General Sanitation SPS/SSOP-Review:

- SSOP Regulations 9 CFR 416.11-416.17
- SPS Regulations 9 CFR 416.1-416.6
- Sanitation SOP must contain:
  - Daily procedures conducted both before and during operations to prevent direct contamination of product, or product contact surfaces.
  - Establishment implementing and performing at the frequencies stated in the plan.
  - Corrective actions must be taken and documented when there is failure to prevent direct contamination of product or product contact surfaces. Remember DRIP
  - Disposition, Restore, Prevent
**General Sanitation SPS/SSOP-Review:**

- Establishment must document the monitoring of the SSOP & any corrective actions taken.
- Records made available to FSIS personnel upon request.
- Use FSIS Directive 5000.1 as guidance.
- Answer questions from the General Tool and any additional questions contained in specific tools (i.e., Sanitary Dressing/RTE Sanitation).
  - Review appropriate records
  - Make direct observations

**Performing the Assessment**

- The EIAO reviews and considers
  - Sanitation NRs
  - Salmonella Performance Standards results
  - Impact of SPS findings on food safety
  - Impact on the HACCP system
  - View entire operation
  - Determine if adequate level of sanitation is maintained to prevent product adulteration

- The EIAO will
  - Review SSOP design-assess the SSOP and its routine procedures are designed and implemented to prevent direct product contamination.
  - Analyze how the SSOP design and implementation impact the ability to support decisions in the Hazard Analysis and HACCP plan.
  - Observe SSOP implementation.
  - Randomly review 13 days of SSOP records from the last 60 production days.
  - Answer questions from tools.
Performing the Assessment

- The EIAO should analyze the information collected relating to sanitation requirements and document a supportable agency position.

General Tool – Dual Jurisdiction

- When establishments produce both FDA and FSIS regulated products, gather info about how establishments address production
- Directive 5730.1
- Assess how the food safety system prevents contamination of FSIS products from insanitary conditions in FDA areas, especially for RTE products

Other Information – Recalls

- Recalls:
  - 9 CFR 418.2-418.4
    - Establishment must notify FSIS within 24 hours if reason to believe adulterated product entered commerce
    - Establishment must maintain written procedures
    - Directive 5000.8 Verifying Compliance with Requirements for Written Recall Procedures
    - If EIAO determines noncompliance with 418-Work with Supervisor/FLS to get NR issued.
Methods Group Exercise I

- A cattle slaughter plant has had multiple instances of rail dust contamination on carcasses in the cooler for the last 2 months.
- What would your regulatory & statutory thought process be for taking a possible enforcement action?