

QUESTIONS AND ANSWERS REGARDING SANITATION SOPs

Q1. If the SSOP monitoring frequency is daily, and a plant does not operate on a particular day, is it recordkeeping noncompliance if records are not generated for that day?

A1 No. 9 CFR 416.16(a) requires that an establishment have daily records to document the implementation and monitoring of its Sanitation SOP. However, 9 CFR 416.12(a) states that the SOPs are to describe "...all procedures that an official establishment will conduct daily, before and during operations...." Thus, there is no documentation requirement for days or times when it is not operating.

Q2. Is an icehouse considered a food contact surface that must be addressed in the SSOP?

A2. A food contact surface is any surface that may come in direct contact with exposed product. Examples of food contact surfaces include conveyor belts, table tops, saw blades, augers, and stuffers. If the interior surfaces of an ice house do not directly contact product, the establishment would not be required to address them in the SSOP. Regardless, FSIS verifies SPS regulatory compliance. FSIS expects the establishment will prevent the creation of insanitary conditions within the icehouse that could result in product contamination with filth or that may render the product injurious to health.

Q3. Must an establishment document that it has re-evaluated and maintained its SSOP in accordance with 9 CFR 416.14?

A3. No, there is no regulatory requirement that establishments document the re-evaluation of the effectiveness of the SSOP. However, the establishment is required to revise the SSOP and the procedures therein as necessary to keep them effective and current.

Q4. Can "as needed" be used as a frequency for an SSOP procedure?

A4. Under 9 CFR 416.12(d), establishments are to specify the frequency with which each procedure in the SSOP is to be conducted. Therefore, establishments need to select a minimum frequency (e.g., daily, every 4 hours), in conjunction with "as needed." For example, the SSOP may state, "on an as needed basis, but no less than once every three days." The CSI will verify that the establishment maintains sanitary conditions. The Agency will not question the frequency that the establishment specifies unless there is evidence that the frequency is not sufficient to prevent the creation of insanitary conditions.

Q5. If a plant includes wall surfaces in its SSOP, does SSOP noncompliance exist if product is found by FSIS inspection program personnel on the walls when performing 01B02, preoperational sanitation?

A5. The CSI needs to consider whether the establishment's failure to implement its SSOP for cleaning the wall resulted in an insanitary condition whereby product may become contaminated or may be rendered injurious to health. If so, then 01B02/SSOP noncompliance exists, under 9 CFR 416.13(a) and (b).