. Live traps used indoors are not required to be secured to the ground; auditee may use metal “sleeves” or similar solutions to prevent displacement, crushing by forklifts, etc. Live traps should be positioned so that the openings are parallel with and closest to the wall. Glue boards should be inside a device (e.g. trap box, PVC pipe, etc.) rather than loose on the floor. Auditor discretion applies to traps placed on curbing.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of bait stations not being secured.
- Single/isolated instance(s) of devices “out of position”
- Lacking wall signs for external traps that are secured to a patio block.

Major deficiency (1 point) if:

- Numerous instances of bait stations not being secured.
- Numerous instances of devices “out of position”

Non-compliance (0 points) if:

- Systematic failure to secure bait stations.
- Systematic failure to properly position interior traps.

Storage Areas & Packaging Materials

2.18.01: Are ingredients (including ice), products, and packaging stored to prevent cross contamination (this includes iced product pallets stored above pallets of product without adequate protection as well any allergen cross contamination issues)?

Total compliance (15 points): All ingredients, products and packaging should be stored off the ground (i.e. on racks, pallets, shelves, etc.). Materials should be properly protected during storage to prevent contamination. Raw materials, finished product and packaging materials should be stored in separate areas to prevent cross contamination. When separate room storage is not possible, the auditor should assess the risks especially with respect to cross contamination. When assessing raw contamination of finished goods, the auditor should assess the level of risk e.g. how “processed” are the finished goods, what kind of packaging is used etc. Raw unprocessed items should not be able to contaminate finished washed/processed items. Packaging storage, especially dust from cardboard storage should not contaminate produce items. If mixed food items are stored on site then there should be controls to prevent contamination issues e.g. raw eggs should not be stored above raw produce, glass items should be kept in a separated area and always stored near ground level. Wet product is not stored above product – this especially important where iced product is being stored in conditions where the ice is thawing and dripping. Ice should be manufactured, stored and handled in a manner that eliminates contamination issues; attention to ice tools and how salt for ice making is being stored and handled. Condensate is scored in 2.24.05.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of products or packaging materials stored on the floor or not protected properly.

- Single instance of a pallet or boxes/bags of finished product stored too close to raw product or ingredients.
- Single instance of ice/water dripping from above pallet onto unprotected product underneath.
- Single instance of improper ice storage or handling practices.

Major deficiency (5 points) if:

- Numerous instances of products or packaging materials not protected properly.
- Numerous instances of products or packaging materials stored directly on the ground.
- Isolated instances (no more than three) of raw product or ingredients stored in the same room as bagged/boxed finished product where there is not adequate physical separation and demarcation within the room, i.e. potential risk of raw and processed finished goods cross contamination.
- More than one but less than three instances of ice/water dripping from above pallet onto unprotected product underneath but with no signs of product adulteration.
- More than one but less than three instances of improper ice storage handling practices

Non-compliance (0 points) if:

- Different food items being stored together in a way that poses a cross contamination risk.
- Systematic storage of product or packaging materials directly on the ground.
- Numerous instances of raw product or ingredients and bagged/boxed finished product stored in the same room without adequate segregation; high risk raw and processed finished goods cross contaminating.
- More than three instances of ice/water dripping from above pallet onto unprotected product underneath but with no signs of product adulteration.
- More than three instances of improper ice storage or handling practices.
- **Any signs of product adulteration from poor storage practices – see 2.18.05, automatic failure due to product contamination.**

2.18.02: Is the storage area completely enclosed?

Total compliance (10 points): To protect the product and packaging materials from the elements and pests, it is necessary to keep the storage area enclosed and pest proof. Main doors should be kept closed unless in use. Food contact packaging should not be stored outside. Non-food contact packaging e.g. cardboard outers should be stored inside if possible. If some non-food contact packaging is stored outside, then this outside storage area should be included in the pest control program. Outside stored, non-food materials should be covered with a waterproof and dust proof shroud (often made of plastic material).

Minor deficiency (7 points) if:

- Single/isolated instance(s) of a door left open.
- Non-food contact packaging is stored outside, with shroud and storage area is included in the pest control program.

Major deficiency (3 points) if:

- Open areas in the ceiling/roof.
- Food contact packaging is stored outside (even if covered with shroud).
- Non-food contact packaging stored outside but not included in the pest control program and/or is not shrouded.
- Numerous instances of doors left open.
- Storage area is open on one to three sides.

Non-compliance (0 points) if:

- Products and ingredients are stored outside (even if shrouded)
- Storage area has roof but no walls.
- Food contact packaging items are stored outside, without shrouds.

2.18.03: Is the facility's use restricted to the storage of food products?

Total compliance (5 points): Only food, food contact products and items related to the process are stored in the facility's storage areas. Sanitation chemicals and maintenance equipment storage should have their own dedicated storage areas away from food and related items.

Minor deficiency (3 points) if:

- Single/isolated instance(s) storage of non-food items in areas that are used for storing raw material food items, packaging or finished products.

Major deficiency (1 point) if:

- Numerous instances storage of non-food items in areas that are used for storing raw material food items, packaging or finished products.

Non-compliance (0 points) if:

- Systematic storage of non-food items in areas that are used for storing raw material food items, packaging or finished products.

2.18.04: Are rejected or on hold materials clearly identified and separated from other materials?

Total compliance (10 points): All raw materials, work in progress, ingredients, finished goods or packaging that are being rejected or are awaiting final disposition (on hold) should be stored in a designated hold area, in a way that avoids accidental use of these materials in the production process (unless they have been cleared for use). Materials should be stored in a way that avoids accidental use of these materials in the production process (unless they have been cleared for use). The rejected or on hold items should be tagged as such, with a date showing when the product was placed on hold/rejected and the reason for being on hold/rejected and the name of the person who put the product on hold. The tagged product should not be commingled with other goods in such a way that their disposition is not clear. There should also be records of items placed on hold (e.g. an on hold/disposition log) available for review (scored in 1.05.01).

Minor deficiency (7 points) if:

- Single/isolated instance(s) of items on hold or rejected, in a designated area but the items are not being clearly labeled as such (with the required label tag details).

Major deficiency (3 points) if:

- Numerous instances of items on hold or rejected, in a designated area but the items are not being clearly labeled as such (with the required label tag details).
- On hold/rejected items are commingled with other goods in such a way that their status is unclear and a potential misuse might occur.

Non-compliance (0 points) if:

- Rejected or on hold products are not clearly separated and identified.

2.18.05: Are raw products, work in progress, ingredients (including ice), finished goods and food contact packaging within accepted tolerances for spoilage or adulteration? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.

Total compliance (15 points): Raw products, work in progress, ingredients, finished goods, food contact packaging and food contact surfaces should be free from spoilage, adulteration and/or gross contamination (21 CFR 110.3g). If legislation exists, then the contamination should be viewed against this legislation e.g., USDA Grading Standards often include decay tolerances. Spoilage or adulteration would include any physical, chemical or biological contamination including bodily fluids. This question is designed to allow an auditor to halt an audit when finding gross contamination issues (note pests are

covered by 2.17.01 and 2.17.02). Examples might include glass, trash/litter, motor oil in products, etc. Where an issue is observed by an operator in the normal process, auditor should observe the actions of the operator before scoring. Auditors should use their discretion and decide whether the frequency of the contamination warrants an automatic failure.

Examples include pieces of glass, one piece of rodent bait, paint on product or packaging, flakes of rust, etc. Is the issue systematic or a one-off issue? There is no adulteration of ice permitted. Water used for ice for product cooling should be potable. Ensure that ice production and storage areas are inspected. Water directly sourced from rivers, canals, ponds, etc., (i.e. surface water) used to cool, wash, make ice or other product contact use without proper treatment i.e. filtration and/or anti-microbial treatment and proper testing (see 2.30.03) is not considered potable (US EPA drinking water **microbiological** specification (chemical if appropriate) <http://www.epa.gov/safewater/mcl.html#mcls> and for the purposes of this audit is considered to be adulterated. Use of waste process discharge water from a surface source (e.g. discharged into a pond then re-used as process water) should not be considered suitable for product contact use and for the purposes of this audit is considered to be adulterated.

FDA/ORA compliance Policy Guide 555.425, <http://www.fda.gov/ohrms/dockets/98fr/990463gd.pdf>

US FDA/CFSAN Defect Levels Handbook, The Food Defect Action Levels

<http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/sanitationtransportation/ucm056174.htm>

US EPA Water Quality Standards for Coastal and Great Lakes Recreation Waters

<http://www.epa.gov/EPA-WATER/2004/November/Day-16/w25303.htm>

Minor deficiency (10 points) if:

- There is no minor deficiency category for this question

Major deficiency (5 points) if:

- There is no major deficiency category for this question.

Automatic Failure (0 points) if:

- **Numerous incidences of spoilage or adulteration of either ice or product.**
- **There is a single gross incidence of evidence of unacceptable limits of spoilage or adulteration in raw materials, work in progress, finished goods, packaging or ingredients, including ice.**
- **Untreated surface water or process discharge water from a surface source is used to cool, wash, produce ice for product contact use or any other method of product contact use.**

2.18.06: Are all storage areas clean, especially the racking structures, lights, ceilings, floor areas by the walls and other hard to reach areas?

Total compliance (10 points): All storage areas should be clean and well ventilated and protected from condensation, sewage, dust, dirt, toxic chemicals or other contaminants. Ledges should be free of debris and clean. Stored products and packaging should be clean and free from dust, debris and out of place materials, etc. Inside light covers should be clean, free of algae, insects and excessive dirt. Pay special attention to the corners of the stores, girder areas, racking structures and spaces between walls and racking structures.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of floors, walls, ledges, racking and/or ceilings being dirty.
- Single/isolated instance(s) of ingredients and packaging with dust, debris, etc.
- Single/isolated instance(s) of dirty lights/light covers.

Major deficiency (3 points) if:

- Numerous instances of floors, walls, ledges, and/or ceilings being dirty.
- Numerous instances of ingredients and packaging with dust, debris, etc.

- Numerous instances of dirty lights/light covers.

Non-compliance (0 points) if:

- Storage areas are very dirty – little or no evidence of cleaning occurring.
- Systematic failure to maintain lights/light covers in a clean condition.

2.18.07: Are materials (commodities, packaging, ingredients, processing aids, work in progress, etc.) properly marked with rotation codes (receipt dates, manufacture dates, etc.)?

Total compliance (5 points): All materials should be properly marked with receipt dates and/or tracking information (lot numbers, code dating) for traceability/recall and stock rotation purposes. Finished product coding should consider any specific customer requirements e.g. as per customer specifications, customer expectation requirements. Coding on raw and finished product should also consider any local or national laws where they exist.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of missing receipt dates and/or tracking information on commodities, packaging, ingredients, processing aids, work in progress, etc.
- Packaging missing receipt dates and/or tracking information.

Major deficiency (1 point) if:

- Numerous instances of missing receipt dates and/or tracking information on commodities, packaging, ingredients, processing aids, work in progress, etc.

Non-compliance (0 points) if:

- There are no receipt dates and/or tracking information on commodities, packaging, ingredients, processing aids, work in progress, etc.

2.18.08: Are materials (commodities, packaging, ingredients, processing aids, work in progress, etc.) rotated using FIFO policy?

Total compliance (5 points): All materials are rotated using FIFO (First In First Out) policy to ensure items are used in the correct order they are received and within their allocated shelf life (this does not apply to commodities that undergo ripening treatments or where rotation is dictated by the initial quality inspection). Packaging rotation might be affected by market forces. Having a “Just In Time” ordering policy and thereby having very limited stock volumes, is acceptable as a replacement for FIFO if it can be proven e.g. the auditor can see that hardly any stock is maintained. “Just In Time” ordering policy does not replace the need to tag materials as per question 2.18.07.

Minor deficiency (3 points) if:

- Single/isolated instance(s) where commodities, packaging, ingredients, processing aids, work in progress, etc. are not rotated using FIFO policy.
- Packaging is not being rotated using FIFO policy.

Major deficiency (1 point) if:

- Numerous instances where commodities, packaging, ingredients, processing aids, work in progress, etc. are not rotated using FIFO policy.

Non-compliance (0 points) if:

- Systematic failure to use FIFO policy on commodities, packaging, ingredients, processing aids, work in progress, etc.

2.18.09: Are storage areas at the appropriate temperatures for the specific products being stored?

Total compliance (10 points). All products should be stored at the correct temperatures. Products should be stored in separate chambers if they require different optimum storage temperatures. Check the area/chamber thermometers and thermostats and compare the reading against the types of products being stored in the area.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of product being stored in areas which are set at the wrong temperature.

Major deficiency (3 points) if:

- Numerous instances of product being stored in areas which are set at the wrong temperature.

Non-compliance (0 points) if:

- Systematic failure to store products at the right temperatures i.e. place the products in the correct storage areas (relative to storage area temperatures).
- Storage room temperature regimes are incompatible with the types of products being stored.

Operational Practices

2.19.01: Does the process flow, facility layout, worker control, utensil control, internal vehicle use, etc. ensure that finished (processed) products are not contaminated by raw (unprocessed) products?

Total compliance (15 Points): Raw products should not come into contact with processed products, especially processed products that have been washed, cut or thermally treated. There should be plenty of space and separation to help avoid cross contamination issues. Workers who handle raw products should not then handle processed products without first ensuring that they are free of raw material contaminants. This should include hand washing, glove change etc., but might also include changing into a new set of garments; ideally workers should be dedicated to handling raw or processed goods, but not both within a shift. Utensils, cleaning implements, internal vehicles etc. should not be allowed to be vectors for cross contamination; ideally dedicated coded equipment should be provided for raw and processed goods. Failing this, there should be equipment sanitation steps between uses. Anti-microbial washes (often found in fresh cut operation) are not kill steps with respect to products, though they do reduce microbial loading when properly maintained.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of worker/utensil/internal vehicle cross contamination.
- Minor process issues where processed materials come into the same area raw materials, but the two products do not touch in any way, i.e. no potential risk of cross contamination.
- Some potential space issues where the process flow is being forced to bring finished and raw material into close proximity.

Major deficiency (5 points) if:

- Numerous instances of worker/utensil cross contamination.
- Serious process flow issues where raw material can potentially cross contaminate finished goods.
- Numerous space issues where the process flow is being forced to bring finished and raw material into close proximity.

Non-compliance (0 points) if:

- Systematic instances/issues with worker and/or utensil cross contamination.
- Process flow issues are observed to result in product raw/finished goods cross contamination.

2.19.02: Are all exposed materials (product, packaging, etc.) protected from overhead contamination (e.g. ladders, motors, condensation, lubricants, walkways, loose panels, degrading insulation, etc.)?

Total compliance (15 points): Ceilings and/or any overhead fixtures above lines and storage are free from condensation or dust. Ladders or walkways (catwalks) above exposed product or packaging material have kick plates at least three inches high and are covered in some way that protects the product underneath. Drips or condensate (e.g. from fixtures, ducts, pipes, etc.) should not contaminate food, food contact surfaces or packaging material; adequate measures should be in place to protect from condensate. Condensate is scored in 2.24.05.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of possible overhead contamination.

Major deficiency (5 points) if:

- Numerous instances of possible overhead contamination

Non-compliance (0 points) if:

- No protective devices have been installed to eliminate potential contamination.
- **Any observation of direct contamination of raw materials, work in progress, finished product, ingredient or packaging materials. In this case the score reverts back to 2.18.05.**

2.19.03: Are packing and/or processing areas completely enclosed?

Total compliance (15 points): Production/packing areas should all be inside the facility i.e. enclosed (walls and roof) with doors either closed or pest protected in some e.g. strip curtains, air curtains, speed doors, etc. Walls can be solid, fine mesh or any other pest proof material, with openings that should be no greater than 1/8 inch (3 mm) or smaller. Dust and pest proof wall materials are required for processing operations. Production/packing should also be physically separated from storage areas. In some cases a physical barrier between production/packing and storage areas might be required – this will depend on the type of product being produced and the items being stored. For example, cardboard should not be stored in a fresh-cut-processing area. Another example would be storing raw material near where finished fresh-cut product is being stored.

Minor deficiency (10 points) if:

- Production/packing areas are not sufficiently separated from storage areas. There is not a threat of product or packaging contamination.
- Single incident of an open door being left open that is not meshed or fitted with air curtain.

Major deficiency (5 points) if:

- Production/packing areas are not sufficiently separated from storage areas. There may be a threat to product or packaging.
- Numerous incidents of open doors that are being left open and not meshed or fitted with air curtain.
- One or more open walls (with no proofing), but with a proper roof and floor.

Non-compliance (0 points): if one of the following:

- Production/packing area is outside or in an open sided building.
- Production/packing areas are sufficiently not separated from storage areas. There may be a threat to product or packaging from a serious food safety threatening contaminant.
- No roofing (either with or without open walls).

2.19.04: Are production areas clean and well maintained; especially lights, floor areas by the wall and equipment, and other hard to reach areas?

Total compliance (15 points): Production areas should be maintained in a clean and sanitary state. Auditors should check the ceilings, lights, corners, against walls and alongside equipment (look up, look down, look all around). This question is designed to capture any hygiene issues that are not covered by specific issues noted in other questions. This question is the sister question to 2.18.06 which asks about storage area hygiene. Auditors should carefully note which areas are dirty when down scoring in this

question. This question does not occur in the Storage and Distribution audits, or in the Cooling and Cold Storage audits.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of floors, walls, ledges or other areas being unclean.
- Single/isolated instance(s) of dirty lights/light covers.

Major deficiency (5 points) if:

- Numerous instances of floors, walls, ledges or other areas being unclean.
- Numerous instances of dirty lights/light covers.

Non-compliance (0 points) if:

- Production areas very dirty – little or no evidence of cleaning occurring.
- Systematic failure to maintain lights/light covers in a clean condition.

2.19.05: Is all re-work / re-packaging handled correctly?

Total compliance (10 points): Rework includes product that has come directly from the end of the line or where possible, product that has been returned from a customer (but is still in good quality). Rework possibilities will vary from product to product. Re-work areas in coolers should adhere to all required GMP's. In a cooler or storage and distribution center where the re-packing is routine i.e. a regular activity (more than once per week) as opposed to an occasional unscheduled event, then a packinghouse audit template should be used. All re-work should be handled correctly:

- Whole products undergoing re-packing should be in new final boxes and not be commingled with products from other producers and/or lots. Re-use of boxes in tomato, citrus, etc. re-pack operations is permitted only if product is re-packed into a container from the same lot of product and that the container is clean, sanitary and properly labeled. Any misuse of single use containers is scored in 2.19.14.
- Packaging items are opened with clean knives.
- Workers emptying packaging should have washed their hands and (ideally) if company policy, wear clean gloves i.e. should follow company GMP rules for hand sanitation.
- Re-work area is separated from the main production line.
- Product is collected in a clearly designated container before being transferred back to the processing line; ideally product should go through the washing step again.
- Outside of packaging does not touch the re-work product as it is being emptied.
- The traceback details are transferred correctly.

Not applicable if there is no re-work/re-packing taking place.

Minor deficiency (7 points) if:

- One of the items above is not being followed.

Major deficiency (3 points) if:

- Two items above are not being followed.

Non-compliance (0 points) if:

- Three or more of the items above are not being followed.

2.19.06: Are raw ingredients examined before use?

Total compliance (5 points): Raw ingredients/products are examined for damage, insect or rodent infestation, foreign materials, rot and decay, temperature abuse, tampering evidences e.g. broken seals, visible residues, etc. before use. (Produce that is cored and outer leaves are removed also qualifies as inspected, e.g. lettuce). Visual inspection on conveyor inspection belts is acceptable.

Minor deficiency (3 points) if:

- Single raw material is not examined prior to use.

Major deficiency (1 point) if:

- Numerous raw materials are not being examined prior to use.

Non-compliance (0 points) if:

- No raw materials are examined before use.

2.19.07: Are finished products coded (carton and unit packaging) for the day of production and displaying information to enable proper storage and use of the product within the food supply chain?

Total compliance (10 points): All products are appropriately labeled, identified and possess lot numbers and/or code dating information that can be used for traceback and recall purposes. Packaging labelling should include information about recommended storage conditions and usage. On bulk product, the coding should be identified on the carton or RPC tag; on bagged, clamshells and other pre-packs, the coding should be on the pack itself and also the cartons. Auditee should have records linking the code(s) used to date of production/packing (see 1.07.01).

Auditor should check that product specifications (1.06.01) are being followed as required regarding date coding. For example, some buyers do not consider Julian date codes to be “readable” and require unencoded date information on the packaging e.g. pack date, sell-by date, use-by date information.

21 CFR Parts 1 and 11 <http://www.fda.gov/OHRMS/DOCKETS/98fr/04-26929.htm>

US Bioterrorism Act <http://www.fda.gov/regulatoryinformation/legislation/ucm148797.htm>

Produce Traceability Initiative <http://www.producetraceability.org/>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of a product not having accurate or readable lot or date code information.
- Single/isolated instance(s) of date coding not matching specification requirements.
- Single/isolated instance(s) of codes on unit packs not matching codes on cartons.
- Bags not being coded, but the cartons are coded and the business is majority bulk packing as opposed to pre-packing (e.g. bags).

Major deficiency (3 points) if:

- Numerous products not having accurate or readable lot or date code information.
- Numerous instances of date coding not matching specification requirements.
- Numerous instances of codes of unit packs not matching codes on cartons.
- Bags not being coded, but the cartons are coded and the business only packs small amounts of bulk product as opposed to pre-packing (e.g. bags).
- Coding pallets only.

Non-compliance (0 points) if:

- No product lot coding and/or code dating either on bags, pre-pack or cartons on the majority of lines.
- Systematic failure for date coding to meet required specifications.

2.19.08: Are foreign material control methods (e.g. metal detectors, metal traps, visual inspection, etc.) in place? Are these systems regularly tested (where relevant) to ensure proper operation?

Total compliance (10 points): Foreign material control method(s) are in place. Discovery of foreign material issues should be recorded along with relevant corrective actions (might be recorded in the Unusual Incidents Log). Where necessary, foreign material control systems should be tested to ensure they are operating properly. The frequency and types of testing are established in a written program and the frequency is adhered to by QA personnel and documented. Foreign material controls include

detectors, traps, visual, sieves, filters and magnets. Also check that the rejection system/mechanism is being tested as well e.g. rejection arm timing, alarm system, etc. Continuous visual inspection is acceptable for whole products. Metal detection should be used for products that have been cut/sliced using an automated cutting machine e.g. a slicer or a shredder. Metal detectors should be tested at least hourly. At least ferrous, non-ferrous and stainless steel (usually 316) test pieces should be used separately to test the metal detectors – other specific metal test pieces should be considered if the plant equipment is made out of other materials. Where available, customer specifications should be used. Test pieces should be placed as close to the aperture center as possible; embedding test pieces in the product is an ideal method. Discovery of foreign material issues should be recorded along with relevant corrective actions. The auditor should have the auditee check metal detector(s) sensitivity while touring the facility.

OSU Metal Detectors for Food Processing,

<http://pods.dasnr.okstate.edu/docushare/dsweb/Get/Document-964/FAPC-105web.pdf>

A Guide to Metal Detection in the Food Manufacturing Industry

http://www.loma.com/docs/Guide_to_Metal_Detection.pdf

Minor deficiency (7 points) if:

- Single instance of a processing/packing line in operation missing a form of foreign material control method if there are more than two processing/packing lines in operation.
- Single/isolated instance(s) of failure to adhere to established frequency of testing device(s).
- Single/ isolated instance(s) of not using the correct testing methodology.
- Testing frequency for metal detectors is at least every two hours but not at least every hour.
- Single instance of a detector failing a check or not operating properly.
- Not using one of the required test pieces (metal detection).

Major deficiency (3 points) if:

- Isolated instances (two-three) of processing/packing line in operation missing a form of foreign material control method if there are more than three processing/packing lines in operation.
- Numerous instances of failure to adhere to established frequency of testing device(s).
- Numerous instances of not using the correct testing methodology.
- Testing frequency for metal detectors is at least every four hours but not at least every two hours.
- More than one instance of a detector failing a check or not operating properly.
- Not using two of the required test pieces (metal detection).

Non-compliance (0 points) if:

- Majority of processing/packing line in operation missing a form of foreign material control method if there are more than three processing/packing lines in operation.
- No foreign material control methods are in place (cut product).
- No established program that specifies the frequency of device testing is in place.
- No established testing methodologies.
- Testing frequency for metal detectors is not at least every four hours.
- No detectors operating properly. If only one detector is used and it is malfunctioning score non-compliance.
- Not using three of the required test pieces (metal detection).

2.19.09: Does the facility use the appropriate test strips, test kits or test probes for verifying the concentrations of anti-microbial chemicals (product washing water, terminal sanitizers, dip stations, etc.) being used and are they in operational condition?

Total compliance (10 points): The strength of anti-microbial chemicals (product and cleaning) should be checked using an appropriate method for the anti-microbial in use e.g. chemical reaction based test, test probe, ORP meter or as recommended by disinfectant supplier. Any water treatment at source (e.g. well, canal) should be monitored. Solutions that are too weak will be ineffective, while those too strong may be harmful to workers or product. Where necessary, pH of solutions should also be checked. Methods

include, dip sticks, test strip papers, conductivity meters, titration, color comparison methods e.g. tintometers, etc. All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly (especially light and temperature sensitive materials). If the ORP meter controls the pumps that are injecting the anti-microbial and/or buffer, there should be an independent calibrated ORP probe or other method (e.g. ppm test strip papers) in order to verify injector readings. Probe sensors need periodic cleaning and calibration and may become temporarily saturated by over-injection of anti-microbial or buffer. The auditor should have the auditee check the strength of anti-microbial chemicals while touring the facility.

http://ucanr.edu/sites/GAP/Using_Oxidation_Reduction_Potential_ORP/
<http://ucfoodsafety.ucdavis.edu/files/26414.pdf>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of a method not being used correctly.
- Single/isolated instance(s) of a testing procedure being used that is not appropriate for the concentration and/or sanitizer in use.
- Single/isolated instance(s) of out of date verifying chemicals being used.

Major deficiency (3 points) if:

- Numerous instances of a method not being used correctly.
- Numerous instances of a testing procedure being used that is not appropriate for the concentration and/or chemical in use.
- Numerous instances of out of date verifying chemicals being used.
- ORP meter used to control pumps injecting anti-microbial and or/buffer without an independent probe or other method to verify readings.

Non-compliance (0 points) if:

- Chemical concentrations are not monitored.
- Equipment to monitor anti-microbial chemical concentrations is not available or is not being used correctly.

2.19.10: Are hand washing stations adequate in number, appropriate in location, in working order, have warm water and adequately stocked (e.g. disposable towels, **unscented soap, etc.)?**

Total compliance (15 points): To ensure efficient worker flow there should be a minimum of one hand wash station for every ten people. Hand washing stations should be located at access to production areas in processing and packinghouse audits and in, or immediately adjacent to toilet facilities. Within close proximity of/at toilet facilities area and lunchroom area is acceptable for other facility audits. Hand washing facilities should be used only for hand washing (no storage, food handling, etc.). Hand washing stations should be properly stocked with liquid **unscented**, neutral or “medicinal” scented soap; scent should rinse away with the foam leaving no lingering fragrance on hands. Single use paper towels should be used and units properly located; hot air driers are acceptable if properly located (hot air driers should not be located within production areas since they create aerosols). There should be an adequate stock of soap and paper towels. Hand washing stations should be maintained in good working order with proper drainage and warm water (> 100 °F, 38 °C) available for use. Discharge water from sinks should not run directly onto the floor. Care should be taken to ensure that hand wash water temperatures are not too hot when using pre-set mixer faucets (taps). Hands-free operations are an optimum system for food establishments. Cleanliness of hand wash stations is scored in 2.23.10.

United States Department of Labor 29 CFR 1910.141(c)(1)(i): Toilet Facilities
http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9790

Minor deficiency (10 points) if:

- Only about 75% of needed hand washing stations are present.
- Single/isolated instance(s) of hand washing stations not in working order.

- Only cold water is available at hand washing stations
- Only about 75% of hand washing stations have warm water or the water is too hot.
- There are no hand washing stations located in visible production entry areas (processing and packinghouse only) where the worker hand washing practices can be monitored.
- Single/isolated instance(s) of soap with a lingering fragrance being used.

Major deficiency (5 points) if:

- Only about 50% of needed hand washing stations are present.
- Numerous instances of hand washing stations not in working order.
- Only about 50% of hand washing stations have warm water or the water is too hot.
- Numerous instances or systematic use of soap with a lingering fragrance being used.
- Using terry cloth re-useable towels or roller towels.
- No paper towels are provided or hot air driers are located within production areas.
- Numerous instances of hand washing stations without warm water available or where water is too hot.

Non-compliance (0 points) if:

- No soap is provided.
- Hand washing stations are inadequate in both number and location (less than 25% of the needed hand washing stations are provided).
- There are no functioning hand wash stations.

2.19.11: Are toilet facilities adequate in number and location and are they adequately stocked (e.g. toilet paper, disposable towels, **unscented soap, etc.)?**

Total compliance (15 points): Toilet facilities are adequate in number and location:

- Toilet facilities should be located within a reasonable distance from the workers' workstation.
- Toilet facilities should be readily available to male and female workers. The number of facilities provided for each sex should be based on the number of workers of that sex.
- Where there are single-occupancy rooms separate toilet rooms for each sex are not required (sufficient toilets available).
- There should be sufficient toilets for the workers. Please use this table as a guide:

Number of workers	Number of toilets
1-15	1
16-35	2
36-55	3
56-80	4
81-110	5
111-150	6
>150	1 additional toilet for each 40 workers

- Urinals for male workers should not make up more than 1/3 of the total male toilets provided.
- Each individual toilet facility should be able to be locked from inside.
- Each toilet facility should be maintained, well lighted and ventilated to outside air.
- In the toilet room, the floor and sidewalls should be watertight. The sidewalls should be watertight to a height of at least five inches.
- The floors, walls, ceiling, partitions and doors of all toilet rooms should be made of a finish that can be cleaned easily.
- Doors should not open directly into areas where food is exposed to airborne contamination, i.e. storage, processing and packing areas. Use of double doors or having a positive airflow system is accepted. In older operations, where doors to restrooms were designed to open into the production areas, i.e. not located in the amenity area or office area, the doors should be kept closed at all times e.g. use a spring loaded door.

- Toilet paper should be available to each person and stored in such a way as to prevent contamination.
- Adequate trash disposal should be available within restrooms.

United States Department of Labor 29 CFR 1910.141(c)(1)(i): Toilet Facilities

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9790

Restrooms should have hand washing facilities with:

Unscented, neutral or “medicinal” scented soap; scent should rinse away with the foam leaving no lingering fragrance on hands

- An adequate supply of **unscented** soap and paper towels.
- Proper drainage and warm water (> 100 °F, 38 °C) available for use.
- If hand washing stations within toilet facilities are the only stations provided then requirements for 2.19.10 apply.
- Cleanliness of toilet facilities is scored in 2.23.10.

Minor deficiency (10 points) if:

- One of the above criteria is not met.

Major deficiency (5 points) if:

- Two of the above criteria are not met.

Non-compliance (0 points) if:

- Failure to provide sufficient or adequate restroom facilities.
- Three of the above criteria are not met.

2.19.12: Are secondary hand sanitation stations e.g. hand dip, gel or spray stations adequate in number and location? Are the stations maintained properly?

Total compliance (3 points): In processing, packing and repackaging areas, the use of (non-perfumed) secondary hand sanitation stations is the last activity a worker performs before taking their position on the line. Secondary hand sanitation is required for fresh-cut operations and for operations producing items that may be “ready-to-eat” e.g. stone fruit, tomatoes, citrus, etc. Note that citrus peel is often used in drinks, used for zesting, etc. Secondary hand sanitation (hand dips, gels or sprays) does not replace hand washing requirements (lack surfactant qualities). Secondary hand sanitation stations should be conveniently located in traffic zones but should not be obstructive. Hand dips (if used) should contain a USDA approved food grade sanitizer at a determined concentration. Refer to hand sanitizer manufacturer label for dilutions. Hand dips should be regularly monitored (recorded anti-microbial strength checks) to ensure their effectiveness with corrective actions recorded (e.g. dip solution replenishment and anti-microbial additions). Hand gel and spray stations should be well stocked with a sanitizer approved for direct hand to food contact (e.g. USDA approved or national equivalent) and regularly monitored (recorded checks) to ensure availability with corrective actions recorded (e.g. pack replenishment); use of a refill alert type dispenser is ideal practice. Dispensers should be located a sufficient distance from production line to prevent accidental product contamination. The auditor should check that gel pack type stations are stocked and have the auditee check the strength of anti-microbial chemicals in hand dips while touring the facility. Records are scored in 2.27.05. See the [applicability chart](#).

<http://www.qualityassurancemag.com/qa0612-proper-hand-sanitation-practices.aspx>

<http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/IndustryandRegulatoryAssistanceandTrainingResources/ucm135577.htm>

<http://nelsonjameson.com/learn.php?p=hand-hygiene.html>

Minor deficiency (3 points) if:

- Single/isolated instance(s) of secondary hand sanitation stations not in place or being empty.

- Single/isolated instance(s) of hand dips containing under-strength solutions.
- Single/isolated instance of dispensers not properly located (e.g., too close to line, not conveniently located).

Major deficiency (1 point) if:

- Numerous instances of hand secondary hand sanitation stations not in place or being empty.
- Numerous instances of hand dips containing under-strength solutions.
- Numerous instances of dispensers not properly located (e.g., too close to line, not conveniently located).
- Use of hand gel or spray sanitizer that it not approved for direct hand to food contact (e.g., USDA approved or national equivalent).

Non-compliance (0 points) if:

- There are no secondary hand sanitation stations where needed or all are empty.
- All hand dips checked found containing under-strength solutions.

2.19.13: Are foot dip stations adequate in number and location? Are the stations maintained properly?

Total compliance (3 points): Foot (boot) stations (foot dip mats, baths, sprays) should be located in processing areas when crossing into a “clean” zone from an area of potential contamination e.g. from outside into the packing zone, from raw storage into packing, from bathrooms into processing etc. Foot dips should contain a USDA approved food grade sanitizer at a determined concentration. Refer to sanitizer manufacturer label for dilutions. Foot dips should be regularly monitored for volume and concentration (recorded anti-microbial strength checks) and the dip solution regularly changed to ensure their effectiveness with corrective actions recorded (e.g. dip solution replenishment and anti-microbial additions). The auditor should have the auditee check the strength of anti-microbial chemicals while touring the facility. Records are scored in 2.27.05. Foot dips are not required in packinghouses, but may be considered as an additional control. Workers should be using the foot dips as they enter the processing areas. See the [applicability chart](http://www.foodsafetymagazine.com/magazine-archive1/december-2004january-2005/the-dos-and-donts-of-food-plant-personal-hygiene-practices/).
<http://www.foodsafetymagazine.com/magazine-archive1/december-2004january-2005/the-dos-and-donts-of-food-plant-personal-hygiene-practices/>

Minor deficiency (2 points) if:

- Single/isolated instance(s) of foot dips not in place.
- Single/isolated instance(s) of the under strength foot dips or volume not maintained.
- Single/isolated instance(s) of the workers not using the foot dips.

Major deficiency (1 point) if:

- Numerous instances of foot dips not in place.
- Numerous instances of the under strength foot dips or volume not maintained.
- Numerous instance(s) of the workers not using the foot dip.

Non-compliance (0 points) if:

- No foot dip stations where needed.
- All foot dips checked being found to contain under strength solutions or volume not maintained.
- All workers avoiding using the foot dips.

2.19.14: Are single services containers used for their intended purpose only so that potential cross contamination is prevented?

Total compliance (5 points): Single service containers are used for their intended purpose only (food contact use, not to hold nuts, bolts, trash or other miscellaneous items) and should not be reused. Reuse

of boxes in tomato, citrus, etc. re-pack operations should be permitted only if product is re-packed into a container from the same lot of product and that the container is clean, sanitary and properly labeled. Returnable plastic containers (RPCs), e.g. CHEP, IFCO, should be treated like single service container and only used for product. If a single service container is used for any other reason than the storage and distribution of food it should be clearly differentiated as such e.g. painted another color and labeled.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of single service container used for other than intended purpose.
- Single instance of product repacked into a container from another lot.

Major deficiency (1 point) if:

- Numerous instance(s) of single service container used for other than intended purpose.
- More than one instance of product repacked into a container from another lot.

Non-compliance (0 points) if:

- Systematic miss-use of single services container, used for other than intended purpose.
- Numerous instances or systematic use of containers being used from different lots for repack.

2.19.15: Are re-usable containers clearly designated for the specific purpose (trash, raw product, finished product, re-work, ice, etc.) such that cross contamination is prevented?

Total compliance (5 points): Bins, boxes, hoppers, barrels, baskets, etc. used for the storage of raw materials, work in progress, ingredients, finished goods or packaging should be kept in a clean state. The storage of these items should ensure that they remain clean and uncontaminated (e.g., covered clean). In-house re-usable containers should be labeled or color-coded so that their designated purpose can be easily identified. Returnable plastic containers (RPCs) (e.g., CHEP, IFCO) should be treated like single service containers and only used for product (score in 2.19.14). If the trash container is the only re-used container on site and is a specific and unique design, so that it cannot be mistaken for another use, then should not be down scored.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of a dirty product storage container (there is no direct product contamination).
- Single/isolated instance(s) product storage container is clean, but being stored in an area where it might be contaminated and then used (e.g., a centrifuge barrel stored under an overhead production line, without proper protection).
- Single/isolated instance(s) of a re-usable container not labeled or color-coded.

Major deficiency (1 point) if:

- Numerous instances of dirty product storage containers (there is no direct product contamination).
- Numerous product storage containers, which are clean, but are being stored in an area where they might be contaminated and then used (e.g., centrifuge barrels stored under an overhead production line, without proper protection).
- Numerous instances of re-usable containers not properly labeled or color-coded.

Non-compliance (0 points) if:

- Systematic failure to not clean food storage containers.
- There is no cleaning program for the containers.
- Systematic lack of control with respect to storage of clean food storage containers.
- Re-usable containers are used for multiple purposes without the containers being labeled or color-coded.

2.19.16: Are food safety measuring devices working properly?

Total compliance (3 points). All pieces of food safety measuring equipment are working properly and where necessary calibrated. Legal requirements, manufacturer recommendations, best practice and experience of equipment drift help to determine the frequency of testing. Devices include thermometers, pH probes, ATP testing systems, etc. Metal detectors are scored in 2.19.08. The auditor should challenge some equipment by checking (or having the auditee) check the calibration of the equipment, especially if the auditor thinks the equipment might be faulty or the auditee is unsure of the equipment calibration status. Examples would include using an ice slurry for thermometers, a known pH solution for a pH probe, etc. Be sure that all calibration solutions (where used) are within "Use By" date.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of piece(s) of equipment found not to be working properly or out of calibration.
- Single/isolated instance(s) of a calibration solution in use that is past its expiration date.

Major deficiency (1 point) if:

- Numerous pieces of equipment found not to be working properly or out of calibration.
- Numerous instances of calibration solutions in use that are past their expiration dates.

Non-compliance (0 points) if:

- All equipment checked was found not to be working properly or out of calibration.
- All calibration solutions found to be past their expiration dates.

Thermometer Calibration <http://www.foodsafetymagazine.com/magazine-archive1/augustseptember-2003/a-simple-introduction-to-thermometry-and-basic-calibration/>

Worker Practices

2.20.01: Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks and whenever hands may be contaminated?

Total compliance (15 points): Worker compliance to hand washing and sanitizing procedures should be assessed. Workers are observed washing their hands before starting work each day, before and after eating, after breaks, after using the toilet, after blowing their nose and after touching anything that may be considered contaminated e.g. picking items up off of floor, etc. Auditors are expected to view hand washing disciplines – in operations where hand washing stations are not visible, this means watching worker movements after breaks (are they using the toilet facility hand wash stations); are there signs of soap and paper towel use? Hand washing is a critical part of the food suppliers' food safety program – this should be stressed to the auditee.

Potentially useful website:-

A "Safe Hands" Hand Wash Program, <http://www.hi-tm.com/Documents/Handwash-FL99.html>

Minor deficiency (10 points) if:

- Single/isolated instance(s) of a worker who is not complying with the hand washing policy.

Major deficiency (5 points) if:

- Numerous instances of workers that are not complying with the hand washing policy.

Non-compliance (0 points) if:

- Majority or systematic failure of workers to comply with hand washing policies.

2.20.02: Are workers' fingernails clean, short and if gloves are not used, free of nail polish?

Total compliance (5 points): Fingernails can harbor dirt and debris and can be a source of cross contamination; therefore nails should be clean and short to reduce the risk of cross contamination. False nails should not be worn even when gloves are worn. Use of fingernail brushes might assist in nail cleaning, however care should be taken to ensure that these brushes are kept clean and regularly replaced or they might they become a cross contamination vector.

Potentially useful website:-

Food Code,

<http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/ucm181242.htm#part2-3>
(section 2-302.11)

Minor deficiency (3 points) if:

- Single/isolated instance(s) of dirty and/or long fingernails.
- Single/isolated instance(s) of fingernail polish being worn.
- Single/isolated instance(s) of false fingernails being worn.

Major deficiency (1 point) if:

- Numerous instances of dirty and/or long fingernails.
- Numerous instances of fingernail polish being worn.
- Numerous instances of false fingernails being worn.

Non-compliance (0 points) if:

- Systematic failure to ensure that fingernails are short and clean.
- Systematic failure to ensure that fingernail polish and/or false fingernails are not worn.

2.20.03: Is there no sign of any workers with boils, sores, open wounds or exhibiting signs of foodborne illness excluded from operations involving direct and indirect food contact?

Total compliance (10 points): Workers who have exposed boils, sores, exposed infected wounds, food borne sickness or any other source of abnormal microbial contamination should not be allowed to work in contact with food, packaging or food contact surfaces. Workers should be requested to notify their supervisors if they have any concerning symptoms. All bandages should be covered with a non-porous covering such as non-latex or vinyl gloves.

Minor deficiency (There is no minor deficiency for this question).

Major deficiency (There is no major deficiency for this question).

Non-compliance (0 points) if:

One or more workers are observed working in contact with food, food contact surfaces or packaging that has or have exposed boils, sores, infected wounds, showing signs of food borne illness or any other source of abnormal microbial contamination that is a hazard.

2.20.04: Are workers wearing effective hair restraints?

Total compliance (10 points): Workers (includes maintenance workers and visitors) should be wearing appropriate hair restraints (hairnets and beard nets and moustache covers where appropriate) that fully contain all hair.

Wearing effective hair restraints is required in all operations where product is exposed, including with products that require cooking prior to consumption, i.e. potatoes and/or outer layer of commodity (rind, peel, skin, etc.) that is not consumed or used as a food item in any way (e.g., storage onions, garlic, etc.). Hair restraints are not required when there is no exposed product.

Note that citrus peel is often used in drinks, used for zesting, etc., and is viewed as edible for the purpose of this audit. Baseball caps **or head covering** are allowed in **operations** only if they are clean and worn with a hair net that is clearly visible and restrains all hair. Bobby pins, hairgrips should not be worn outside hair nets. Long hair should be tied back for safety reasons, using a band of some type (not metal clips or pins). Hair restraints should a) stop hair falling onto the product and b) prevent workers from touching their hair and then the product. See the [applicability chart](#).

21 CFR Part 110.10 <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=110.10>

Minor deficiency (7 points) if:

- Single/isolated instance(s) of personnel observed not wearing an appropriate hair restraint or not wearing them properly.
- Single/isolated instance(s) of personnel wearing bobby pins/hair grips on the outside of hair restraints.

Major deficiency (3 point) if:

- Numerous instances of personnel observed not wearing an appropriate hair restraint or not wearing them properly.
- Numerous instances of personnel wearing bobby pins/hair grips on the outside of hair restraints.

Non-compliance (0 points) if:

- The practice of wearing hairnets as an appropriate hair restraint is not enforced in an operation requiring them.
- Hairnets and/or beard-nets are not available for workers

2.20.05: Is jewelry confined to a plain wedding band?

Total compliance (3 points): Workers are not observed wearing jewelry (including earrings, necklaces, bracelets, rings with stones, rings or studs in nose, lip and eyebrow, watches) in the facility. Plain wedding bands are the only exception.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of personnel observed wearing jewelry or watches

Major deficiency (1 point) if:

- Numerous instances of personnel observed wearing jewelry or watches.

Non-compliance (0 points) if:

- Majority of workers wearing jewelry and watches i.e. jewelry policy does not exist and/or jewelry policy exists but is not being implemented.

2.20.06: Are all workers wearing outer garments suitable for the operation (e.g. smocks, aprons, sleeves, gloves)?

Total compliance (5 points): An outer garment policy is established. The policy should consider the potential cross contamination and foreign material risks. The policy should also consider customer specific requirements as well as national and local legal requirements. Suitable protective outer garments are required for workers handling processed products and washed packinghouse products (after the washing step) that are potentially ready-to-eat. Outer garments include where applicable: smocks, aprons, sleeves, gloves, etc. For example, smocks worn in processing operations, aprons (minimum) in packinghouses after wash step. Sleeves are required to prevent product contact with clothing. Items

should be laundered in-house or by contract laundering agency. Individual workers should not take garments home for cleaning. Where items are laundered in-house the auditee should have documented SOP and GMP rules about how these garments are cleaned. If workers sleeves come into contact with washed ready-to-eat products then protective waterproof sleeve covers should be used. Glove policy should be clear to workers – auditors will establish policy before making scoring decisions and note this policy for the audit report. Gloves are not allowed to replace hand-washing requirements. Gloves should be changed after break periods, using toilet facilities, any activity other than handling of food items or when gloves are soiled, torn or otherwise contaminated. If re-useable gloves are used, then they should be made of material that can be readily cleaned and sanitized, clean gloves should be issued at least daily and as needed throughout the day and stored properly in-between uses. Gloves should not be taken home for cleaning. Where gloves are used they should be non-latex (e.g. vinyl, nitrile, etc.) – see 2.20.03. This includes gloves in first-aid kits.

Workers should not wear personal clothes with sequins, pom-poms, fur, etc.; no sleeveless tops without an over garment. See the [applicability chart](#).

Minor deficiency (7 points) if:

- Single/isolated instance(s) of outer garments or gloves being taken home.
- Single/isolated instance(s) of gloves not being replaced when contaminated.
- Single/isolated instance(s) of protective garments not being worn where required (processed products, after wash step in packinghouse).

Major deficiency (3 point) if:

- Numerous instances of outer garments or gloves being taken home.
- Numerous instances of gloves not being replaced when contaminated.
- Numerous instances of protective garments not being worn where required (processed products, after wash step in packinghouse).

Non-compliance (0 points) if: (one of the following is found)

- An outer garment policy is **not** established.
- Systematic failure to replace gloves when contaminated.
- Systematic failure to wear protective garments where required (processed products, after wash step in packinghouse).
- Systematic non-compliance to the above and/or company policy.

2.20.07: Do workers remove protective outer garments e.g. smocks, aprons, sleeves and gloves when on break and before using the toilets and when going home at the end of their shift?

Total compliance (5 points): When worn, protective outer garments e.g. aprons, smocks, sleeves, gloves are to be removed when workers leave the work area (when they go to the restroom, break room, outside, smoking breaks, etc.). Hairnet removal when leaving the work area is not mandated by this audit.

Minor deficiency (3 points) if:

- Single/isolated instance(s) are observed of non-compliance to the above

Major deficiency (1 point) if:

- Numerous instances are observed of non-compliance to the above

Non-compliance (0 points) if:

- Systematic non-compliance to the above

2.20.08: Is there a designated area for workers to leave protective outer garments e.g. smocks, aprons, sleeves and gloves when on break and before using the toilets?

Total compliance (5 points): There is a designated area for workers to leave protective outer garments when they are worn e.g. aprons, smocks, sleeves and gloves. Workers are observed using the designated area when they leave the work area (when they go to the toilet facility, break room, outside, etc.). Workers should not leave protective outer garments on floors, work tables, equipment or packaging materials. Designated area should not be within the toilet facilities, inside the break room, next to personnel clothing or any other area that might be a risk to the outer garments. Garments should not be left touching product, packaging or food contact surfaces.

Minor deficiency (3 points) if:

- Single/isolated instance(s) are observed of non-compliance to the above

Major deficiency (1 point) if:

- Numerous instances are observed of non-compliance to the above

Non-compliance (0 points) if:

- There is not a designated area for workers to leave aprons, sleeves and gloves when on a break.
- There is a designated area; however, no workers use this area.
- Any of the items are observed being placed on the floor.
- Systematic non-compliance to the above.

2.20.09: Workers personal items are not being stored in the production and material storage areas?

Total compliance (5 points): Workers should have a designated area for storing personal items such as coats, shoes, purses, medication, etc. Areas set aside for worker personal items should be far enough away from stored raw or finished products, packaging materials, processing equipment or processing lines to prevent contamination and avoid food security risks. Lockers are ideal if maintained properly, mounted off the floor and with sloping tops and located outside production and storage areas. Wire, see-through lockers are ideal.

Minor deficiency (3 points) if:

- Single or isolated instance(s) of personal belongings, personal food, etc. being found in production or storage areas.

Major deficiency (1 point) if:

- Numerous instances of personal belongings, personal food, etc. being found in production or storage areas.

Non-compliance (0 points) if:

- Systematic failure to prevent personal belongings, personal food, etc. being taken into the production area.

2.20.10: Is smoking, eating, chewing and drinking confined to designated areas?

Total compliance (10 points): Smoking, chewing tobacco, chewing gum, drinking and eating is permitted in designated areas that are away from production and storage areas. Spitting should be prohibited in all areas. Smoking should not be permitted in eating and drinking areas. Potable water should be provided in all places of employment for drinking following local and national laws. Portable drinking water dispensers should be designed, constructed and maintained in a sanitary condition, capable of being closed, and equipped with a tap. The water should be dispensed in single-use drinking cups or by fountains. Common drinking cups and other common utensils are prohibited. Drinking is not permitted near the production

line. Check work areas refuse containers and look in out of sight areas. If food consumption areas are designated within production offices or maintenance areas then the control of cross contamination, GMPs and access to hand washing facilities should be considered.

21 CFR Part 110.10 <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=110.10>
29 CFR Part 1910.41
http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9790

Minor deficiency (7 points) if:

- Single/isolated instance(s) are observed of non-compliance to the above (includes evidence of smoking, eating, spitting, chewing gum, improper storage of break time food or drinking containers in interior refuse containers).
- Single/isolated instance(s) of designated area not meeting appropriate GMP standards.

Major deficiency (3 points) if:

- Numerous instances are observed of non-compliance to the above (includes evidence of smoking, eating, spitting, chewing gum, improper storage of break time food or drinking containers in interior refuse containers).
- No designated smoking area (unless the site has a non-smoking policy).
- Numerous instances of designated area not meeting appropriate GMP standards.

Non-compliance (0 points) if:

- Systematic consumption of food and beverages outside of designated areas.
- No temperature control storage of break time food.
- Systematic evidence of smoking outside the designated area.
- Systematic evidence of using chewing tobacco in production and storage areas.
- Designated area lacks access to a hand wash station.
- Systematic non-compliance to the above criteria.

2.20.11: Are all items removed from shirt or blouse top pockets?

Total compliance (3 points): Observations show that there are no items stored in workers' shirts, blouse and smock top pockets. Ideally top pockets are sewn up or non-existent. Remember to also check maintenance workers in the production area. Special exception allowed for security identification tags as long as they are securely fastened to the person.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of items observed in shirt, blouse or smock top pocket

Major deficiency (1 point) if:

- Numerous instances of items observed in shirt, blouse or smock top pockets

Non-compliance (0 points) if:

- Systematic use of shirts, blouse or smock top pockets.

2.20.12: Is there a first aid kit(s) readily available in the facility and adequately stocked?

Total compliance (5 points): First aid kit(s) should be adequately supplied to reflect the kinds of injuries that occur (including any chemicals stored on-site) and should be stored in an area where they are readily available for emergency access. Date-coded materials should be within dates of expiration. Bandages used in food facilities should be waterproof and blue in color for easy visual detection, with a metal strip behind the wound pad for detection on lines with metal detectors. In facilities that handle only whole product, waterproof blue bandages without a metal strip are acceptable (inclusion of a metal strip is preferred). For facilities handling products that may be perceived as blue e.g. blueberries, use of band

aids that are not blue are permitted if of a color contrasting to product and equipment. Auditors should verify by checking the first-aid kit(s).

Minor deficiency (3 points) if:

- Single instance of a facility with metal detection in place having waterproof blue bandages without a metal strip.
- Single instance of a facility without metal detection (whole or boxed products) not having waterproof blue bandages.
- Single/isolated instance(s) of first aid kit(s) not having adequate supplies, supplies out-of-date or kit not readily accessible.

Major deficiency (2 points) if:

- More than one instance of a facility with metal detection in place using waterproof blue bandages without a metal strip.
- More than one instance of a facility without metal detection in place (whole or boxed products) not having waterproof blue bandages.
- Numerous instances of first aid kit(s) not having adequate supplies, supplies out-of-date or kit not readily accessible.

Non-conformance (0 points) if:

- Waterproof blue bandages with a metal strip are not available in a facility with metal detection.
- Waterproof blue bandages are not available in a facility without metal detection.
- Systematic failure to provide first aid kit(s) with adequate supplies, supplies out-of-date or kit not readily accessible.

Equipment

2.21.01: Are food contact equipment surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g. tape, string, cardboard, etc.)?

Total compliance (15 points): Processing and packing equipment and auxiliary supporting equipment is free of flaking paint and other unhygienic materials e.g. tape, string, cardboard, etc. Products are not being cleaned of debris using clothes and/or towels. Food contact surfaces are corrosion free. Surfaces are maintained in good condition.

21 CFR 110.3 g Definition. Food-contact surfaces are those surfaces that contact human food and those surfaces from which drainage onto the food or onto surfaces that contact the food ordinarily occurs during the normal course of operations. "Food-contact surfaces" includes utensils and food-contact surfaces of equipment.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of flaking paint, rust or other unhygienic materials which does not pose a threat to product or packing contamination.

Major deficiency (5 points) if:

- Single/isolated instance(s) of flaking paint, rust or other unhygienic materials which may pose a threat to product or packing contamination.
- Numerous instances of flaking paint, rust or other unhygienic materials which do not pose a threat to product or packing contamination.

Non-compliance (0 points) if:

- Inspection shows numerous areas of flaking paint, rust or other unhygienic materials, which may pose a threat to product or packing contamination.
- **Any observation of direct gross systematic contamination of product, ingredient or packaging materials (revert back to Q 2.18.05, automatic failure).**

2.21.02: Are non-food contact equipment surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g. tape, string, cardboard, etc.)?

Total compliance (10 points): Non-contact surfaces should be free from any potential source of contamination such as flaking paint, corrosion, rust and other unhygienic materials e.g. tape, string, cardboard, etc. The surface should be made of smooth material that can be cleaned and sanitized easily.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of flaking paint, rust or other unhygienic materials e.g. tape.

Major deficiency (3 points) if:

- Numerous instances of flaking paint, rust or other unhygienic materials e.g. tape.

Non-compliance (0 points) if:

- Systematic evidence of rusting, flaking paint, use of unhygienic materials e.g. tape.
- **Any observation of direct gross systematic contamination of product, ingredient or packaging materials (revert back to Q 2.18.05, automatic failure).**

2.21.03: Does equipment design and condition (e.g. smooth surfaces, smooth weld seams, non-toxic materials, no wood) facilitate effective cleaning and maintenance?

Total compliance (15 points): Equipment should be made of appropriate materials for current use that can be easily cleaned (smooth, non-porous, non-toxic, no dead spots) and maintained in an acceptable condition. Equipment should be designed to allow access to all areas and there should be no debris

trapping areas that cannot be easily cleaned, including hollow structures on supports, rollers, racks, etc. There should be no metal-to-metal contact that results in grinding and therefore potential metal contamination. There should be no “bobbly”, debris trapping welds that are hard to clean. Equipment should be mounted off the floor at least 6 inches (15 cm) to allow for cleaning.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of “bobbly” welds, rough surfaces, poorly designed equipment that traps debris.
- Single/isolated instance(s) of hard to reach areas where cleaning is made difficult.
- Single/isolated instance(s) of inferior materials e.g. porous material construction, wood, non-food grade materials).

Major deficiency (5 points) if:

- Numerous instances of “bobbly” welds, rough surfaces, poorly designed equipment that traps debris.
- Numerous instances of hard to reach areas where cleaning is made difficult.
- Numerous instances of inferior materials e.g. porous material construction, wood, non-food grade materials).

Non-compliance (0 points) if:

- Condition and/or design of equipment will not allow for effective cleaning under normal conditions.
- Systematic proof of poor design and installation making it difficult to access equipment for cleaning.
- Systematic poor welding, rough surfaces, poorly designed equipment that traps debris.

2.21.04: Are thermometers (independent of thermostat probes) present in all coolers and freezers?

Total compliance (5 points): Independent thermometers or temperature recorders should be present in all coolers and freezers. Non-applicable if no coolers and/or freezers are not used. Thermometers should be separate from the thermostat probes, since there is always a chance that the thermostat system might go down and/or the probes themselves might be incorrect. If multiple probes are in a room with a system able to detect an out-of-calibration, broken or down probe and able to see the other probes in the room are in working order then this is also acceptable. Not applicable if cooler and/or freezers are not used.

Minor deficiency (3 points) if:

- Single/isolated instances of thermometer(s) not present in coolers or freezers.
- Only have a single thermostat probe.

Major deficiency (1 point) if:

- Numerous instances of thermometers not present in coolers or freezers.

Non-compliance (0 points) if:

- No thermometers present in coolers or freezers.

2.21.05: Are all thermometers non-glass and non-mercury?

Total compliance (10 points): All thermometers should be non-glass and non-mercury in design; glass should be shielded to prevent product or packing contamination in the event of breakage. Mercury thermometers are not allowed even if shielded. Mercury is a toxin; mercury thermometers should be disposed of safely at a hazardous waste collection site.

Minor deficiency (7 points) if:

- Single/isolated instance(s) (3 or less) unshielded glass stem thermometer observed.

Major deficiency (3 points) if:

- Numerous (more than 3) unshielded glass stem thermometers observed.

Non-compliance (0 points) if:

- Single instance of a mercury thermometer.
- Single instance of broken glass or glass/mercury thermometer is observed.
- **Any observation of direct contamination of product, ingredients or packaging material – revert to automatic failure.**

Equipment Cleaning

2.22.01: Are food contact equipment surfaces clean?

Total compliance (15 points): All equipment surfaces that make contact with product should be kept in a clean condition to avoid cross contamination. If the line is already running, check the line surfaces; does the debris look fresh or old? The auditor must clearly point out any issues to the auditee. Food debris, bio films, excessive dust, etc., should be cleaned off equipment and facility surfaces in order to reduce the overall facility bio-burden.

21 CFR 110.3 g Definition. Food-contact surfaces are those surfaces that contact human food and those surfaces from which drainage onto the food or onto surfaces that contact the food ordinarily occurs during the normal course of operations. "Food-contact surfaces" includes utensils and food-contact surfaces of equipment, tables, ice machines, ice storage, hydro cooler, etc.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of food contact surface that is unclean.

Major deficiency (5 points) if:

- Numerous instances of food contact surfaces that are unclean.
- Some equipment is not cleaned after the production has ceased for that run time e.g. after final shift.

Non-compliance (0 points) if:

- Systematic observations of food contact surfaces that are unclean.
- Equipment is not cleaned after the production has ceased for that run time e.g. after final shift.

2.22.02: Are non-food contact equipment surfaces clean?

Total compliance (10 points): All equipment surfaces that make contact with product should be kept in a clean condition to avoid cross contamination. If the line is already running, check the line surfaces; does the debris look fresh or old? The auditor must clearly point out any issues to the auditee. The auditor must clearly point out any issues to the auditee. Food debris, bio films, excessive dust, etc., should be cleaned off equipment and facility surfaces in order to reduce the overall facility bio-burden.

21 CFR 110.3 g Definition. Food-contact surfaces are those surfaces that contact human food and those surfaces from which drainage onto the food or onto surfaces that contact the food ordinarily occurs during the normal course of operations. "Food-contact surfaces" includes utensils and food-contact surfaces of equipment, tables, ice machines, ice storage, hydro cooler, etc.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of food contact surface that is unclean.

Major deficiency (3 points) if:

- Numerous instances of food contact surfaces that are unclean.
- Some equipment is not cleaned after the production has ceased for that run time e.g. after final shift.

Non-compliance (0 points) if:

- Systematic observations of food contact surfaces that are unclean.
- Equipment is not cleaned after the production has ceased for that run time e.g. after final shift.

2.22.03: Are items (barrels, bins, etc.) that are used to hold or store product clean?

Total compliance (10 points): Bins, boxes, hoppers, barrels, baskets, etc. used for the storage of product, or ingredients should be kept in a clean state. The storage of these items should ensure that they remain clean and uncontaminated e.g. covered.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of a dirty product storage container (there is no direct product contamination).
- Single/isolated instance(s) product storage container is clean, but being stored in an area where it might be contaminated and then used, e.g. a centrifuge barrel stored under an overhead production line, without proper protection.

Major deficiency (3 points) if:

- Numerous instances of dirty product storage containers (there is no direct product contamination).
- Numerous product storage containers, which are clean, but being stored in an area where they might be contaminated and then used, e.g. centrifuge barrels stored under an overhead production line, without proper protection.

Non-compliance (0 points) if:

- Systematic failure to not clean food storage containers.
- There is no cleaning program for the containers.
- Systematic lack of control with respect to storage of clean food storage containers.

2.22.04: During cleaning are foods and packaging protected from contamination?

Total compliance (15 points): Raw materials, ingredients, work in progress, finished goods and packaging should be protected or removed from the area during cleaning. This includes cleaning lines between product runs. Cleaning operations should be carried out in a manner that prevents contamination such as excessive spray from high-pressure water or air hoses. Cleaning should also not contaminate already cleaned equipment. Not applicable if cleaning practices are not observed.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of cleaning activities having the potential for re-contaminating previously cleaned equipment e.g. cleaning the floor after sanitizing equipment and observing splash back occurring. Products, ingredients and packaging are protected.

Major deficiency (5 points) if:

- Single instance of activities having the potential for contaminating food and/or packaging. Products, ingredients or packaging are not adequately protected. This includes splash back and lack of production line screening. Auditor should be careful to check that no contamination has occurred (consult non-compliance texts).
- Numerous instances of cleaning activities having the potential for re-contaminating previously cleaned equipment e.g. cleaning the floor after sanitizing equipment and observing splash back occurring. Products, ingredients and packaging are protected.

Non-compliance (0 points) if:

- Any observation of direct contamination of product, ingredients or packaging materials that adulterates the product with a cleaning chemical or contaminates product with splash back. **The auditor should observe and see if the auditee takes corrective actions (without prompting). If no action is taken and the contamination is severe e.g. not just water, but say cleaning chemical and water, then the auditor should consider using the 2.18.05 adulteration option and scoring an automatic failure.**

2.22.05: Are cooling units including coils in coolers and freezers clean and free of aged, dirty ice?

Total compliance (5 points): All coils in coolers and freezers should be clean. There should be no build-up of dust, mold or other airborne contaminants (a good flashlight is useful). Not applicable if there are no cooling units on site. There should be no colored ice/dirty ice build-up. There should be no colored ice/dirty ice build-up. Water from refrigeration drip pans is drained and disposed of away from product and product contact surfaces (score in 2.23.03).

Minor deficiency (3 points) if:

- Single/isolated instance(s) of unclean coils.
- Single/isolated instance(s) of ice build-up on coils that appears to be old (dirty or off colored).

Major deficiency (1 point) if:

- Numerous instances of unclean coils.
- Numerous instances of ice build-up on coils that appears to be old (dirty or off colored).

Non-compliance (0 points) if:

- All coils that are observed are unclean.
- Ice build-up on all coils that appears to be old (dirty or off colored).
- **Any observation of direct contamination of product, ingredient or packaging materials – reverts back to Q 2.18.05.**

2.22.06: Are all fan guards dust-free and the ceiling in front of the fans free of excessive black deposits?

Total compliance (5 points): All fan guards (cooling units and general ventilation) are clean. There is no build-up of dust or other materials on the fan guards. Check the ceiling in front of the cooling unit for black deposits and signs of cleaning issues. Check and see if there is evidence of cooler unit debris on the floor or products/packaging stored near the cooler.

Minor deficiency (3 points) if

- Single/isolated instance(s) of fan guards that are unclean and/or evidence of issues with the ceilings and pipe fittings in front of the chiller unit. Fan is not located above uncovered product, ingredients or packaging.

Major deficiency (1 point) if:

- Numerous instances of fan guards that are unclean and/or evidence of issues with the ceilings and pipe fittings in front of the chiller units. Fans are not located above uncovered product, ingredients or packaging.
- A single instance where cooling unit debris is noted above finished product and/or packaging, but there is no contamination of food materials or food contact packaging.

Non-compliance (0 points) if:

- Consistent failure to maintain clean fan guards and ceilings/pipe work in front of the fan guards.
- More than one instance where cooling unit debris is noted on finished product and/or packaging but there is no contamination of food materials or food contact packaging.
- Any evidence of cooling unit debris noted directly contaminating food materials or food contact packaging. **The auditor should consider whether this is adulteration and whether to apply Q 2.18.05 and score an automatic failure.**

2.22.07: Is stored equipment that is not used on a daily basis stored in a clean condition with food-contact surfaces protected and/or are they retained on cleaning schedules in some manner, even though they are not in use?

Total compliance (10 points): All equipment that is not used on a daily basis should be stored clean, with food-contact surfaces protected and stored off the floor. Not applicable if equipment is all being used. Allowances to be made if the equipment is part of the routine sanitation program when not in use. Stored equipment should be clean and well maintained.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of clean equipment that is not used on a daily basis is stored with food-contact surfaces unprotected and the equipment is not part of a routine sanitation schedule.
- Single/isolated instance of equipment being stored in an unclean condition.

Major deficiency (3 point) if:

- Numerous instances of clean equipment that is not used on a daily basis stored with food-contact surfaces unprotected and the equipment is not part of a routine sanitation schedule.
- Numerous instances of equipment being stored in an unclean condition.

Non-compliance (0 points) if:

- All equipment that is not used on a daily basis is stored with food-contact surfaces unprotected and the equipment is not part of a routine sanitation schedule.
- All stored equipment that is observed has been stored in an unclean condition.

2.22.08: Are all utensils, hoses, and other items not being used stored clean and in a manner to prevent contamination?

Total compliance (10 points): All utensils, hoses and other items not being used are stored clean and in a manner to prevent contamination (off ground, dedicated areas, etc.).

Minor deficiency (7 points) if:

- Single/isolated instance(s) of items not in use stored inappropriately. There is little potential hazard to product, ingredients or packaging.

Major deficiency (3 points) if:

- Numerous instances of items not in use, stored inappropriately. There is little potential hazard to product, ingredients or packaging.

Non-compliance (0 points) if:

- Any items not in use stored in a manner that may contaminate product, ingredients or packaging.

2.22.09: Are maintenance tools that are used in the production and storage areas of the facility clean, sanitary and corrosion free?

Total compliance (3 points): Tools that are used for repairing equipment in the production and storage areas should be clean, free of corrosion and in good working order i.e. fit for their intended use. They should be stored appropriately to ensure they do not pose a risk of direct or indirect contamination when in production and storage areas, Special attention should be focused on those tools that are resident in tool boxes, within production areas, tools in the maintenance areas that are ready to be taken into production areas, or are used in the maintenance area on equipment that will be going into the production and storage areas. Sometimes a maintenance shop might have tools that are used exclusively on external trucks and farm equipment; the auditor should avoid scoring these kinds of tools.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of unclean and/or corroded maintenance tools used on food equipment.
- Single/isolated instance(s) of maintenance tools being stored inappropriately.

Major deficiency (1 point) if:

- Numerous instances of unclean and/or corroded maintenance tools used on food equipment.
- Numerous instances of maintenance tools being stored inappropriately.

Non-compliance (0 points) if:

- Systematic failure to ensure that maintenance tools are clean and/or corrosion free.
- Systematic failures to ensure maintenance tools are stored appropriately.

2.22.10: Are excess lubricants and grease removed from the equipment?

Total compliance (5 points): Excess lubricants and greases are removed from equipment and there are no observations of leakage or drips. Where drive motors are mounted over product or packaging zones catch pans should be installed and where needed, with drainage via hosing to the floor. Cranes, chains and pulley equipment above lines are potential areas where excessive grease might be an issue. Key consideration should be given to where lubricants and greases can leak onto product and product contact surfaces. Lubrication should be frequent and using small amounts of lubricant, as opposed to large amounts of lubricant used on an infrequent basis. Food grade lube should be used where required (see questions in, but food grade materials are still only for incidental contact and all precautions should be taken in order to prevent these from contaminating the product and product contact surfaces.

Minor deficiency (3 points) if:

- Single/isolated instance (s) of excess lubricants or grease on equipment (no product hazard).
- Single/isolated instance(s) of unprotected motor, axle, pump etc.

Major deficiency (1 point) if:

- Numerous instances of excess lubricants or grease on equipment (no product hazard).
- Numerous instances of unprotected motors, pumps axles etc.

Non-compliance (0 points) if:

- Systematic failure to protect pumps, motors, axles etc.
- **Observation of serious direct contamination of product, ingredient or packaging materials with a food grade material – auditor should revert back to question 2.18.05, automatic failure.**
- **Any observation of direct contamination of product, ingredient or packaging materials with a non-food grade material – auditor should revert back to question 2.18.05, automatic failure.**

General Cleaning

2.23.01: Are spills cleaned up immediately?

Total compliance (10 points): To prevent microbial growth and the attraction of pests, reduce cross contamination and maintain a sanitary environment all spills should be cleaned up immediately. Auditors should look in corners, behind racks and shelving, under machines, etc., looking for old debris. Not applicable if there are no spills.

Minor deficiency (7 points) if:

- Single/ isolated instance(s) of improper cleaning of spills, which do not pose a risk to product or materials.

Major deficiency (3 points) if:

- Numerous instances of cleaning issues related to spills.

- Single/isolated instance(s) of spills that may pose the potential risk of contamination for product, materials, and/or product contact surfaces.
- Single/isolated instance(s) of spills exhibiting mold growth or an off odor i.e. that have not been cleaned up for some time.

Non-compliance (0 points) if:

- Numerous instances exhibiting mold growth or an off odor i.e. that have not been cleaned up for some time.
- Numerous instances of spills that may lead to potential product, materials, and/or product contamination.

2.23.02: Are waste and garbage frequently removed from packing and storage areas?

Total compliance (5 points): Cleaning practices include the frequent removal of garbage and waste from all areas to assure that acceptable levels of sanitation are maintained and prevent the attraction of pests. Garbage containers are included in a regular cleaning schedule, in order to prevent them from developing odors, flies, bacterial growth, etc.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of a waste/garbage removal issue, which does not pose a risk to product, material and/or equipment.

Major deficiency (1 point) if:

- Numerous instances of waste/garbage removal issues, which do not pose a risk to product, material and/or equipment.
- Single instance where waste has an off odor; attracted flies (unless in mushroom or onion facility) and or is exhibiting mold growth.

Non-compliance (0 points) if:

- Failure on maintaining the facility areas free of waste and garbage.
- Numerous instances where waste has an off odor; attracted flies (unless mushroom or onion facility) and or is exhibiting mold growth.

2.23.03: Do floor drains flow in a manner that prevents contamination (e.g. from high to low risk areas, from high risk directly to drain system), are they covered, appear clean, free from odors and well maintained?

Total compliance (5 points):

- All facility floor drains, including covers and internal channels are clean, and free of decayed/old material.
- All facility floor drains are free of odors.
- There is no overflow or excessive standing water in the floor drains.
- Drains in processing plants, packinghouses with washing steps and high humidity coolers should be cleaned daily. Daily drain cleaning should also occur at coolers that use hydro-vacuum, dry vacuum, ice injectors, and humidifiers, where storage areas are often wet and/or humid, and also any coolers that while not having this sort of cooling equipment, do store products at high humidity.
- Drains should have smooth walls and bases that allow free flow of water without catching debris, and also aid cleaning of the drains.
- Water from refrigeration drip pans is drained and disposed of away from product and product contact surfaces.

Where possible, auditor should request floor drain covers to be removed for inspection. Use a flashlight to illuminate the bottom of deep drains.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of a facility floor drain that is failing in one of the requirements listed above.

Major deficiency (1 point) if:

- Numerous instances of facility floor drains that are not maintained under acceptable sanitary conditions.
- Numerous instances of facility floor drains that are failing in one of the requirements listed above.

Non-compliance (0 points) if:

- Systematic failure to maintain the facility floor drains in a clean condition.

2.23.04: Do high level areas including overhead pipes, ducts, fans, etc. appear clean?

Total compliance (10 points): Sanitation practices include the scheduled cleaning of overhead pipes, ducts, ceiling supports and structures (e.g. girders), ceilings, etc. Ducts, support structures and pipes are free of excessive dust and spider webs. Mold/mildew and frost build up are kept to a minimum. No blackened areas or stained areas (water damage). Look for stains and other issues with respect to the use of false ceilings if used.

Minor deficiency (7 points) if:

- Single/ isolated instance(s) of any issues mentioned above.

Major deficiency (3 points) if:

- Cleaning of overhead pipes, ducts, ceiling support structures, ceilings, etc., is not considered within the sanitation schedule.
- Numerous instances of any issues mentioned above

Non-compliance (0 points) if:

- Systematic failure to clean overhead structures.

2.23.05: Are plastic strip curtains maintained in a good condition, kept clean and mounted so that the tips are not touching the floor?

Total compliance (5 points): All facility plastic strip curtains are clean, free of mold/mildew, black discoloration free of off-odors, etc. Broken strips are replaced when damaged. Strip curtains should be installed so that the tips are just off the ground (prevents contamination and also is not a forklift safety issue). Strip tips should not touch exposed food products when they pass through the strip curtains – this issue can be scored under 2.19.02, the generic question regarding exposed materials. Strip opacity is usually more a personnel safety issue than food safety.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of improperly maintained plastic strip curtain.
- Strip curtains mounted touching the floor.

Major deficiency (1 point) if:

- Numerous instances of improperly maintained plastic strip curtains.

Non-compliance (0 points) if:

- Systematic failure to maintain strip curtains in a good condition.

2.23.06: Is safety equipment for the sanitation crew adequate, in good condition and stored to prevent cross contamination to raw products, work in progress, ingredients, finished goods or packaging?

Total compliance (3 points): Safety equipment (Personal Protective Equipment (PPE)) is provided for the sanitation crew. The safety equipment supplied should meet all the requirements as shown on the chemical labels of the cleaning agents that are used. Safety equipment storage is organized and segregated from food and packaging materials to prevent contamination. Safety equipment is stored separately away from personal clothing. Access to sanitation equipment should be restricted to trained workers. Safety equipment should be stored securely to prevent unauthorized use. Safety equipment is in good repair.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of safety equipment not stored correctly.
- Single/isolated instance(s) where safety equipment does not appear to have been cleaned prior to storage.
- Single/isolated instance(s) of the safety equipment not being in good repair.
- Single/isolated instance(s) of one piece of required safety equipment not being supplied to workers.

Major deficiency (1 point) if:

- Numerous instances of safety equipment not stored correctly.
- Numerous instances where safety equipment does not appear to have been cleaned prior to storage.
- Numerous instances of the safety equipment not being in good repair.
- Numerous instances of safety equipment not being supplied to workers.

Non-compliance (0 points) if:

- Systematic failure to supply the correct safety equipment for the workers involved.
- Safety equipment has not been maintained properly or has been compromised in some way.

2.23.07: Is cleaning equipment available and stored properly?

Total compliance (5 points): There should be an adequate supply of cleaning equipment (per procedures employed). Cleaning equipment should be free of debris, cleaned and stored correctly between use. Cleaning equipment should be stored away from the food and operational areas in a designated storage area. Cleaning equipment is stored to prevent it becoming a source of cross contamination for the product, materials, packing equipment, and in general, for the complete operation. Brooms, mops etc., should be stored off the floor and "head down" in order to avoid them being contaminated by any accidental spills and prevent them from being harborage areas for pests and ensure debris does not contaminate the handle. Squeegees used for condensate control should be stored in dedicated sanitizer solutions and these solutions should be at the correct dilution and part of the sanitizer monitoring system. Auditors should spot check solution strength during the audit. There should be an adequate supply of cleaning equipment (as per procedures employed). Equipment used for different types of cleaning should not be stored touching each other (see next question).

Minor deficiency (3 points) if:

- Single/isolated instance(s) of the issues mentioned above.
- Single/isolated instance(s) of cleaning equipment that is kept in areas where it may represent a potential risk to contaminate product, materials or equipment.
- Single/isolated instance(s) of cleaning materials temporarily unavailable.

Major deficiency (1 point) if:

- Numerous instances of the issues mentioned above.
- Numerous instances of cleaning equipment that is being stored in a way that may represent a risk for product, materials or equipment.

- Numerous cleaning materials unavailable.

Non-compliance (0 points) if:

- Systematic failure to properly store cleaning equipment.
- Very poor availability of cleaning materials.

2.23.08: Is cleaning equipment identified in order to prevent potential cross contamination issues e.g. production, maintenance, outside, restroom equipment?

Total compliance (10 points): Cleaning equipment should be “area specific”. Coding should prevent cross contamination. Separation of restroom (toilet facility), outdoor, maintenance and production brushes, mops, etc., is most important. Coding should be made clear to all workers (e.g. using posters). If allergens are used, separated coded equipment for allergen management should have been considered. Sometimes there is a need to split equipment within a production area e.g. equipment used on the floor versus equipment used on the machinery.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of coding not being applied properly.
- Single/isolated instance(s) of materials not being coded.
- No signs or policies underlining the coding rules for the workers.

Major deficiency (3 points) if:

- Numerous instances of color not being applied properly.
- Numerous instances of materials not being coded.

Non-compliance (0 points) if:

- Cleaning equipment is not coded (or otherwise distinct).
- Cleaning equipment is coded, but the coding is not being implemented.

2.23.09: Are all items used for sanitation appropriate for their designated purpose (e.g. no steel wool, metal bristles, etc.)?

Total compliance (5 points): Steel wool is avoided for use as cleaning equipment. Cleaning utensils used are constructed to prevent potential contamination of product (e.g. without straw bristles, metal bristles, etc.). Ideally brightly colored plastic bristles are used. Avoid anything that flakes, is made of pervious materials, is a similar color to the products, corrodes or might damage the equipment or facility.

Minor deficiency (3 points):

- Single/isolated instance(s) of unsuitable cleaning materials being used.

Major deficiency (1 point) if:

- Numerous instances of unsuitable cleaning materials being used.

Non-compliance (0 points) if:

- Systematic non-compliance with above.
- Cleaning equipment is unsuitable for the task and is likely to contaminate.

2.23.10: Are toilet facilities and hand-wash stations clean?

Total compliance (15 points): Toilet facilities and hand-washing stations are maintained in a sanitary condition:

- Toilet facilities have a drainage installation that allows the waste to be flushed and disposed properly.
- Toilet facility (including hand washing stations) fixtures are in good operating condition and clean. Cleaning and sanitizing frequency is at least daily.
- No offensive odors are evident.
- No soiled toilet tissue either on the floor or in trash cans.
- Trashcans are available for hand wash paper towels.
- Hand washing stations are properly plumbed to drainage system.
- Hand washing stations are clean and not blocked.

Minor deficiency (10points) if:

- Single/isolated instance(s) of non-compliance to above requirements.
- Single/isolated instance(s) of soiled toilet tissues being placed in trashcan.

Major deficiency (5 point) if:

- Numerous instances of non-compliance to the above requirements.
- Systematic observation of soiled toilet tissues being placed in trashcans.

Non-compliance (0 points) if:

- Failure to properly maintain areas.
- Single instance of soiled toilet tissues being left on the restroom floor.

2.23.11: Are worker break facilities clean, including microwaves and refrigerators? No rotting or out of date foodstuffs?

Total compliance (5 points): Inspection shows that the worker break areas are kept in a sanitary condition and pose no threat of contamination to production or storage areas. Sanitation practices include the periodic cleaning of these areas (includes inside microwaves, inside and behind refrigerators, behind, under and on top of all vending machines, tables, chairs, tops of lockers, etc.) to assure that acceptable levels of sanitation are maintained to prevent potential pest harborage that may affect the product.

Temperature sensitive food should be kept in chillers or chill boxes, not in ambient conditions e.g. on break rooms tables in supermarket bags or in microwaves, where bacteria could grow and might cause food poisoning. Vending machine items should be within expiry date codes. Vending machines should be visibly clean inside and also maintaining desired temperature. Inside of lockers may only be inspected in the presence of the worker after gaining verbal permission.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of finding the issue(s) mentioned above.
- Single/isolated instance(s) of a cleaning issue in the worker break areas.
- Single/isolated instance(s) of out of code product in vending machines.
- Single/isolated instance(s) of foodstuffs being stored at the wrong temperature.

Major deficiency (1 point) if:

- Numerous instances of finding the issues mentioned above.
- Numerous instances of cleaning issues in the worker break areas.
- Numerous instances of out of code product in vending machines.
- Numerous instances of foodstuffs being stored at the wrong temperature.

Non-compliance (0 points) if:

- Failure to properly maintain worker break areas.
- Visible mold/breakdown on items for sale in vending machines.
- Personnel food storage areas are unsanitary.

2.23.12: Is the maintenance shop organized - i.e. equipment and spares stored in a neat and tidy fashion?

Total compliance (5 points): Inspection of the facility shows that the maintenance shop is kept clean and organized. Sanitation practices include the periodic cleaning of this area in order to avoid pest harborage conditions that may contaminate the product, materials or equipment. Shop should employ a “clean as you go” policy with respect to metal filings and chips which are generated when metalworking. Shops should not be located near or in production and product and packaging storage areas, in order to avoid foreign material contamination. Shops that have small break areas, should follow all the usual GMP rules to prevent cross contamination i.e. a segregated area away from equipment, tools and machinery being worked on, hand washing after breaks and care should be taken not to contravene the facility glass policy – any issues with the break area would be scored down under the question about break areas.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of a cleaning issue in the maintenance shop.

Major deficiency (1 point) if:

- Numerous instances of cleaning issues in the maintenance shop.
- Shop is located in production/storage areas and a minor potential for cross contamination exists.

Non-compliance (0 points) if:

- Failure in maintaining the maintenance shop in a clean condition.
- Shop is located in production/storage areas and a major potential for cross contamination exists.

2.23.13: Are internal transport vehicles (e.g. forklifts, bobcats, pallet jacks, trolleys, floor cleaners, etc.), clean, do not emit toxic fumes and being used in a sanitary manner?

Total compliance (5 points) if:

- Vehicles and equipment used for moving raw materials, work-in-progress, finished products, and packaging throughout and within the facility are clean, well maintained, and do not transport goods outside the facility (unless cleaned and sanitized before re-entering). Open dock areas are accepted as being within the facility in this instance.
- Internal transport vehicles (forklifts, bobcats (or similar type vehicle), pallet jacks, trolley, floor cleaners, etc.) used to transport food are in a good state of repair, clean, odor free, free of rodents and insects.
- Internal transport vehicles (forklifts, bobcats (or similar type vehicle), pallet jacks, trolley, floor cleaners, etc.) used in food areas should not be gasoline or diesel powered; propane (LPG) powered vehicles are permitted although electric powered are ideal. Trucks and forklifts should not be left idling in enclosed spaces or during loading or unloading of products to reduce health risk and possible tainting of foods.
- A sanitation program for internal transport vehicles is established to assure proper sanitation levels.
- Internal transport vehicles should not be mobile “break areas” i.e. food and drink should not be stored on the vehicles.
- Floor cleaners should be kept in good condition and cleaned in order to prevent cross contamination. Where relevant, the brushes and fixtures on the floor cleaner might need to be changed or cleaned when moving from one risk area to another.
- Bobcats (or similar type vehicle) used for ice storage areas should be clean and not a cross contamination vector. Ideally the bobcat used for ice storage is dedicated for the area where the ice is stored.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of finding the issues mentioned above.

Major deficiency (1 point) if:

- Numerous instances of finding the issues mentioned above.

Non-compliance (0 points) if:

- Systematic failure to maintain the transport vehicles in a clean and sanitary condition.
- Systematic use of gasoline or diesel powered vehicles in food areas.
- Multiple instances of cases where the failure to maintain the transport vehicles in a sanitary condition may lead to potential product contamination.

2.23.14: Are shipping trucks clean and in good condition?

Total compliance (5 points). Trucks and/or trailers (includes in-house delivery and shuttle trucks) used to transport food and packaging are in a good state of repair, clean, odor free, free of rodent and insects. Question is not applicable if there are no trucks on the dock facility when the audit occurs. Trucks should be of the right design for the kind of product they are shipping.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of improperly maintained shipping truck.

Major deficiency (1 point) if:

- Numerous instances of shipping trucks that are not maintained under acceptable sanitary conditions.
- A single instance of shipping truck in an unacceptable sanitary condition, which may contaminate the product.

Non-compliance (0 points) if:

- Systematic failure to maintain shipping trucks in a clean and sanitary condition.
- Multiple instances of cases where the failure on maintaining the shipping trucks in sanitary conditions may lead to potential product contamination.
- **Any observation of direct contamination of product, ingredient or packaging materials (except condensate). In this case the score reverts back to 2.18.05, automatic failure question.**

Buildings and Grounds

2.24.01: Are all lights in the facility that could potentially contaminate raw materials, work in progress, ingredients (including ice), finished goods, equipment or packaging, shielded to protect product from contamination in the event of breakage?

Total compliance (15 points): All glass lights in the facility that can potentially contaminate finished products, raw materials, equipment, or packaging should be shielded, coated or manufactured of shatter-resistant material to protect from product contamination in the event of breakage. This includes, but is not limited to items such as light bulbs, emergency lights, truck loading lights (dock lamps), insect light trap lights, forklift lights, lights in bathrooms or maintenance shops that open into production area, etc. End piece fittings on tube lights should be secure. Precautions should be taken to prevent glass contamination in the event of glass breakage. Windows and computer monitors in packing areas should be covered with a plastic film to prevent shatter. Inside light covers should be clean, free of algae, insects and excessive dirt.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of unprotected glass in an area that could potentially contaminate finished product, raw materials, processing/packaging equipment, or packaging materials.
- Observed missing end piece tube light fittings.

Major deficiency (5 points) if:

- Numerous instances of unprotected glass in an area that could potentially contaminate finished product, raw materials, processing/packaging equipment, or packaging materials.

- Single instance of a broken light found within the facility.

Non-compliance (0 points) if:

- Majority of lights are not protected.
- More than one instance of broken lights found within the facility.

2.24.02: Has the facility eliminated or controlled any potential metal, glass or plastic contamination issues?

Total compliance (15 points): No metal, glass or plastic issues noted (excluding issues noted under specific questions already noted within this audit). This question is designed to allow the auditor to underline potential foreign material contaminants to the auditee that are not covered by other more specific questions within the audit. Examples include: pins in sign boards within the facility, using “snappable” blades instead of one piece blades, noting broken and brittle plastic issues on re-useable totes and finding uncontrolled glass items like coffee pots, computer screens, clock faces, eye glasses, office window glass etc. in production areas. Plastic coated shatterproof light bulbs are also acceptable without further protection. Auditors should take precaution not to bring glass items into the facility during inspections. If a glass item cannot be replaced immediately or glass is necessary, e.g. a high pressure gauge, then use of a glass register might be considered, see question in 2.28.11.

Minor deficiency (10 points) if:

- Single/isolated instance(s) of potential foreign material contaminants observed.
- Single/isolated instance(s) of glass item noted in the production/storage areas, but is not accounted for on the glass register.

Major deficiency (5 points) if:

- Numerous instances of potential foreign material contaminants observed.
- Numerous glass items noted in the production/storage areas, but are not accounted for on the glass register.
- Single instance of a broken glass item found within the facility.

Non-compliance (0 points) if:

- Systematic failure to control potential foreign objects on site.
- More than one instance of a broken glass item found within the facility.
- **Any incident of direct product contamination with a foreign material like glass, metal or plastic constitutes a health hazard and is viewed as adulteration. Revert to Q 2.18.05.**

2.24.03: Has the facility eliminated the use of wooden items or surfaces?

Total compliance (5 points) if:

- Walkways, storage containers, ladders, platforms, broom/mop handles, utensil handles, etc. should not have wooden parts.
- Wood pallets should be acceptable as long as they are of not fragmenting, look clean and are dry. Wooden pallets should never directly touch product.
- Wooden bins for potatoes, onions and other items that require cooking (or some other kill step) prior to consumption or have an inedible skin should be allowed if they are not fragmenting and they are clean and in a good condition. Repairing of wooden bins should be recorded as part of the maintenance records; see maintenance document questions 2.28.01 to 2.28.03. Plastic storage bins are preferred.
- Wooden mushroom growing trays should be allowed in mushroom operations, as long as they are clean and not fragmenting. Mushrooms destined for consumption should not be touching the wooden trays.
- “Wet facilities and high humidity facilities” should not be constructed of wooden walls or ceilings.
- Use of wood tables or similar food contact equipment should be scored under 2.21.03.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of utensils/equipment with wood parts in use in the facility.
- Using wooden bins (that are not fragmenting and are clean and generally in good condition) for potentially ready-to-eat items like apples, stone fruit, citrus, melons, etc.
- Single/isolated instance(s) of structural items e.g. walls/floors/platforms constructed of wood in “wet” and/or high humidity facilities.

Major deficiency (1 point) if:

- Numerous instances of utensils/equipment/platforms with wood parts in use in the facility
- Numerous structural items e.g. walls/floors constructed of wood in “wet” and/or high humidity facilities.

Non-compliance (0 Point) if:

- Majority of structural items e.g. walls/floors/platforms constructed of wood in “wet” and/or high humidity facilities.

2.24.04: Is there adequate lighting in the packing and storage areas?

Total compliance (5 points): Adequate lighting should be made available in all areas where inspection operations and inspections are occurring. This includes production areas, storage areas, hand-washing areas, locker rooms, maintenance areas and restrooms. The lighting should be strong enough to allow workers to see clearly so that they can conduct their work in an unobstructed manner. The color of lighting should be such that it does not hide dirt, decay, etc.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of an area that has lights but the lighting is not strong enough. This could be due to burnt out bulbs, missing bulbs, improperly spaced lighting or lighting of insufficient wattage.

Major deficiency (1 point) if:

- Numerous instances of an area that has lights but the lighting is not strong enough. This could be due to burnt out bulbs, missing bulbs, improperly spaced lighting or lighting of insufficient wattage.

Non-compliance (0 points) if:

- Any critical area that does not have lighting such as areas where processing is conducted, coolers, dock areas, warehousing of packaging or raw materials.

2.24.05: Is ventilation adequate to control dust, condensation, odors and vapors?

Total compliance (10 points): The ventilation system (cooling and heating) should be sufficient to control dust, condensation, mold, dust, odors and vapors so that conditions do not exist where raw materials, work in progress, ingredients or packaging materials may be contaminated or tainted. Ventilation equipment is balanced to provide an adequate air exchange rate to prevent condensation on walls, ceilings or other surfaces in product areas. Ideally positive air pressure is employed in processing operations.

Where condensation is not adequately controlled by ventilation or is considered inevitable, action should be taken to ensure raw materials, work in progress, ingredients, finished products or packaging materials are not located below areas where condensate may drip. Where this is not possible facilities should control such condensation by cleaning and sanitizing the surfaces as often as needed in accordance with the facility's SSOPs.

Where condensation has formed to such an extent on surfaces (that are not being cleaned and sanitized) that raw materials, work in progress, ingredients, finished product or packaging materials may become or

are becoming contaminated the condensation is considered be an adulterant (scoring reverts to Q2.18.05), and creating insanitary conditions. For example, heavily beaded condensation drips from a ceiling of a processing area that is not regularly cleaned and sanitized in accordance with the facility's SSOP's. Another example, condensate from a cooler ceiling drips onto exposed product, condensate from refrigeration unit surfaces (which have not been cleaned and sanitized) drips onto exposed product or onto product boxes.

FSIS <http://meatsci.osu.edu/roundtablenrappealsfsis.html>

<http://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/UCM374510.pdf>

Ventilation http://haccpalliance.org/sub/news/San_Guide.pdf

Minor deficiency (7 points) if:

- Single instance of finding an issue mentioned above.

Major deficiency (3 points) if:

- More than one instance of finding an issue(s) mentioned above.

Non-compliance (0 points) if:

- Numerous instances of potential product contamination by dust, condensation or objectionable and/or tainting odor.
- **Direct contamination of raw materials, work in progress, ingredients, finished goods, food contact packaging or food contact surfaces by dust or condensation. Auditor should consider reverting to Q 2.18.05, the automatic failure adulteration question.**

2.24.06: Are floor surfaces in good condition, with no standing water, no debris trapping cracks and are they easy to clean?

Total compliance (10 points): The floor surfaces in the facility should be suitable for the type of operation being conducted. The floor should be constructed in such a manner that it may be adequately cleaned and kept in good repair. Floors surfaces in all areas should be smooth without deep cracks or seams; be smooth, durable, non-absorbent and easily cleanable. Cracks should not trap debris or water. Some hairline floor cracking is allowed, but should be easy to keep clean and not trapping debris. Check for concrete breakdown (exposed aggregate, where flooring is exposed to concentrations of different chemicals e.g. near wash lines, chemical stores etc.). Assess areas where concrete as broken down and see if there is standing water and debris. Floors should not have low areas that can allow pools of water to form. Pay special attention to areas that have a lot of forklift traffic.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of floor not kept in clean condition or kept in poor state of repair.
- Single/isolated instance(s) of floor with standing water.
- Single/isolated instance(s) of finding the issues mentioned above.

Major deficiency (3 points) if:

- Numerous instances of floor not kept in clean condition or kept in a poor state of repair, e.g. where deep cracks have been found holding debris.
- Numerous instances of floor having standing water.
- Numerous instances of finding the issues mentioned above.
- Any instance where a condition of the floor poses a threat to food safety by potential contamination e.g. Potential for cross contamination i.e. water splash onto exposed product and/or packing.

Non-compliance (0 points) if:

- Systematic failure to keep floors in good state of repair and in clean condition.
- Systematic failure to prevent standing water.

- **Direct contamination of food product, food packaging materials, or food processing equipment due to poor maintenance or sanitation of floors. Auditor should consider reverting to Q. 2.18.05, the automatic adulteration failure question.**

2.24.07: Are the floor drains where they are needed for drainage and cleanup?

Total compliance (5 points): Drains should be constructed in such a manner that they provide adequate drainage in all areas where floors are subject to flood-type cleaning or where normal operations release or discharge water or other liquid waste on the floor. Drains should flow from processed to raw to avoid contamination in processing plants. Facilities that are washing product should have adequate drainage. Not applicable in dry facilities with no drains.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of an area(s) having insufficient number of drains.
- Single/isolated instance(s) of an area(s) having blocked or overflowing drains.

Major deficiency (1 point) if:

- Numerous instances of an areas having insufficient number of drains.
- Numerous instances of an areas having blocked or overflowing drains.

Non-compliance (0 points) if:

- An entire area lacking drains.
- **Drains are plugged and overflowing and providing a condition that may contaminate the product, equipment or packaging materials. Auditor should consider reverting back to question 2.18.05 if product/packaging looks like it is being systematically contaminated.**

2.24.08: Are doors to the outside pest proof?

Total compliance (5 points): All doors to the outside should be designed and properly fitted out to prevent the ingress of rodents and insects into the facility. Doors should have no gaps greater than approximately 1/8 inch (3 mm). If doors have screens, the openings should be no greater than 1/8 inch (3 mm). Gaps are often at bottom of doors and also at the top of roller doors. Air curtains are acceptable, provided they are operating properly. Personnel doors to the outside should be loaded so that they close properly. Rule of thumb is that if you can see daylight gaps, then further investigation is required. If doors are maintained open during production with no protection (e.g. air curtain, screen, etc.) they cannot be considered pest proof (scored in 2.18.02/2.19.03.)

Minor deficiency (3 points) if:

- Single/isolated instance(s) of a door having a gap greater than 1/8 inch (3 mm).
- Single/isolated instance(s) of personnel doors not closing properly and improper mesh size (where screens are used).
- Single/isolated instance(s) of an air curtain not operating properly.

Major deficiency (1 point) if:

- Numerous instances of doors having gaps greater than 1/8 inch (3 mm).
- Numerous instances of personnel doors not closing properly and improper mesh size (where screens are used).
- Numerous instances of air curtains not operating properly.

Non-compliance (0 points) if:

- Systematic observations of doors having gaps with greater than 1/8 inch (3mm).
- Systematic observations of personnel doors not closing properly and improper mesh size (where screens are used).

- Systematic observations of air curtains not working properly.

2.24.09: Are dock doors fitted with buffers to seal against trucks?

Total Compliance (3 points): In cold stores, coolers and packinghouses this question is only applicable if the facility is fitted with raised dock doors, levelers and buffers. This question should be scored for processors who are handling temperature-controlled items. In a processing audit where goods are not temperature controlled, then this question is only scored if the raised dock doors, levelers and buffers are fitted. Dock buffer seals should be in good condition. Trucks backed onto the dock should seal properly in order to avoid pest entry and maintain temperature control in the shipping area and within the truck. Dock door seals ensure that the product is not exposed to the elements and help prevent pest entry.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of a poorly maintained dock buffer.
- Processing site producing temperature controlled goods that do not use a dock buffer system (or equivalent temperature management system). Counter measures in place.

Major deficiency (1 point) if:

- Numerous instances of poorly maintained dock buffers.
- Processing site producing temperature controlled goods that do not use a dock buffer system (or equivalent temperature management system). Limited counter measure in place.

Non-compliance (0 points) if:

- All dock buffers inspected were poorly maintained.
- Processing site producing temperature controlled goods that do not use a dock buffer system (or equivalent temperature management system). No counter measures in place.

2.24.10: Are dock load levelers and shelters maintained in a good condition, pest proof and debris free?

Total compliance (3 points): This question is only scored where raised dock doors are fitted. Dock levelers are cleaned, pest free and in good repair. Product debris can attract pests to the area. Auditor should inspect under the plates when touring the outside of the facility. Gaskets around dock levelers should fit tightly to prevent pest entry – there should be no gaps.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of improperly maintained shipping dock and levelers.
- Single/isolated instance(s) of a dock leveler not proofed properly against pest entry e.g. fitted with rubber strips.

Major deficiency (1 point) if:

- Numerous instances of improperly maintained shipping docks and levelers.
- Numerous instances of dock levelers not proofed properly against pest entry e.g. fitted with rubber strips.

Non-compliance (0 points) if:

- Systematically observing improperly maintained shipping docks and levelers.

2.24.11: Are exterior walls free of holes to exclude pests? Are pipes, vents, air ducts designed and protected in order to prevent pest entry e.g. by using fine mesh?

Total compliance (5 points): Exterior walls should be maintained. They should be free of holes and deep cracks that could harbor pests. All pipes on the exterior walls should have caps, mesh screens etc., to

prevent rodents and others pests from entering the facility. Vents and air ducts should also be protected to prevent entry of pests. Any screens on the exterior walls, pipe holes, etc. should have mesh size of no greater than 1/8 inch (3 mm) and smaller to limit insect entry.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of an exterior wall having holes or deep cracks that could harbor pests/allow pest entry.
- Single/isolated instance(s) of an exterior wall having uncapped pipes, unprotected vents or wire mesh screens greater than 1/8 inch (3mm).

Major deficiency (1 point) if:

- Numerous instances of areas having exterior walls with holes, and deep cracks.
- Numerous instances of wall having uncapped pipes, unprotected vents, or wire mesh screens greater than 1/8 inch (3 mm).

Non-compliance (0 points) if:

- Exterior walls are not maintained.
- Deep cracks and holes throughout the facility walls.
- Vents, pipes and screens are not designed to keep pests out of the facility.

2.24.12: Are interior walls and ceilings free of cracks and crevices to prevent pest harborage and allow proper sanitation?

Total compliance (5 points): Interior walls should be maintained and be free of holes, and large cracks that can harbor insects and other pests. Pallets and forklift forks are notorious for damaging walls, especially chiller insulation. Damaged walls are difficult to clean and the exposed foam or polystyrene insulation can be a foreign material risk. Exposed insulation can be a contamination harborage area – with heat and water, this becomes an ideal breeding ground for microbes. Ceiling is free from evidence of roof leaks (stains), holes or other damage.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of a finding the issues mentioned above.

Major deficiency (1 point) if:

- Numerous instances of finding the issues mentioned above.

Non-compliance (0 points) if:

- Walls not maintained in an acceptable condition.
- Evidence of ceiling leaks.

2.24.13: Do false ceiling areas have adequate access to allow for inspection and cleaning?

Total compliance (5 points): False ceilings should have adequate access to safely permit monitoring of pest activities and for workers to perform their cleaning duties. Auditor to access these areas and use flash light to assess conformance.

Minor deficiency (3 points) if:

- Single/isolated incidence(s) of an area not having adequate access to safely permit monitoring of pest activities and for workers to perform their cleaning duties i.e. not accessible for inspection.

Major deficiency (1 point) if:

- Numerous incidences of areas having adequate access to safely permit monitoring of pest activities and for workers to perform their cleaning duties i.e. not accessible for inspection.

Non-conformance (0 points) if:

- Systematic failure to have adequate access to safely permit monitoring of pest activities and for workers to perform their cleaning duties i.e. not accessible for inspection.

2.24.14: Is an 18" internal wall perimeter being maintained within the facility, with adequate access to these wall perimeters thereby allowing inspection and cleaning?

Total compliance (5 points): All storage areas should maintain approximately 18" (46 cm) distance between the stored items and all walls i.e. enough room to access and inspect. This space is necessary to prevent harborage of pests, and to allow proper monitoring of pest activity (inspection gap) and for workers to perform their cleaning duties. If you have access and can carry out an inspection, then the space is adequate. Staging areas are not required to conform to these requirements. Auditee should ensure that proper and safe access routes to check the wall floor perimeters are available.

Minor deficiency (3 points) if:

- Single/isolated incidence(s) of an area not maintaining required inspection perimeter and/or clearance i.e. not accessible for inspection.

Major deficiency (1 point) if:

- Numerous incidences of areas not maintaining required inspection perimeters or clearance i.e. not accessible for inspection.

Non-compliance (0 points) if:

- Systematic failure to maintain required inspection perimeters or clearance.

2.24.15: Is the exterior area immediately outside the facility free of litter, weeds and standing water?

Total compliance (5 points): Facility grounds should be maintained in a clean and orderly condition to prevent attraction of insects, rodents and other pests. Weeds and grass should be maintained in order to help avoid pest harborage. There should be no excessive standing water and/or foul smelling odors. If there is designated smoking area outside, then there should a disposal can for cigarette butts – butts should not be found on the ground. Car parks should be free from litter, butts, etc., especially if workers are using their cars at break times. When locating a suitable designated smoking area, auditees should consider the need for hand washing prior to returning to the work place.

Minor deficiency (3 points) if:

- Single/isolated instance (s) of an area not maintained properly on the grounds.

Major deficiency (1 point) if:

- Numerous instances of areas not maintained properly on the grounds.

Non-compliance (0 points) if:

- Grounds are not maintained.

2.24.16: Are control measures being implemented for the storage of pallets, equipment, tires etc. (i.e. out of the mud, pipe ends capped, stacked to prevent pest harborage, away from building perimeter)?

Total compliance (5 points): Outdoor storage of equipment is acceptable provided that it is stored in a manner that will prevent the harborage of pests. Pipes should have the ends capped. Equipment on pallets should not have direct contact with the dirt. All items stored should be at least 4 inches (10 cm) above the ground. Equipment should be neatly stacked. The equipment stock levels should be reviewed regularly in order to avoid building up a store of obsolete equipment. Outside equipment stores should be

checked as part of the pest control program, looking for evidence of rodent harborage. Equipment, tires, pallet storage, etc., should be at least 24 inches (61 cm) away from the building perimeter.

National Pest Management Standards, Pest Management Standards for Food Plants
http://www.npmapestworld.org/documents/Foodplantstandards2010_000.pdf

Minor deficiency (3 points) if:

- Single/isolated instance(s) of equipment not stored properly.
- Excessive storage of old obsolete equipment.

Major deficiency (1 point) if:

- Numerous instances of improper storage of equipment.
- Outside equipment storage is not being checked as part of the pest control program.

Non-compliance (0 points) if:

- No provisions are made to keep equipment from harboring pests.
- Evidence of pest infestation e.g. multiple occurrences of fecal contamination, nests and live pests.

2.24.17: Are pallets inspected to separate and replace dirty or broken pallets?

Total compliance (5 points): Pallets should be maintained in a clean, intact condition, free from mold, pests, or any evidence of pests, food residues, harmful odors, chemical spillage, etc. Washed pallets should be dried prior to use. Broken and/or dirty pallets should be separated for cleaning, repair or return. Broken or dirty pallets should not be used. Auditors should look for broken pallets in the facility, especially in the storage areas. Auditors should look for evidence of pallet segregation by asking to see where the broken pallets are stored.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of broken or dirty pallet(s) in use for raw or packaged product.
- Single/isolated instance(s) of broken and dirty pallet(s) being stored together with pallets in good condition.

Major deficiency (1 point) if:

- Numerous instances of broken or dirty pallets in use for raw or packaged product.
- Numerous instances of broken and dirty pallets being stored together with pallets in good condition.

Non-compliance (0 points) if:

- Systematic failure to separate dirty or broken pallets from good pallets.

2.24.18: Is the area around the dumpster/cull truck/trash area clean?

Total compliance (3 points): The area around the dumpster/cull truck/trash area should be maintained in a clean condition. There should not be any spillage on the ground. There should not be any standing water/liquid seepage around the dumpster/cull truck/trash area and there should not be any foul odor present. The dumpster/cull truck/trash area should be cleaned on a regular basis.

Minor deficiency (2 points) if:

- Minor amount of debris around the dumpster(s)/cull truck/trash area.

Major deficiency (1 point) if:

- Major amount of debris around the dumpster(s)/cull truck/trash area.
- Strong odor around dumpster/cull truck/trash area.
- Visible liquid leakage from the dumpster(s)/cull truck/trash area.

Non-compliance (0 points) if:

- Evidence of old trash and spillage around the dumpster/cull truck/trash area, indicating that spills are not cleaned up as they happen.
- Evidence of insects or other pests in or around dumpster/cull truck/trash area.

2.24.19: Are outside garbage receptacles and dumpsters kept covered or closed?

Total compliance (5 points): All dumpsters and garbage receptacles should have a cover and be kept covered to prevent the attraction of insects, rodents and other pests. Fine mesh lids are acceptable. Just having the lids is not acceptable i.e. when not in use the dumpsters and garbage receptacles should be closed. Dumpsters that are only used for dry non-food waste, e.g. paper, cardboard, etc., are exempt.

Minor deficiency (3 points) if:

- Dumpster(s)/garbage receptacle(s) have covers, but they are not being used.

Major deficiency (1 point) if:

- In the case of operations with multiple dumpsters/garbage receptacles, the majority have covers and are covered, but some are lacking covers.

Non-compliance (0 points) if:

- In the case of operations with multiple dumpsters/garbage receptacles, the minority have covers and are covered, but majority are lacking covers.
- All garbage dumpsters/receptacles lacking covers.

2.24.20: Are all water lines protected against back siphonage?

Total compliance (5 points): Main water lines entering the facility should be fitted with back-flow protection for the incoming water (no matter what source). Individual water lines within the facility should be fitted with backflow protection where needed e.g. on hose pipes, inlets to tanks, etc. The auditor should look for check valves, air gaps and also look for inlet pipes that are submerged below the wash tank fill lines. Water drawn back to into the mains water system can contaminate fresh water. Where facility has a current certificate of inspection on file (scored under 2.27.09), auditor should still look for issues within the facility (inlet pipes below wash tank fill lines, dead end on water lines, hoses not in water tanks or on floor, etc.) that may be an issue. Where the site does waste treatment, check for dedicated back flow between waste treatment and site.

http://water.epa.gov/infrastructure/drinkingwater/pws/crossconnectioncontrol/crossconnectioncontrol_manual.cfm

<http://water.epa.gov/drink/>

Minor deficiency (3 points) if:

- Single/isolated instance(s) of a minor incoming water line that is not protected in some way e.g. hose pipe, lacking an air gap for a dump tank inlet.

Major deficiency (1 point) if:

- Numerous instances of minor incoming water lines that are not protected in some way e.g. hose pipe, lacking an air gap for a dump tank inlet.

Non-compliance (0 points) if:

- Facility officials do not know if there is back flow protection.
- Documentation of back flow protection will be scored under 2.27.09.
- There is no primary mains water backflow protection.

- Waste discharge lacks back flow protection.

2.24.21: Is the on-site laboratory (where appropriate) completely enclosed and separated from production and storage areas?

Total compliance (5 points): To prevent possible contamination from the laboratory, on-site laboratories should be separated from production and storage areas, vented directly to the outside and under negative pressure. Pathogen analyses should ideally be subcontracted to an external testing laboratory. All toxic supplies should be properly labeled; laboratory and laboratory supplies should be restricted to designated personnel only. All waste (including bio hazardous waste) should be properly and safely disposed of, including spent media, laboratory consumables, etc. If retorts are used then full monitoring and calibration service records to be available for review. Where applicable, any national or local regulations regarding the use of on-site labs are to be followed, including any special licensing requirements and regulatory inspections/accreditation. Inspection and accreditation records are to be available for review. Where there is not an on-site laboratory, score N/A.

Minor deficiency (3 points) if:

- Single incident of a door being left open.
- Single incident of laboratory and/or supplies not restricted to designated personnel (e.g. lacking signage).
- Single/isolated incident(s) of toxic supplies not being properly labeled.

Major deficiency (1 point) if:

- Laboratory is not sufficiently separated from production and/or storage areas. There may be a threat to product or packaging.
- Laboratory is not vented directly to the outside and/or not under negative pressure.
- Numerous incidents of toxic supplies not being properly labeled.

Non-compliance (0 points): if one of the following:

- Laboratory is not sufficiently separated from production and/or storage areas. There may be a threat to product or packaging from a serious food safety threatening contaminant.
- Pathogen analyses are being done on-site without adequate precautions.

Chemical Files

2.25.01: Are copies of all Safety Data Sheets (detergents, sanitizers, pesticides, etc.) on file and fully accessible at all times with clear indexes?

Total compliance (5 points): Safety Data Sheets (SDS, formerly MSDS) are available for all chemicals e.g. pest control, cleaning, maintenance (especially those used on line) and sanitizing chemicals, etc. used in the facility. When purchasing or selecting cleaning and maintenance materials that come into direct contact with product (including materials used on food contact surfaces), facility purchases or selects materials that are appropriate for their intended use. Choose a sample of at least three chemicals while on the plant tour to check against SDS file. SDS are accessible at all times and are stored in the appropriate departments. The filing system is organized, for quick access to information. Computer records e.g. SDS stored on memory stick, CD or computer are allowed if auditee can demonstrate they are readily accessible to workers. Only SDS for products which are used at the plant should be included in the "active" file. Ideally have copies of regulatory approvals (where available) on file for cleaners and chemicals that are used on items that come in direct contact with product.

CDMS Label / SDS Information, <http://www.cdms.net/manuf/manuf.asp>
SDS Databases, <http://www.msdssearch.com/DBLinksN.htm>

Minor deficiency (3 points) if:

- SDS are available but filing system is not organized e.g. tabulating, indexing etc., in manner that allows for easy navigation.
- Single/isolated instance(s) of missing SDS's for a chemical that is currently being used.
- Limited access to SDS's for workers using the chemicals.

Major deficiency (1 point) if:

- Numerous instances of missing SDS's for chemicals that are currently being used.

Non-compliance (0 points) if:

- No SDS are on file.
- The use of a chemical that is not regulatory approved for use on food contact surfaces.
- The use of a chemical that is not appropriate for its intended use.

2.25.02: Are there copies of specimen labels for chemicals used, where the full label is not immediately accessible e.g. rodent chemicals, product sanitizers?

Total compliance (5 points): Specimen labels should be available for chemicals (pesticides, cleaning and sanitizing chemicals, etc.) that are decanted out of their original containers. Examples include rodent bait, cleaning chemicals, liquid soap packs, hand dip solutions etc. Specimen labels are important, since if for some reason there is a need to find a label of a decanted/diluted concentrate, then this can be done at speed. Specimen labels might be kept on file (or stored on memory stick, CD or computer are allowed if auditee can demonstrate they are readily accessible to workers) and/or be displayed in an accessible area in the plant, e.g. clipped to hose pipes. Not applicable if all chemicals are used in the presence of the full label on the container. Only labels for products are used at the plant should be included in the "active" file.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of missing specimen label(s) for a decanted chemical(s) that is/are currently being used.

Major deficiency (1 point) if:

- Numerous instances of missing specimen labels for decanted chemicals that are currently being used.

Non-compliance (0 points) if:

- No specimen labels for decanted chemicals being used.

2.25.03: Is there a chemical inventory and/ or usage log?

Total compliance (3 points): Chemical usage logs and/or chemical inventories should be on file. Chemicals within the scope of this question are to be limited to cleaners and sanitizers i.e. sanitation chemicals and food contact chemicals such as chlorine for water flumes, hydrocoolers, etc. The inventory should take into account the arrival of new stocks and any discrepancies should be explained. Minimum frequency for inventory checks should be monthly.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of missing chemical usage logs and/or inventories.
- Single/isolated instance(s) of omission(s) or error(s) in the chemical usage logs and/or inventories.
- Single/isolated instance(s) of new deliveries not being accounted for.
- Single/isolated instance(s) of minimum inventory frequency not being maintained (if usage logs are not being utilized).

Major deficiency (1 point) if:

- Numerous instances of missing chemical usage logs/inventories.
- Numerous instances of omissions or errors in the chemical usage logs and/or inventories.
- Numerous instances of new deliveries not being accounted for.
- Numerous instances of minimum inventory frequency not being maintained (if usage logs are not being utilized).

Non-compliance (0 points) if:

- No chemical usage logs/inventories are on file.

2.25.04: Are there specific Standard Operating Procedures (SOPs) for the changing and testing of water and ice systems e.g. washing flumes, hydrovacuums, hydrocoolers, ice making machines, ice injectors, etc.?

Total compliance (10 points): Ice and water systems should have specific SOPs which describe the process of changing the water and performing and recording anti-microbial sanitizer strength testing (including parameters, frequency of testing, methodology and corrective action requirements). There should be documentation that validates the water changing frequency and water testing frequency. This question is not asked in the Storage and Distribution Audits.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors or omissions within the SOPs for water changing and testing relating to water and ice systems.
- Single/isolated instance(s) of errors or omissions in the validation documentation for water changing and testing relating to water and ice systems.

Major deficiency (3 point) if:

- Numerous instances of errors or omissions within the SOP's for water changing and testing relating to water and ice systems.
- Numerous instances of errors or omissions in the validation documentation for water changing and testing relating to water and ice systems.

Non-compliance (0 points) if:

- SOPs for water changing and testing relating to water and ice systems do not exist.
- SOPs do not address the frequency of water changing and/or testing.
- There is no validation documentation for water changing frequency and/or water testing frequency.

Pest Control Documentation

2.26.01: Is there a documented pest control program, including a copy of the contract with the extermination company (if used), Pest Control Operator license(s) (if baits are used) and insurance documents?

Total compliance (15 points): There should be a documented pest control program in place detailing scope of the program, target pests and frequency of checks. If performed in-house the pest-control operators or equivalent should be registered, licensed or have documented formal training (if regulation does not require certification or registration) – note, the persons training and/or license should specify structural pest control or equivalent. Any substitute operator's license credentials should also be on file. If the service is contracted, the pest control contract service/company should be licensed in structural pest control, insured and the contract should be documented (quoting scope of program, types of pests it covers and frequency of visits). Insurance document should ideally name the auditee as "additional insured". When licensing legislation does not apply e.g. in certain countries, there should be evidence of on-going training. Auditors should check documentation for expiry dates.

Minor deficiency (10 points):

- One piece of documentation is not in place or is not current.
- Single/isolated omission(s) in the written program.

Major deficiency (5 points):

- Two pieces of documentation are not in place or are not current.
- Numerous omissions in the written program.

Non-compliance (0 points):

- More than two pieces of documentation are not in place or are not current.
- Written program does not resemble what is happening in practice at all.

2.26.02: Is there a schematic drawing of the plant showing numbered locations of all traps and bait stations, both inside and outside the plant?

Total compliance (10 points): Schematic drawing or trap map is on file, current and details internal and external traps. All devices (e.g. tin cats, Ketch-Alls, bait stations, glue boards, insect light traps, electronic fly killer units, etc.) should be numbered and clearly identified on the map. The numbers should match what is out in the facility. Ideally the map should be dated, since placement will vary over time.

Minor deficiency (7 points) if:

- The location map does not distinguish between the different types of devices.
- Single/isolated instance(s) of trap(s) being missed off the plan.
- Single/isolated instance(s) of trap(s) numbering being incorrect.

Major deficiency (3 points) if:

- Numerous instances of traps being missed off the plan.
- Numerous instances of traps numbering being incorrect.

Non-compliance (0 points) if:

- No map.
- Majority of traps are not included on the map.
- Map does not represent actual physical placement of traps at all.

2.26.03: Are service reports created for pest control checks detailing inspection records, application records, and corrective actions of issues noted (in-house and/or contract)?

Total compliance (10 points): Service reports from the contract pest control company should be available for review if pest control is contracted out. In-house inspection records should be available for review if done in-house. Records should include services performed, date of service, chemicals used (see below), signs of activity and corrective actions, trend reports. Match PCO signature on service logs with licenses/certificates on file. Records should show when electric fly killing unit bulbs are changed. Where the contracted pest control has left their client details of an issue or a recommendation e.g. excessive gap at the bottom of a door, then the client should acknowledge the issue(s) and note corrective action completion(s) where relevant. Specimen labels and MSDS sheets for chemicals used are scored under section 2.3.

Where chemicals are used records should detail:

- Product name of materials applied
- The EPA or product registration number (as required by law)
- Target pest
- Rate of application (percent of concentration)
- Location or site of application

- Method of application (if applicable)
- Amount of pesticide used
- Date and time of application
- Signature of applicator

National Pest Management Standards, Pest Management Standards for Food Plants
http://www.npmapestworld.org/documents/Foodplantstandards2010_000.pdf

Minor deficiency (7 points) if:

- Single/isolated instance(s) of missing or incomplete information/records e.g. pest activity, trap replacement etc.
- Single/isolated instance(s) where contracted pest operators action points have not been acknowledged and completed.
- Single/isolated instance(s) of not noting chemical use details.

Major deficiency (3 points) if:

- Numerous instances of missing or incomplete information/records e.g. pest activity, trap replacement, etc.
- Numerous instances where contracted pest operators action points have not been acknowledged and completed.
- Numerous instances of not noting chemical use details.

Non-compliance (0 points) if:

- No service reports.
- Systematic failure to maintain service reports.
- Systematic failure to record chemical use details.

Operation Monitoring Records

2.27.01: Does the facility have incoming goods (raw products, ingredients and packing materials) inspection data?

Total compliance (5 points): Incoming goods should be inspected for visible issues e.g. decay, foreign materials (contamination), odor, damage and labeling issues and any other safety/food security related issues. Packaging is ideally checked routinely but records can be maintained by exception e.g. as deviation incidents and recorded as unusual occurrences; this is an acceptable practice where issues are rare. Inspection data for products are not required if “own product” e.g. in-house grown commodity, is being packed.

This question is only relevant in the Cooling & Cold Storage and Storage & Distribution audits, where the company sells product. This question is not applicable if acting as a third party storage operation or a co-packer as long as the client(s) utilizing the auditee's service have provided a letter/agreement releasing the auditee from the responsibility of inspecting incoming materials.

Minor Deficiency (3 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.

Major Deficiency (1 point) if:

- Numerous instances of omissions or incorrect data in the records.

Non-compliance (0 points) if:

- No records.
- Failure to maintain records.

2.27.02: Are there inspection logs on incoming trailers for rodents and insects, cleanliness, holes and temperature control?

Total compliance (10 points): There should be written records (separate log or on bill of lading, etc.) of trailer (a.k.a. truck body, lorry body) inspections. Designated personnel should be responsible for inspecting the incoming vehicles and checking/documenting the following:

- Interior is clean, odor free, pest free and in good condition i.e. free of damage.
- Refrigerated vehicles and the products inside are in compliance with specified temperatures.
- Records of rejections and where relevant any corrective actions.

Not applicable if flatbeds are used. Truck cleaning certificates are acceptable as sanitation completion records for in-house trucks in question 2.28.04 and 2.28.06 but do not replace the inspection log requirements of this question. Packaging supply trucks can be recorded by exception but are ideally routinely inspected and recorded.

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.

Major Deficiency (3 points) if:

- Numerous instances of omissions or incorrect data in the records.

Non-compliance (0 points) if:

- No records.
- Failure to maintain records.

2.27.03: Are there records for the necessary process monitoring activities (e.g. pH, water temperature, metal detection, labeling, heating processes, etc.) showing the monitoring frequencies, results and where necessary the corrective actions?

Total compliance (10 points): There should be appropriate logs in use for all process monitoring activities including postharvest treatments. These may be combined on a single log or on multiple logs. The records should include corrective actions to be filled in when the process is outside the established limits. If monitoring is not continuous, then the amount or frequency of monitoring should be sufficient to verify the process is in control; **auditee should be able to support monitoring frequency being used**. Where produce is immersed in water and has been shown to be susceptible to microbial infiltration from water, the water temperature differentials during immersion should be controlled in accordance with current regulation, industry guidelines or best practices. For example for tomatoes FDACS, USDA and the University of Florida-GAPs require postharvest water be maintained at temperatures 10 °F (5.6°C) or higher above the fruit pulp temperature; water temperature should be monitored at least hourly.

Metal detectors should be tested at least hourly. At least ferrous, non-ferrous and stainless steel (usually 316) test pieces should be used separately to test the metal detectors – other specific metal test pieces should be considered if the plant equipment is made out of other materials. Test pieces should be placed as close to the aperture center as possible; embedding test pieces in the product is an ideal method. Discovery of foreign material issues should be recorded along with relevant corrective actions. Note, product washing, metal detection, etc., are often detailed further in the HACCP section.
<http://fshn.ifas.ufl.edu/Food-Safety/commodity/tomato/>

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records and corrective action details.
- Single/isolated instance(s) of omissions or errors in the frequency of monitoring.
- Single/isolated instance(s) of incorrect parameters being monitored.

Major Deficiency (3 points) if:

- Numerous instances of omissions or incorrect data in the records and corrective action details.
- Numerous omissions or errors in the frequency of monitoring.
- Numerous instances of incorrect parameters being monitored.
- No supporting documentation of the monitoring frequency being used.

Non-conformance (0 points) if:

- No records.
- Monitoring frequency is insufficient to verify the process is in control.
- Monitoring parameters in use are insufficient to verify the process is in control.
- Failure to maintain records properly.

2.27.04: Are there records (with corrective actions) that show anti-microbial (e.g. free chlorine, ORP, peracetic acid) strength testing of wash water and ice solutions prior to start up and throughout the production runs?

Total compliance (10 points): Wash water and ice production systems using anti-microbial agents e.g. hypochlorite (chlorine), aqueous chlorine dioxide, peroxyacetic acid (PAA), ozone should have records showing that the strengths of the solutions are within parameters. Recycled/reused water systems (for example, flumes, wash tanks, ice injectors, hyrovacuums, etc.) and single pass systems (e.g. spray bars) should be using an approved anti-microbial (an exception to this requirement can be considered in the case of multi-step wash systems where anti-microbial chemical labels or regulations require a final potable water rinse step). Recycled/reused water systems should be checked by measuring the "free anti-microbial" as opposed to bound microbial e.g. testing for free chlorine (or ORP) as opposed to total chlorine. In single pass systems it is acceptable to measure total chlorine (as per legislation). See links below for data and research on threshold levels for free and total chlorine ORP, peroxyacetic acid (PAA) and pH level parameters. Other anti-microbials e.g. ozone, electrolyzed water, etc., should meet manufacturer recommendations (**auditee should have proof of parameter derivation**) and be approved for use in wash water. Frequency of checks should be relative to the stability of the system, but at least pre-start, then at a frequency that ensures the availability of the anti-microbial is adequate while the system is running. As a minimum guide, a fresh-cut facility should be checked every 30 minutes, whereas

whole washed product water anti-microbial levels should be checked hourly. Corrective actions should also be recorded. These steps may be covered in a HACCP plan (sanitizing of flume water). Any water treatment (e.g. chlorine, reverse osmosis, UV light, active carbon) at the source (e.g. well, canal) should be monitored and records available.

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http://edocket.access.gpo.gov/cfr_2009/aprqr/pdf/21cfr173.315.pdf

<http://onfarmfoodsafety.org/wp-content/uploads/Chlorination-of-Water-for-Fluming-and-Cleaning-Fresh-Fruits-and-Vegetables-and-Cleaning-Equipment.pdf>

UC Davis, <http://ucce.ucdavis.edu/files/datastore/234-406.pdf>

<http://search.nal.usda.gov/bitstream/10113/33618/1/IND44258766.pdf>

UC Davis, http://ucanr.edu/sites/GAP/news/Water_Disinfection/

<http://www.caleafygreens.ca.gov/sites/default/files/California%20LGMA%20metrics%2008%2026%2013%20%20Final.pdf>

http://www.unitedfresh.org/assets/Natl_Cantaloupe_Guidance_Feb_2013.pdf

Minor deficiency (7 points) if:

- Single/isolated instance(s) of records showing solution strength out of parameters without adequate documented corrective actions.
- Single/isolated instance(s) of errors or omission in the records.
- Single/isolated instance(s) of total chlorine being recorded when free chlorine or ORP would have more been suitable e.g. in chlorinated recycled water systems
- Single/isolated instance(s) of checks not carried out at the required frequencies.

Major deficiency (3 points) if:

- Numerous instances of records showing solution strength out of parameters without adequate documented corrective actions.
- Numerous instances of errors or omission in the records.
- Numerous instances of total chlorine being recorded when free chlorine or ORP would have more been suitable e.g. in chlorinated recycled water systems.
- Numerous instances of incorrect parameters being stated.
- Numerous instances of checks not carried out at the required frequencies.
- No supporting documentation of the monitoring frequency being used.

Non-compliance (0 points) if:

- Water/ice testing and water changes are not being recorded.
- Recorded solution strengths systematically out of parameters i.e. an unstable system (even if documented corrective actions exist).
- Systematic errors and omissions in the records.
- Total chlorine has been recorded throughout the system, when free chlorine or ORP should have been recorded e.g. in chlorinated recycled water systems.
- Frequencies of checks systematically do not meet requirements of prior to start up and throughout the production runs.
- No evidence of water anti-microbial parameters has been stated/ incorrect parameters being used.
- Single pass water system is in use without anti-microbial being used (an exception to this requirement can be considered in the case of multi-step wash systems where anti-microbial chemical labels or regulations require a final potable water rinse step). **The auditor should consider whether to apply Q 2.18.05 and score an automatic failure in view of the risk of cross contamination.**
- Recycled/reused water system is in use without an anti-microbial being used. **The auditor should consider whether to apply Q 2.18.05 and score an automatic failure in view of the risk of cross contamination.**

2.27.05: Are there records (with corrective actions) that show anti-microbial strength testing of hand/foot/tool dip stations? Are there stock check and replenishment records for gel and spray stations?

Total compliance (3 points): The company should have a log sheet for evaluating the hand and/or foot and/or tool dip (where appropriate, see applicability chart) stations solution strength. The log sheet should include target anti-microbial concentration (ppm) and frequency of verification. The figures recorded must match the type and graduation of the testing system being used. An omission would include where an out of spec concentration is recorded but there is no record of corrective actions. Foot dips are required in fresh-cut, ready-to-eat processing audits (see 2.19.13). Any operation with hand, foot or tool dips is required to keep monitoring records (uncontrolled dips are a hazard). Where hand gel or spray stations using prepared solutions are used, there should be monitoring logs indicating stations are regularly checked to confirm units are stocked and operational.

Minor Deficiency (2 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.
- Single/isolated instance(s) of dips or stations being omitted from the logs.

Major Deficiency (1 point) if:

- Numerous instances of omissions or incorrect data in the records.
- Numerous instances of dips or stations being omitted from the logs.

Non-compliance (0 points) if:

- No records.
- Failure to maintain records

2.27.06: Is there a tool accountability program for knives and similar cutting hand tools used in the production area?

Total compliance (3 points): There should be an accountability program in place for knives and similar cutting hand tools (e.g. scissors, hand corers, etc.) used in production areas for trimming, etc., to identify potential product contamination. This should include records of inspection of cutting surfaces for wear as well as inventory of quantities in/out on each shift. Production hand tools should remain on-site under the operation's control. Question is non-applicable if knives or other hand tools are not used in the production area or for maintenance tools such as wrenches, screw drivers, etc.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of errors or omissions in the records.

Major deficiency (1 point) if:

- Numerous instances of errors or omissions in the records

Non-compliance (0 points) if:

- There are no records for tool accountability.
- Production hand tools do not remain under the control of the company e.g. taken home by workers.

2.27.07: Is there a daily pre-operation inspection log?

Total compliance (5 points): Food handling departments are inspected daily before operation begins. This should be a start-up check of all potential issues not a repeat of the daily sanitation completion record which is covered in 2.28.06.

The daily pre-operational check should include:

- Examination of equipment to verify cleanliness.
- General housekeeping of storage and production areas.
- Checking that the production line is ready to start safely.
- Checking personnel meet the GMP requirements
- Corrective actions in case of non-compliance.

Basically a last minute quick check that all is well and the production can start. Use of rapid testing, e.g., ATP measuring equipment, is something an auditor should note in the comments and if used, auditor must check to ensure that the results and corrective actions are being recorded correctly (see question 2.28.08).

Minor Deficiency (3 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.

Major Deficiency (1 point) if:

- Numerous instances of omissions or incorrect data in the records.
- Persistent repetition of corrective action without long-term solution.

Non-compliance (0 points) if:

- No records.
- Failure to maintain records.

2.27.08: Has a documented risk assessment been performed to ensure that any food safety hazards relevant to facility location and adjacent land use are identified and controlled?

Total compliance (10 points): There should be a documented risk assessment for the facility to identify and control food safety hazards relevant to facility location and adjacent land use e.g. animal activity, industrial activity, waste water treatment sites (settling ponds, land applications, etc.) or any other potential sources of contamination. All national and local laws pertaining to land use and on-site water treatment systems should be followed. Where necessary, for waste water treatment areas, there should be applicable permits on file and evidence of regulatory and/or third party inspections.

A detailed risk assessment should have been conducted and **documented**.

One approach:

- i) identify hazards.
- ii) Determine who may be harmed and how
- ii) evaluate the risks and decide on actions to control the risks
- iv) Document findings and implement actions
- v) Review and update assessment as necessary

http://www.fsc.go.jp/sonota/foodsafety_riskanalysis.pdf

<http://www.p2pays.org/ref%5C05/04874.pdf>

<http://water.epa.gov/infrastructure/watersecurity/>

http://water.epa.gov/infrastructure/sustain/upload/2009_05_26_waterinfrastructures_tools_si_watereum_primerforeffectiveutilities.pdf

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors or omissions on the risk analysis

Major deficiency (3 points) if:

- Numerous instance(s) of errors or omissions on the risk analysis

Non-compliance (0 points) if:

- Multiple systematic errors on the risk analysis
- No documented risk analysis

2.27.09: Is there a current certificate of inspection for backflow prevention assemblies on water lines into the facility?

Total compliance (3 points): There should be a backflow prevention device on main water lines entering the facility and backflow prevention devices on individual water lines within production areas. A trained inspector (e.g. appropriately certified plumber) should verify the principle backflow prevention system

annually (unless there is a stated expiration on the certificate). Wells are also required to have backflow prevention devices to prevent cross connection or backflow during pump priming or maintenance. This question is still applicable even if local and/or national legislation does not require this type of inspection/testing. If the valve type is one that cannot be inspected or tested then auditee should have documentation supporting this on-site e.g. valve manufacturer's documentation.

http://www.ccdeh.com/documents/doc_view/152-california-plan-check-guide-for-retail-food-facilities
<http://www.usc.edu/dept/fccchr/>
<http://www.mindspring.com/~loben/water.htm>

Minor deficiency (2 points) if:

- Last inspection and certification was done over a year ago, but not greater than 18 months ago.

Major deficiency (1 point) if:

- Last inspection and certification was done over a year ago, but not greater than 24 months ago.

Non-compliance (0 points) if:

- Last inspection and certification was done over 24 months ago.
- No inspection or certification records.

2.27.10: Is there documented evidence of the internal audits performed to the audited operations, detailing findings and corrective actions?

Total compliance (10 points): There should be records of the internal audits performed at each operation with the frequency defined in the program. Frequency depends on type and size of operation; auditors discretion. Processing plants should have at least a monthly frequency. Packinghouses, coolers and storage operation ideally have a monthly frequency, but at least a quarterly frequency.

The records should include: date of the audit, name of the internal auditor, justification for the answers, detailing any deficiencies found and the corrective actions taken. An audit checklist should be used in each operation as an aid to make sure the inspection covers all areas.

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of follow up/corrective actions not noted.
- Single/isolated instance(s) of incomplete or missing records.
- Single/isolated instance(s) of areas/issues missing on the inspection program.

Major Deficiency (3 points) if:

- Numerous instances of follow up/corrective actions not noted.
- Numerous instances of incomplete or missing records.
- Inspection frequency is not adequate relative to the type of business and the number of issues that require monitoring.
- Numerous instances of areas/issues missing on the inspection program.

Non-conformance (0 points) if:

- Systematic failure to maintain records.

Maintenance & Sanitation Files

2.28.01: Does the facility have a preventative maintenance program and schedule?

Total compliance (10 points): There should be a formal preventative maintenance program for the whole operation including production and ancillary equipment, facility structure and fittings. Equipment includes for example production line equipment, cooling equipment, compressed air equipment, water treatment equipment, etc. The maintenance program should have a schedule showing routine inspections, lubrications, part replacements etc. at appropriate frequencies (daily, weekly, monthly, etc.). There should

be preventative maintenance completion records. All records are kept on file and organized in an easily retrievable manner (including any database systems). In complex operations (e.g. juice processors), auditor can choose specific pieces of equipment to check the planned maintenance schedules and completion records for the chosen pieces of equipment.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of incomplete records.
- Single/isolated instance(s) of pieces of equipment missed off the schedule.
- Minor improvements are required in filing or organization of records.

Major deficiency (3 points) if:

- Numerous instances of incomplete records.
- Numerous instances of pieces of equipment missed off the schedule.
- Files are not easily retrieved and poor filing practices.

Non-compliance (0 points) if:

- No program.
- Systematic failure to maintain records.

2.28.02: Is there a log of maintenance work or repairs ordered and is it signed off on work completed?

Total compliance (10 points): There should be a log for repairs/ maintenance service orders/ work orders and completion of work. This log may include: date/ time, targeted equipment/ area, reason for service required, who is requesting, who is being informed, observations; date & signature when repair is completed. Logs are kept on file in an easily retrievable manner.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of incomplete records.
- Minor improvements are required in filing or organization of records.

Major deficiency (3 points) if:

- Numerous instances of incomplete records.
- Files are not easily retrieved and poor filing practices.

Non-compliance (0 points) if:

- No logs are on file.
- Systematic failure to maintain records.

2.28.03: Are there logs showing that equipment is cleaned and sanitized after maintenance work has been completed?

Total compliance (5 points): The company keeps records of all maintenance work and signature of a designated worker to confirm that the equipment has been sanitized after maintenance work has been completed and before being used again. If the equipment has been worked on in the production area (as opposed to being transferred to the maintenance shop), then the area surrounding the recently maintained equipment should also be sanitized (records of this sanitation should be maintained).

Minor Deficiency (3 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.

Major Deficiency (1 point) if:

- Numerous instances of omissions or incorrect data in the records.

Non-compliance (0 points) if:

- No records.
- Failure to maintain records.

2.28.04: Is there a written cleaning schedule (Master Sanitation Schedule) that shows what and where is to be cleaned and how often?

Total compliance (10 points): The company should have a master sanitation program that covers the entire area of the facility including equipment. The schedule should state what is to be cleaned and when (how often). Areas should include where applicable, processing, packing, product storage, dry storage, waste areas, restrooms and break areas. Within these listings there should be details like floors, walls, light covers, pipes, ceilings, evaporators, cooling coils, drip pans, drains, drain lines and reservoirs, named equipment and equipment parts and surfaces; including internal transport vehicles (forklifts, Bobcats, floor cleaners, pallet jacks, etc.). Floor cleaners should be kept in good condition and cleaned in order to prevent cross contamination. Where relevant, the brushes and fixtures on the floor cleaner may need to be changed or cleaned when moving from one risk area to another. In-house delivery and shuttle trucks should be included in sanitation schedules, have SSOPs and cleaning records.

Infrequent schedules i.e. weekly and above, are usually created for several reasons e.g. cleaning areas and equipment that are not cleaned daily, using a different cleaning technique/chemical than what is used on a daily schedule and/or doing a more “in depth” clean on equipment. Note that all cleaning mentioned on the schedule should be covered somewhere in the cleaning procedures and also on the sanitation logs. Schedule should be kept on file in an easily retrievable manner.

Master sanitation schedule should include what is to be cleaned and when, i.e.:

- List of areas, equipment, internal transport vehicles, in-house delivery trucks, etc.
- Frequency of cleaning (daily, weekly, monthly, quarterly, annually, etc.)

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors or omissions in the schedules i.e. missed areas/equipment (including internal transport vehicles, in-house delivery trucks) and/or no frequencies being set.

Major deficiency (3 points) if:

- Numerous instances of errors or omissions i.e. missed areas/equipment (including internal transport vehicles, in-house delivery trucks) and/or no frequencies being set.

Non-compliance (0 points) if:

- No schedules.
- Schedules exist but they are not reflecting what actually occurs.

2.28.05: Are there written cleaning procedures (Sanitation Standard Operating Procedures) for the facility and all equipment?

Total compliance (10 points): There should be written cleaning and sanitation procedures for all equipment and areas. These are also called Sanitation Standard Operating Procedures (SSOP's). This includes production line equipment (named equipment and equipment parts and surfaces), floors, walls, light covers, pipes, ceilings, evaporators, cooling coils, drip pans, drains, drain lines and reservoirs, internal transport equipment (e.g. forklifts, Bobcats where shovels come into contact with ingredients such as ice, pallet jacks, trolleys, floor cleaners, etc.). In-house delivery and shuttle trucks should be included in sanitation schedules, have SSOPs and cleaning records. A surface cannot be properly sanitized unless it is effectively cleaned. Use of a sanitizer is required unless there are justified exceptions that are fully

documented. Procedures should respect the label (e.g. rinse/no-rinse, sanitizers, dwell time, etc.) and match operations noted on the master sanitation schedule (2.28.04). These procedures should include: -

- Responsibility for cleaning with cleaning methods
 - Item/area to be cleaned
 - Frequency of cleaning
 - Safety precautions (tag outs, personnel safety with respect to chemicals, etc.)
 - Chemical (name, dilution and water temperature requirements) and utensils used).
 - Specific preparation procedures regarding dilution (unless purchased as ready-to-use) for the specific chemicals or sanitizers being used and verification testing instructions and records (where appropriate)
 - Detailed cleaning and sanitation methods
 - Following the standard order:
 1. Dry clean (note equipment used)
 2. Rinse (note equipment used)
 3. Clean (note equipment used)
 4. Rinse (note equipment used)
 5. Sanitize (note equipment used and dwell time)
 6. Rinse (if label requires)
 - Special instructions with respect to cleaning
 - Responsible person
 - Logs/records of cleaning and responsibility for verification
 - Verification procedures (visual, ATP, microbial) and acceptance criteria
- http://www.extension.org/pages/27405/industry-guidelines-to-prevent-contamination-from-listeria-monocytogenes#General_plant_sanitation

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors and omissions within the SSOPs.
- Single/isolated instance(s) of omitted procedure(s) for a piece of equipment, internal transport vehicle or facility area.

Major deficiency (3 points) if:

- Numerous instances of errors and omissions within the SSOPs.
- Numerous instances of omitted procedures for a piece of equipment, internal transport vehicle or facility area.

Non-compliance (0 points) if:

- No written procedures have been developed.
- Procedures exist but they are not reflecting what actually occurs.

2.28.06: Are sanitation logs on file that show what cleaning was done, when and who carried out the cleaning?

Total compliance (5 points): The company has sanitation logs that cover the entire area of the facility and equipment. Logs are kept on file in an easily retrievable manner. The logs should be cross-checked against the master sanitation program (2.28.04). Logs of infrequent cleaning should be checked. Logs should include:

- Date
- List of areas/equipment that have/has been cleaned
- Individual accountability and sign-off for each task completed
- Verification of task completed.
- Any deviations against the set SSOP's

Minor deficiency (3 points) if:

- Single/isolated instance(s) of incomplete records, discrepancies against the master sanitation schedule or other omissions.

Major deficiency (1 point) if:

- Numerous instances of incomplete records, discrepancies against the master sanitation schedule or other omissions.
- Missing infrequent cleaning logs.

Non-compliance (0 points) if:

- No sanitation logs.
- Sanitation logs exist but they are not reflecting what actually occurs.

2.28.07: Are there documented procedures and completion records for clean-in-place (CIP) activities, where applicable (e.g. cleaning re-circulating water systems such as washing flumes, ice injectors, hydrocoolers, ice makers, etc.)?

Total compliance (5 points). Where operations utilize clean-in-place (CIP)* e.g. as part of the process of cleaning re-circulated flume system pipes and pumps, should have detailed procedures in place. CIP activities should be monitored to ensure CIP process is effective and not a source of contamination to product. The CIP procedure should be detailed and include:

- Identity of equipment to be cleaned
- Frequency of cleaning
- Safety precautions (tag outs, personnel safety with respect to chemicals, etc.)
- Chemical name, dilution requirements and concentration testing
- Specific preparation procedures regarding dilution (unless purchased as ready-to-use) for the specific chemicals or sanitizers being used and verification testing instructions and records (where appropriate).
- Detailed cleaning and sanitation methods following the standard order:
 1. Dry clean (note equipment used)
 2. Rinse (note equipment used)
 3. Clean (note equipment used, any dwell times)
 4. Rinse (note equipment used)
 5. Sanitize (note equipment used and any dwell times)
 6. Rinse (if label requires)
- Special instructions with respect to cleaning
- Assigned responsibility for each task
- Logs/records of cleaning
- Verification procedures (visual, ATP, microbial) and acceptance criteria.
- Required temperatures for chemical dilutions used
- Required flow rates and dwell/cycle times for the CIP process
- Specific details on how re-circulated chemicals are drained and rinsed out of the CIP system (so avoiding contamination issues)

The chemical label details, equipment manufacturer's instructions and company safety rules are to be followed. Records of CIP cleaning should be maintained.

*Clean In Place (CIP) – an equipment cleaning procedure that occurs with all the equipment left “in place” and a cleaning program of some kind occurs. This procedure is sometimes part of larger procedure where equipment is partially cleaned in some way while still assembled and then broken down for a deeper clean before being assembled again and then “flushed” through (clean in place).

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors and omissions within the SSOPs.
- Single/isolated instance(s) of omission(s) in procedure or records for a piece of equipment or facility area.

Major deficiency (3 points) if:

- Numerous instances of errors and omissions within the SSOPs.
- Numerous instances of omissions in procedure or records for a piece of equipment or facility area.

Non-compliance (0 points) if:

- No written procedures have been developed.
- There are no records.
- Procedures exist but they do not reflect what actually occurs.

2.28.08: Is there a routine program and written procedure to validate sanitation effectiveness using rapid post sanitation checks, e.g., ATP measurements?

Total compliance (5 points): Rapid post sanitation checks, e.g., ATP (adenosine tri phosphate) testing, provides an instant indication of the hygiene status of product contact surfaces by measuring the ATP from food residues, bacteria, yeast, mold - either living or dead (i.e. all organic matter) so giving a measure of cleaning effectiveness. There should be a procedure detailing sampling strategy, standardized sampling technique including location of sample and time of sampling and there should be pass/fail parameters. For example, the detection of non-specific ATP provides a reliable quick indicator of cleaning efficiency and hygienic status (therefore a good pre-operational tool) but for the purpose of this audit is not a replacement for specific microbiological testing or for ensuring that the allergen specific proteins have been removed from a production surface. This question application is similar to that laid out in 2.30.01. If there are no food contact surfaces, or products/processes are deemed not applicable using the 2.30.01 criteria, then N/A may be scored. Ideally, the incubation of pathogen specific rapid tests does not occur on site; where this does occur the auditee must follow the rapid test manufacturer's instructions regarding disposal and have records to show this is occurring (autoclave use and calibration, sanitizer strength and duration, etc.).

[http://www.foodquality.com/details/article/807321/ATP Bioluminescence Moves Mainstream.html?tzcheck=1](http://www.foodquality.com/details/article/807321/ATP%20Bioluminescence%20Moves%20Mainstream.html?tzcheck=1)

Minor deficiency (3 points) if:

- Single/isolated instance(s) of equipment being missed off the swabbing schedule, incorrect frequency.
- Single/isolated instance(s) of a record or records showing high counts relative to threshold but no corrective action documentation.
- Single/isolated instance(s) of errors or omissions in the procedure.

Major deficiency (1 point) if:

- Numerous instances of equipment being missed off the swabbing schedule, incorrect frequency.
- Testing is sporadic and not on a scheduled basis.
- Numerous records showing high counts relative to threshold but there are no corrective actions documented.
- Numerous instances of errors or omissions in the procedure.

Non-compliance (0 points) if:

- There are no records of equipment ATP testing.
- There is no procedure for sampling strategy, technique or threshold limits.

2.28.09: Is there a log indicating that floor drains are cleaned on a regular basis (minimum daily in wet and fresh-cut production areas)?

Total compliance (5 points): There is a log that indicates that floor drains are cleaned on a daily basis in wet packinghouse areas and fresh-cut processing areas. Wet storage areas drains should be cleaned daily. Auditors should use their discretion when auditing dry facilities, but the minimum drain cleaning frequency should be weekly.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of incomplete records or omissions.

Major deficiency (1 point) if:

- Sanitation schedule or log does not indicate that floors and drains are cleaned; but sanitary condition of floor and drains is checked every day on the pre-operation inspection.
- Numerous instances of incomplete records or omissions.

Non-compliance (0 points) if:

- There is no written evidence (schedule or log) that floor drains are cleaned.

2.28.10: Are there records showing cooling units are serviced and cleaned at least every 12 months or more frequently as required?

Total compliance (10 points): Records should be made available to verify that the cooling units are serviced and cleaned on a scheduled basis. Records might include in-house sanitation records, maintenance records and/or contractor records/invoices. Note contracts, invoices etc., must clearly state the services provided as per any other record. A cleaning and servicing at least once in the last 12 months is a minimum requirement, but usually frequency is higher, especially in high humidity/wet operations and also with chiller units that are known to become dirty at a faster rate than others, e.g. next to open doors.

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.

Major Deficiency (3 points)

- Numerous instances of omissions or incorrect data in the records.

Non-compliance (0 points)

- No records.
- Failure to maintain records.

2.28.11: Is there a documented glass management policy and procedure (including company glass policy, glass breakage procedure and where necessary glass register)?

Total compliance (5 points). There should be a written glass and brittle plastic policy and procedure, which should state: -

- Where glass is prohibited and where glass is allowed.
- Policy should state how workers should report missing or broken spectacles or contact lenses and to whom they report the issue.
- If certain glass items are allowed, then a glass register should exist describing each item, location and quantity. The glass register should only list items that could not be replaced with a less dangerous material. The glass register should not be abused by allowing glass items on site that are usually viewed as poor GMP e.g. allowing glass drinking bottles into production areas, unprotected glass light bulbs. Glass register items should be checked on a routine basis (at least monthly) to ensure they are not damaged/cracked etc. Checks should be documented.

- Glass breakage procedure including requiring recording what happened, recording what happens to potentially affected product, recording future preventative actions and especially where to record the incident details e.g. in the NUOCA log.
- Clean-up procedure after glass breakage should indicate what equipment to use and include boot and tool checks/decontamination procedures to ensure broken glass is not unintentionally transported out of the area.

Minor deficiency (3 Points) if:

- Policy lacks an element listed above.
- Single/isolated instance(s) where glass breakage details have not been recorded properly.
- Single/isolated instance(s) of glass register items not being checked on a routine basis.

Major deficiency (1 point) if:

- Policy lacks more than one element noted above.
- Numerous instances where glass breakage details are not being recorded properly
- Numerous instances of glass register items not being checked on a routine basis.

Non-compliance (0 points) if:

- No policy exists
- There has been a glass breakage but no records exist.
- Systematic failures to check glass register items on a routine basis.

Worker Documentation

2.29.01: Are there records of new worker food safety (GMP) orientation training (with topics covered and attendees) and are all workers required to sign the company's food safety hygiene and health policy?

Total compliance (10 points): The company has logs of GMP orientation (new hire) training with the topics covered, trainer name and materials used and given to new hires. Training should be given prior to new hires starting to work. Materials to be given to new hires after training should be in the relevant language(s) and cover key GMP rules including hand washing, eating/drinking, smoking, specific clothing rules, foreign material issues (including jewelry, false finger nails, finger nail polish, etc.), cuts/wounds and illness rules, etc. Food safety training should be given to all workers working in the production and storage areas; this includes temporary workers and agency workers. All workers should be requested to read (in the relevant language), confirm they understand and agree to abide by the company's food safety policy rules regarding personal hygiene/GMPs and health requirements (e.g. they are free from diseases that might be a food safety cross contamination risk). A copy of the signed food safety policy should be kept on file and a copy given to the worker.

Minor Deficiency (3 points) if:

- Single/isolated instance(s) of errors and omissions in the records or food safety hygiene and health policy.
- Up to three points missing off the GMP requirements listing.
- Training materials and/or food safety policy are not in the relevant language(s).
- Training occurring but relevant materials are not being given to the trainee after the training.
- Training occurring, not before starting to work but within the first week.
- Single/isolated instance(s) of workers not being trained or not signing a document stating that they will comply with the operations' personal hygiene and health policies

Major Deficiency (1 point) if:

- Numerous instances of errors and omissions in the records or food safety hygiene and health policy.
- Over three points missing off the GMP requirements listing (or GMP listing does not exist).

- Numerous cases of workers not signing a document stating that they will comply with the operations' personal hygiene and health policies.
- Training occurring, not before starting to work but within the first month.
- Numerous instances of workers not being trained.

Non-compliance (0 points) if:

- No records of training or workers not being trained.
- No specific orientation given or given after the worker has been working for more than one month.
- Failure to maintain records.
- The company does not have a document for workers to sign stating that they will comply with the operations' personal hygiene and health policies.
- Systematic failure of workers to sign a log stating that they will comply with the operations' personal hygiene and health policies.

2.29.02: Are there logs of ongoing worker food safety education training with topics covered and attendees?

Total compliance (10 points): The auditee should have logs of ongoing food safety educational training with clearly defined food safety topic(s) covered, trainer(s) and material(s) used/given. There should be logs of workers who have attended each session. Food safety training might be part of other training events e.g. part of occupational training. Some kind of food safety training of workers should occur on at least a quarterly basis, but ideally monthly. Full annual food safety refresher training sessions are encouraged but do not replace the ongoing more frequent training unless a short season facility e.g. less than 3 months duration. Ongoing training might focus on key areas e.g. hand washing, eating and drinking, foreign material control, etc., maybe note issues found in recent internal and external audits, e.g. wearing beard nets, jewelry issues.

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information.
- Training has occurred but on a few occasions full attendance logs have not been kept and/or not all personnel were covered.

Major Deficiency (3 points) if:

- Numerous instances of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information.
- Training has occurred but on many occasions full attendance logs have not been maintained.
- Some key topics e.g. hand washing, have been omitted from the training.
- Only annual refresher training has occurred and the operation runs for more than 3 months of the year.

Non-compliance (0 points)

- Failure to maintain records. No records of training/
- Many major topics have been omitted from the training program e.g. hand washing, eating/drinking rules, jewelry policy etc.

2.29.03: Is there a documented training program with training logs for the sanitation workers including best practices and chemical use details?

Total compliance (5 points): Sanitation training should ensure that the workers understand the importance of proper sanitation; cleaning efficacy, how to use the cleaning chemicals and how to understand Sanitation Standard Operating Procedures. Training would also ideally include worker safety issues, e.g. use of personal protective equipment, accident prevention, what to do in case of an accident, procedures

for avoiding electrical hazards when cleaning, etc. Recorded training should occur at least on a 12 monthly basis.

Minor Deficiency (3 points) if:

- Single/isolated instance(s) of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information.
- Training has occurred but on a few occasions full attendance logs have not been kept and/or not all personnel were covered.

Major Deficiency (1 point) if:

- Numerous instances of logs having error
- Numerous instances of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information.
- Training has occurred but on many occasions full attendance logs have not been maintained.

Non-compliance (0 points)

- No records or no training has occurred.
- Failure to maintain records.

2.29.04: Are there written procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering any illnesses that might be a contamination risk to the products being produced? (In the US, auditors can check procedure/policy but not actual records).

Total compliance (3 points): There should be documented procedures that are communicated to food handlers, requiring them to report any cuts, grazes and/or any illnesses that might be a food safety cross contamination risk. The procedures should indicate to whom the food handlers should report, how the issue is recorded and appropriate actions to be taken for a particular issue. Auditee records may be viewed as confidential and therefore a verbal confirmation should be gained.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of errors or omissions in procedure.

Major deficiency (1 point) if:

- Numerous instances of errors or omissions in the procedure.

Non-compliance (0 points) if:

- There is not a documented procedure in place.
- A procedure is in place but it has not been communicated to food handlers.

2.29.05: Are there written sickness reporting and return to work procedures?

Total compliance (3 points): There should be documented procedures that are communicated to food handlers, requiring them to report any cuts, grazes and/or any illnesses that might be a food safety cross contamination risk. The procedures should indicate to whom the food handlers should report, how the issue is recorded and appropriate actions to be taken for a particular issue. Auditee records may be viewed as confidential and therefore a verbal confirmation should be gained.

Minor deficiency (2 points) if:

- Single/isolated instance(s) of errors or omissions in procedure.

Major deficiency (1 point) if:

- Numerous instances of errors or omissions in the procedure.

Non-compliance (0 points) if:

- There is not a documented procedure in place.
- A procedure is in place but it has not been communicated to food handlers.

2.29.06: Is there a worker non-compliance/disciplinary action procedure (verbal confirmation accepted)?

Total compliance (3 points): The auditee should have a record for worker non-compliance and corrective actions detailed. Auditee records might be viewed as confidential and therefore a verbal confirmation should be gained. There might be a tier system, which includes verbal and written disciplinary actions. There might be immediate termination for gross misconduct.

Minor Deficiency (2 points) if:

- Option for minor down score exists but as present no known good examples exist.

Major Deficiency (1 point) if:

- Disciplinary system is not used for GMP violations.

Non-compliance (0 points)

- No records or no disciplinary system.

2.29.07: Are visitors and contractors required to sign a log stating that they will comply with the operations' personal hygiene and health policies?

Total compliance (3 points): All visitors and contractors should sign to say that they will abide by the company rules regarding personal hygiene/GMPs (e.g. hair nets, clothing/smocks, hand washing, jewelry, eating, drinking, smoking, etc.) and health requirements (i.e. they are free from diseases that might be a food safety cross contamination risk). The rules and policies should be clearly stated in relevant languages. This requirement may be included in the visitor sign in/out book.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of visitor(s) and contractor(s) not signing a log stating that they will comply with the operations' personal hygiene and health policies.

Major deficiency (1 point) if:

- Numerous instances of visitors and contractors not signing a log stating that they will comply with the operations' personal hygiene and health policies.
- Policy is not in the relevant language(s) of the visitors/contractors.

Non-compliance (0 points) if:

- The company does not have a log for visitors and contractors to sign stating that they will comply with the operations' personal hygiene and health policies.
- Systematic failure of visitors and contractors to sign a log stating that they will comply with the operations' personal hygiene and health policies.

Testing/Analyses Records

2.30.01: Are there records of routine equipment microbiological testing?

Total compliance (5 points): There should be records of routine equipment microbiological swab testing, for production and storage facilities that either have a washing step or involves high humidity storage. This testing should be designed to assess the (food contact/non-food contact) equipment sanitation

process. Production facilities that require swab testing will most likely be producing (or storing in the case of coolers) items that are consumed in a raw state (uncooked, potentially ready-to-eat) and with edible (e.g. peaches, apples, citrus, etc.) or inedible (e.g. melons, papaya, mango, avocados, etc.) peel or rinds. While the peel or rind is not eaten in some products, the method of handling and/or preparation poses a risk that requires these items to be considered as “potentially ready-to-eat”. This question is generally not applicable for products that require cooking i.e. potatoes and/or outer layer of commodity is not used as a food item in any way e.g. storage onions, garlic, etc.; although testing in any operation is based on risk assessment. If there is any doubt whether a product is consumed raw i.e. not cooked (e.g. cranberries, Brussels sprouts, asparagus, in-shell nuts, etc.), then it is assumed that raw consumption does occur and swabbing is applicable. Testing frequency, when, where and what to test for should be related to the risk assessment of the production involved. As a minimum guide, a fresh-cut facility should be carrying out weekly swabbing, whereas low risk products e.g. apples, citrus should be swabbing at least monthly. Choosing where to swab, should be done by assessing the main pieces of equipment that might need swabbing, based on risk and ease of ability to clean. If out of specification results are detected, then full details of corrective actions should be noted. Cooling operations should include ice injectors, vacuum tubes (both wet (hydro) and dry)) in the microbial testing rotation. Auditor should note the type of tests being carried out, frequency of testing, laboratory name, results status and where relevant confirmation of corrective action records. See the applicability chart.

Potentially useful website:
<http://www.icmsf.org/>

Minor deficiency (3 points) if:

- Single/isolated instance(s) of equipment being missed off the swabbing schedule, incorrect frequency.

Major deficiency (1 point) if:

- Numerous instances of equipment being missed off the swabbing schedule, incorrect frequency.
- Testing is sporadic and not on a scheduled basis.

Non-compliance (0 points) if:

- Out of specification results recorded (e.g. high counts, positive results for pathogens) but corrective actions not properly documented.
- There are no records of equipment microbiological testing.

2.30.02: Are there records of routine environmental microbiological testing?

Total compliance (5 points): There should be records of routine facility environmental swab testing, for production and storage facilities that either have a washing step or involves high humidity storage. This swab testing should be designed to assess the facility sanitation process. Generally, produce operations use environmental testing in the production and storage areas for *Listeria* spp. as an indicator to detect potential harborage of the pathogenic species *Listeria monocytogenes*. Other pathogens to consider include *Salmonella* spp., pathogenic *E. coli*, *Clostridium*, *Campylobacter*, *B.cereus*.

Production facilities that require testing will most likely be producing (or storing in the case of coolers) items that are consumed in a raw state (uncooked, potentially ready-to-eat) and with edible (e.g. peaches, apples, citrus, etc.) or inedible (e.g. melons, papaya, mango, avocados, etc.) peel or rinds. While the peel or rind is not eaten in some products, the method of handling and/or preparation poses a risk that requires these items to be considered as “potentially ready-to-eat”. This question is generally not applicable for products that require cooking i.e. potatoes and/or outer layer of commodity is not used as a food item in any way e.g. storage onions, garlic, etc.; although testing in any operation is based on risk assessment. If there is any doubt whether a product is consumed raw i.e. not cooked (e.g. cranberries, Brussels sprouts, asparagus, in-shell nuts, etc.), then it is assumed that raw consumption does occur and swabbing is applicable. Testing frequency, when, where and what to test for should be related to the risk assessment of the production involved. As a minimum guide, a fresh-cut facility should be carrying out

weekly swabs, whereas low risk products e.g. apples, citrus should be swabbing at least monthly. Choosing where to swab, should be done by assessing the areas that might need swabbing, based on risk issues observed e.g. drainage, condensation issues etc. If out of specification results are detected, then full details of corrective actions should be noted. Auditor should note the type of tests being carried out, frequency of testing, laboratory name, results status and where relevant confirmation of corrective action records. See the applicability chart.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of environmental testing not occurring at the right frequency.

Major deficiency (1 point) if:

- Numerous instances of environmental testing not occurring at the right frequency or testing is sporadic and not on a scheduled basis.

Non-compliance (0 points) if:

- Out of specification results recorded (e.g. high counts, positive results for pathogens) but corrective actions not properly documented
- There are no records of environmental testing.

2.30.03: Are there routine microbiological tests on water used in the facility (sampled from within the facility)?

Total compliance (10 points): There should be microbiological tests on water used in the facility on a routine basis to assure it meets the microbiological requirements of potable water. Testing frequency should be related to the risk assessment of the production.

- Processors of ready-to-eat products (e.g., baby leaf spinach, sliced apples, etc.) should test at least monthly.
- Facilities that have water coming into contact with product (excluding products to be cooked (e.g., potatoes)) i.e. wash steps, hydrocooling, etc. should test at least quarterly.
- Otherwise, minimum frequency is at least every 12 months.

If there is any doubt whether a product is consumer raw i.e. not cooked (e.g. cranberries, Brussels sprouts, asparagus, in-shell nuts, etc.), then it is assumed that raw consumption does occur and testing frequency is applicable. Water samples should be taken from the within the facility to account for the sites piping, holding tanks, etc. City water samples <http://www.epa.gov/safewater/dwinfo/index.html> are still good information to have, but if there is no site sample, then this question should be scored major. Results of water testing for total coliforms and/or *E. coli* should meet the US EPA drinking water **microbiological** specification <http://www.epa.gov/safewater/mcl.html#mcls>. If out of specification results are detected, then full details of corrective actions should be noted.

Where industry schemes e.g. Leafy Greens Marketing Agreement (LGMA) or specific legislative requirements are higher than audit requirements, the higher requirements should be followed and will be scored against. For example, LGMA rules require one sample per water source, collected and tested for generic *E. coli* prior to use if >60 days since last test of the water source. Additional samples should be collected and tested at least monthly during use. Refer to <http://www.caleafygreens.ca.gov/> for additional information.

http://www.access.gpo.gov/nara/cfr/waisidx_02/40cfr141_02.html

<http://www.epa.gov/ogwdw/mdbp/dbpfr.pdf>

<http://www.gpo.gov/fdsys/pkg/CFR-2011-title40-vol23/pdf/CFR-2011-title40-vol23-part141.pdf>

Minor deficiency (7 points) if:

- Single instance of water testing not occurring at the right frequency.

Major deficiency (3 points) if:

- Only water testing records available are from the City Water Board.
- More than one instance of water testing not occurring at the right frequency.

Non-compliance (0 points) if:

- No microbiological test results are available.
- Last test was done over 12 months ago.
- **A single out of specification microbiological test result without proper corrective actions, the auditor should consider production adulteration potential see 2.18.05, automatic failure due to product contamination.**

2.30.04: Are there routine microbiological tests on ice used in the facility (either produced in-house or purchased)?

- Total compliance (5 points): There should be routine microbiological tests on ice used in the facility. Testing frequency should be related to the risk assessment of the production.
- Processors of ready-to-eat products (e.g., baby leaf spinach, sliced apples, etc.) should test at least monthly.
- Facilities that have water coming into contact with product (excluding products to be cooked (e.g., potatoes)) i.e. wash steps, hydrocooling, etc. should test at least quarterly.
- Otherwise, minimum frequency is at least every 12 months.

If there is any doubt whether a product is consumer raw i.e. not cooked (e.g. cranberries, Brussels sprouts, asparagus, in-shell nuts, etc.), then it is assumed that raw consumption does occur and testing frequency is applicable. Ice samples should be taken from actual ice used to account for the sites piping, holding tanks, ice making equipment and ice storage, etc. Results of ice testing for total coliforms and/or *E.coli* should meet the US EPA drinking water **microbiological** specification <http://www.epa.gov/safewater/mcl.html#mcls>. If out of specification results are detected, then full details of corrective actions should be noted.

If an auditee is procuring ice from an outside vendor, the above requirements are still valid and the auditee should obtain testing results in order to gain full credit for this question, although some points will be awarded for letters of guarantee.

Where industry schemes e.g. Leafy Green Marketing Agreement (LGMA) or specific legislative requirements are higher than the audit requirements, these industry scheme and legal requirements should be followed and will be scored against.

Minor deficiency (3 points):

- Single instance of ice testing not occurring at the right frequency.

Major deficiency (1 point):

- Only water testing records available are from the City Water Board.
- More than one instance of water testing not occurring at the right frequency.
- Only a current (dated within last 12 months) letter of guarantee (for externally supplied ice) is available.

Non-compliance (0 points):

- No microbiological test results are available.
- Last test was done over 12 months ago.
- Ice is used from an outside source but there is no current (dated within last 12 months) letter of guarantee (and no ice micro test).
- **A single out of specification microbiological test result without proper corrective actions, the auditor should consider production adulteration potential see 2.18.05, automatic failure due to product contamination.**

2.30.05: Are routine tests (e.g., microbiological, moisture, etc.) performed on compressed air that is used directly on food and food contact surfaces?

Total Compliance 5 points: Compressed air used in direct contact with product, product food contact areas and the interior surface of packaging should be free of contaminants. Often compressors employ high efficiency filters with a very small mesh size to protect against contamination (which should be part of the equipment preventative maintenance, see 2.28.01) as close to point of use as possible. There should be routine microbiological tests on air used in the facility. Testing frequency should be related to the risk assessment of the production, but at a minimum testing should be a minimum frequency of once every 12 months. Testing may include microbiological (e.g., indicator organisms) and moisture content if there is risk to the product, dry operations using compressed air.

Potentially useful websites:

<http://www.foodsafetymagazine.com/magazine-archive1/octobernovember-2014/food-safety-insider-rapid-micro-solutions/compressed-air-an-overlooked-source-of-contamination-in-the-food-industry/>
<http://www.airbestpractices.com/standards/food-grade-air>
<http://www.airbestpractices.com/industries/food/three-types-food-industry-compressed-air-systems>
http://www.iso.org/iso/catalogue_detail.htm?csnumber=31385

Minor Deficiency (3 points) if:

- The risk assessment is incomplete (e.g., it is not clear how the frequency was determined, one method was left out of the risk assessment, etc.)

Major Deficiency (1 points)

- No risk assessment has been performed to verify the testing frequency, when there are microbiological test records available.

Non-compliance (0 points)

- No records.
- Microbiological testing has not been performed within the past 12 months.

Temperature Controlled Storage & Distribution Logs

2.31.01: Are there records of final product temperature checks for temperature sensitive product?

Total compliance (10 points): There should be records which show actual product final temperatures after processing and/or prior to dispatch for temperature sensitive goods (air temperature recordings are not acceptable for this question – see 2.31.03). Records should show that product is not shipped above temperature requirements (in-house specifications, buyer specifications, best practice requirements or legal requirements).

Minor Deficiency (7 points) if:

- Single/isolated instance(s) of omissions or incorrect data in the records.

Major Deficiency (3 points)

- Numerous instances of omissions or incorrect data in the records.

Non-compliance (0 points)

- No records.
- Failure to maintain records.

2.31.02: Are there temperature logs for the packing room (if refrigerated)?

Total compliance (5 points): There should be temperature logs or recording thermometer printouts on file. Not applicable if packing/processing room is not refrigerated. The issue of using an independent probe, separate from the thermostat probes and systems is covered under 2.21.04.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of errors or incomplete records, including corrective actions.

Major deficiency (1 point) if:

- Numerous instances of errors or incomplete records, including corrective actions.

Non-compliance (0 points) if:

- No temperature logs are on file (and the processing room is refrigerated).

2.31.03: Are there temperature logs for storage rooms?

Total compliance (5 points): There should be temperature logs or recording thermometer printouts on file. Holding temperatures in refrigerated storage rooms should not exceed 41 °F (5 °C) for microbiologically sensitive raw materials, ingredients or products e.g. raw seed sprouts, cut tomatoes, cut melons, leafy greens*. Not applicable if products are held at controlled high ambient temperature e.g. whole tomatoes, bananas, etc. The issue of using an independent probe, separate from the thermostat probes and systems is covered under 2.21.04.

* leafy greens whose leaves have been cut, shredded, sliced, chopped, or torn includes iceberg lettuce, romaine lettuce, leaf lettuce, butter lettuce, baby leaf lettuce (i.e., immature lettuce or leafy greens), escarole, endive, spring mix, spinach, cabbage, kale, arugula and chard; does not include herbs such as cilantro or parsley. Lettuce and other leafy greens cut from their root in the field with no other processing are considered raw agricultural commodities and are not included in the definition of “cut leafy greens” and are therefore not considered a potentially hazardous food requiring time/temperature control for safety (PHF/TCS) food, as defined and applied in the 2013 Food Code.

<http://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/UCM374510.pdf>

Minor deficiency (3 points) if:

- Single/isolated instance(s) of errors or incomplete records, including corrective actions.
- Single/isolated instance(s) of temperatures exceeding 41 °F (5 °C) for microbiologically sensitive raw materials, ingredients or products.

Major deficiency (1 point) if:

- Numerous instances of errors or incomplete records, including corrective actions.
- Numerous instances of temperatures exceeding 41 °F (5 °C) for microbiologically sensitive raw materials, ingredients or products.

Non-compliance (0 points) if:

- No temperature logs are on file (and the storage room is refrigerated).
- Records show temperatures systematically exceed 41 °F (5 °C) for microbiologically sensitive raw materials, ingredients or products.

2.31.04: Are there records of shipping truck temperature checks, indicating that the truck was pre-cooled prior to loading?

Total compliance (5 points): Refrigerated items should not be loaded on trucks which have not been pre-cooled prior to loading. The temperature of the truck refrigeration unit set point should be recorded to indicate truck was cooled to the appropriate temperature prior to loading. To confirm truck has been cooled and refrigeration unit has not malfunctioned there should be a check of internal truck insulation

e.g. an infrared surface probe or “touch-test” to confirm truck has been cooled. Corrective actions should be recorded when out of specification results are noted. Not applicable if products are not low temperature controlled in transit e.g. onions. Temperature and time loggers are encouraged, especially for long haul trips, but should form part of any down score, since the decision to use temperature time loggers are often made by the buyer(s) as opposed to the auditees at present.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of error, incomplete or missing records (including missing corrective actions).
- Single/isolated instance(s) of out of specification temperatures without corrective actions noted.

Major deficiency (1 point) if:

- Numerous instances of errors, incomplete or missing records (including missing corrective actions).
- Numerous instances of out of specification temperatures without corrective actions noted.

Non-compliance (0 points) if:

- No temperature logs are on file.
- Systematic failure to record truck temperatures.

2.31.05: Are there sanitary condition logs for shipping trucks (cleanliness, trailer condition, odor, etc.)?

Total compliance (10 points): There should be sanitary condition logs for shipping trucks detailing cleanliness and/or any off-odors. Corrective actions should be detailed. This may be indicated on bill of lading. Truck cleaning certificates are acceptable for the sanitation section of the question but these should be for each load for brokered trucks and on a regularly frequency for in-house trucks. Even with certificates, the trucks should be checked for cleanliness.

Minor deficiency (7 points) if:

- Single/isolated instance(s) of errors, incomplete or missing logs.
- Single/isolated instance(s) of an issue noted without corrective actions detailed.

Major deficiency (3 points) if:

- Numerous instances of errors, incomplete missing logs
- Numerous instances of issues noted without corrective actions detailed.

Non-compliance (0 points) if:

- No sanitary condition logs are on file
- Systematic evidence failure to record sanitary condition of trucks.

Allergen Control

2.32.01: There are no allergen risks handled or stored within production and storage areas?

Total conformance (0 points): If the production process includes the handling of allergen containing materials, then the allergen questions below should be completed. The key concerning allergens (a.k.a. major 8) in the U.S. are Wheat, Eggs, Milk, Soybeans, Crustaceans (Shellfish), Peanuts, Tree Nuts and Fish. Auditors and auditees should review legislation to see if the country of production or countries being exported to have different allergen listings e.g. mustard, celery and sesame. Other sensitive ingredients that would need investigating further are Sulfites and Artificial Color FDC No. 5. If there is no allergen handling on site then mark this question “Yes”, state an explanation and the rest of the allergen questions should be marked N/A (with a statement referring back to this question e.g. N/A, see question 2.32.01). This question is not designed to cover allergen containing items found in break room vending machines, personal break food stuffs etc., but ideally auditees should make their workers aware of the potential issues, especially when carrying out hand washing training.

Potentially useful websites:-

<http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/default.htm>

<http://www.foodallergy.org/home>

Minor deficiency (There is no minor deficiency for this question).

Major deficiency (There is no major deficiency for this question).

Non-compliance (0 points) if:

- Allergens are handled or stored within production and/or storage areas.

2.32.02: Has a documented allergen management plan been developed?

Total conformance (5 points): An allergen management plan has been developed and documented. The plan gives an overview of the operation's management of control from raw material procurement, goods receiving, raw material storage, production, finished goods storage through to shipping. The plan should cover areas, such as how raw material supplier allergen risks are evaluated/mitigated, on-site labeling, sanitation, labeling, etc. Some facets of the allergen plan are audited in the rest of the questions in this section.

Minor deficiency (3 Points) if:

- Policy lacks a key element.
- Single/isolated instance(s) of errors or omissions in the plan.

Major deficiency (1 point) if:

- Plan lacks more than one key element.
- Numerous instances of errors or omissions in the plan.
- Failure to communicate the plan to workers.

Non-compliance (0 points) if:

- No plan exists.

2.32.03: Are there adequate storage controls (separation, identification etc.) that ensure that allergens are not contaminating other raw materials?

Total conformance (5 points): Allergen materials and allergen containing materials should be stored in a manner that avoids cross contaminating all other materials. Allergenic ingredients and products should be physically separated from other materials, separate storage areas are ideal and allergens should never be stored above other materials. Where segregated storage is not possible, store like-allergens (e.g. milk and whey) together. Allergens should be tagged as usual (rotation and lot coding), but also should be identified as allergens e.g. tagged or color-coded.

Minor deficiency (3 points) if:

- Single instance of improper allergen storage or handling practices.
- Single instance of allergenic items not labeled as allergens.

Major deficiency (1 point) if:

- Isolated instances (no more than three) of improper allergen storing or handling practices or where there is not adequate physical separation and demarcation within the room.
- More than one but less than three instances of allergens not labeled as such.

Non-compliance (0 points) if:

- Allergens being stored together with other items in a way that poses a cross contamination risk.
- Numerous instances of improper allergen storing or handling practices or where there is not adequate physical separation and demarcation within the room.

2.32.04: Is there a dedicated production line or adequate clean down and production procedures that prevent allergen cross contamination?

Total conformance (5 points): Ideally facilities have dedicated equipment and production line(s) for allergen containing ingredients. If no separate production line is being used then procedures should be written that avoid allergen cross contamination e.g. schedule production of non-allergenic items before items with allergens, add allergenic ingredients as late in the process as possible, schedule sanitation immediately after production of foods containing allergens. Some allergen testing kits (where available for the particular allergen) are also used in order to check the sanitation after an allergen has been used in a product.

Allergens should not come into contact with non-allergenic products, especially processed products that have been washed, cut or thermally treated. There should be plenty of space and separation to help avoid cross contamination issues. Workers who handle allergen products should not then handle non-allergen products without first ensuring that they are free of allergen contaminants. This should include hand washing, glove change etc., but might also include changing into a new set of garments; ideally workers should be dedicated to allergen or non-allergen goods, but not both within a shift. Utensils, cleaning implements, internal vehicles etc. should not be allowed to be vectors for cross contamination; ideally dedicated coded equipment and storage areas should be provided for allergen and non-allergen goods. Where dedicated utensils and equipment are not possible, items must be cleaned prior to use for non-allergenic materials.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of worker/utensil/internal vehicle allergen cross contamination.
- Minor process issues where allergenic materials come into the same area as non-allergenic materials, but the two products do not touch in any way, i.e. no potential risk of cross contamination.
- Some potential space issues where the process flow is being forced to bring allergenic and non-allergenic material into close proximity.

Major deficiency (1 point) if:

- Numerous instances of worker/utensil allergen cross contamination.
- Serious process flow issues where allergenic material can potentially cross contaminate non-allergenic goods.
- Numerous space issues where the process flow is being forced to bring allergenic and non-allergenic material into close proximity.

Non-compliance (0 points) if:

- Systematic instances/issues with worker and/or utensil allergen cross contamination.
- Process flow issues are observed to result in allergen/non-allergenic goods cross contamination

2.32.05: Are utensils and work in progress storage containers identified in order to prevent allergen cross contamination?

Total conformance (5 points): Utensils, like shovels, paddles, knives etc. should be coded in order to differentiate between items associated with producing allergen containing products and products that do not contain allergens. Where dedicated utensils and equipment are not possible, items must be cleaned prior to use for non-allergenic materials. Sanitation equipment e.g. cleaning pads, mops, brushes etc., should also be coded and separated, between equipment destined to be used on allergen containing products/processes and non-allergen containing products/processes. Product holding bins should be

coded in a similar fashion i.e. a separate set of bins for the allergen containing product, this includes rework bins.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of utensils or work in progress storage containers not identified (tagged or color-coded) to differentiate between items associated with producing allergen containing products and products that do not contain allergens

Major deficiency (1 point) if:

- Numerous instances of utensils or work in progress storage containers not identified (tagged or color-coded) differentiate between items associated with producing allergen containing products and products that do not contain allergens.
- Items are commingled with other goods in such a way that their status is unclear and a potential misuse might occur.

Non-compliance (0 points) if:

- Utensils or work in progress storage containers are not clearly separated and identified.

2.32.06: Does re-work handling take into account the issues associated with allergen containing products?

Total conformance (5 points): Rework of allergen containing products needs to be strictly controlled. Allergen rework product should be clearly labeled. Allergen rework should be stored separately to non-allergen rework, raw materials and product. Allergen rework should only be used when a similar allergen containing product is being packed/processed. Even the outside of allergen containing condiment packs might be a risk to the foodstuff e.g. romaine lettuce, that a condiment pack was touching and therefore this foodstuff e.g. romaine lettuce should only be re-used for the allergen containing product. Like all rework, the traceability should be maintained which means that the use of rework materials is being properly recorded.

Not applicable if there is no re-work/re-packing taking place.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of an issue with re-work handling.

Major deficiency (1 point) if:

- Numerous instances of issues with re-work handling.

Non-compliance (0 points) if:

- Systematic issues observed in handling how re-work is done.

2.32.07: Are workers trained with respect to allergen risks and the facility allergen cross contamination controls (including hand washing between production runs) and are there records of this allergen training?

Total conformance (5 points): Workers should be aware of what allergens are the effects of allergens on allergy sufferers, the actual allergens handled on site and the facility controls to prevent allergen cross contamination. Training should include personnel practices, like hand washing, changing protective garments and gloves etc., when moving around the production area. Key operators like warehouse personnel, production personnel, label designers etc. should receive specific training. Training should be ongoing and recorded for both new and existing workers.

Minor Deficiency (3 points) if:

- Single/isolated instance(s) of errors and omissions in the records.
- Training materials are not in the relevant language(s).

- Training occurring but relevant materials are not being given to the trainee after the training.
- Training occurring, not before starting to work but within the first week.
- Single/isolated instance(s) of workers not being trained.

Major Deficiency (1 point) if:

- Numerous instances of errors and omissions in the records.
- Training occurring, not before starting to work but within the first month.
- Numerous instances of workers not being trained.

Non-compliance (0 points) if:

- No records that workers are being trained regarding allergens.
- No specific allergen orientation training given or given after the worker has been working for more than one month.
- Failure to maintain records.

2.32.08: Are all products manufactured on site, labeled correctly with respect to allergens?

Total conformance (5 points): Allergen containing products should clearly show on the label the allergens that are associated with the product. If the allergens form part of condiment inclusion packs, these allergens should still be indicated on the main product label. If an operation is producing allergen containing products that will be used as an ingredient by a subsequent manufacturer, the documentation that goes with the product should underline the allergen contents and also ideally the bag and cartons should indicate the allergen contained within the product. If non-allergen containing products are produced on a site where allergens are used, the management should consider the chance of allergen cross contamination and if satisfactory controls to prevent such contamination are in place. If there are any doubts about the adequacy of these controls (GMPs), etc., then the management should have considered using a “may contain” (or a similar clause) on the non-allergy containing products (this is a last resort and should not replace proper GMPs). Labeling should follow the national and local labeling laws.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of missing allergen information on commodities, packaging, ingredients, processing aids, work in progress, etc.

Major deficiency (1 point) if:

- Numerous instances of missing allergen information on commodities, packaging, ingredients, processing aids, work in progress, etc.

Non-compliance (0 points) if:

- There is no allergen information on commodities, packaging, ingredients, processing aids, work in progress, etc.

Potentially useful website:-

<http://www.fda.gov/Food/IngredientsPackagingLabeling/FoodAllergens/default.htm>

Module 2 (GMP) Audit Applicability Chart

This chart is intended for guidance only. Situations will vary depending on process, product and intended use.

	Audit/Product	Environmental Micro	Equip Micro	Hairnets/ Hair Restraints	Smocks	Hand Dips/ Gel stations	Foot Dips	Example Products
1	Processing Audit (ready-to-eat)	Y	Y	Y	Y	Y	Y	Fresh-cut salad, sliced fruit, sprouts, sliced mushrooms, juice, frozen blueberries
2	Packinghouse Audit (potentially ready-to-eat)	Y	Y	Y	Y ¹	Y	N	Whole: tomatoes, apples, citrus, avocado, melon, cranberries, asparagus, herbs
3	Packinghouse Audit (requires cooking)	N	N	Y	N	N	N	Washed whole potatoes
4	Packinghouse Audit (unwashed &/or outer layer ² not an integral part of product)	N	N	Y	N	N	N	Whole onions, whole garlic
5	Cooling/Cold Storage Audit (with hydrocoolers, hydrovacs, ice injection)	Y	Y	Y	N	N	N	Field-packed broccoli
6	Storage & Distribution Audit	Y	N	N	N	N	N	

Note

¹ In packinghouses that wash product, smocks or aprons are a "must" after the wash step but ideally throughout the operation.

² Outer layer i.e. skin is not eaten or used as an integral part of the product e.g. storage onions, whole garlic.

Y Applicable, do not use N/A

N Generally N/A. If operation has implemented then MUST be scored.