

Commonly Asked Questions from Small and Very Small Plants on Sanitation Performance Standards (2)

Q1: Are inspection program personnel required to follow plant employee hygiene standards documented in prerequisite programs, as good manufacturing practices, or any other written program not associated with the Sanitation SOP?

A1: Yes, Agency expectations are that inspection program personnel follow the specified employee hygiene practices established by the establishment. If there are other programs not associated with the written Sanitation SOP, inspection program employees are expected to follow these practices. For example, if the establishment has a procedure that requires beard nets for all employees with facial hair, FSIS program employees must also follow this procedure. If FSIS program employees have questions concerning any employee hygiene practices they would need to follow, they should contact their immediate supervisor.

Q2: Do my hand wash sinks have to have foot-operated on/off pedals and a paper towel dispenser?

A2: No. The regulation 9 CFR 416.2(h)(2) requires that hand wash sinks:

- Have running hot and cold water, soap, and towels (or other means of drying hands)
- Be placed in or near toilet and urinal rooms, and
- Be placed at any other places in the establishment necessary to ensure cleanliness of all persons handling any product.

The regulation is not prescriptive; however, inspection program personnel will verify that the use of hand wash sinks does not result in an insanitary condition or lead to contamination or adulteration of product.

Q3: Are establishments required to clean the facility at mid-shift or between shifts?

A3: No. There is no prescriptive regulatory requirement for establishments to clean their facilities at mid-shift or between shifts. However, if the establishment has mid-shift or between shift clean-up identified as a Sanitation SOP procedure the establishment must follow their written procedures. Inspection program personnel will verify the establishment is meeting the sanitation requirements in 9 CFR Part 416.

Q4: Are there any specific procedures that must be used to protect product during storage and shipment?

A4: No. Product should be protected from adulteration during processing, handling, storage, loading, and unloading at and during transportation by the official establishment. The regulation in 9 CFR 416.4(d) is not prescriptive; thus the establishment decides what procedures it will follow to meet the performance standard.

Q5: Are meat and poultry products required to be stored separately from non-meat ingredients?

A5: No. Meat and poultry products and non-meat ingredients must be stored in a manner to prevent insanitary conditions and to prevent contamination and adulteration of product. As stated above in Question and Answer #4, 9 CFR 416.4(d) is not prescriptive; thus the establishment decides how non-meat ingredients can be stored to meet the performance standard.