FOOD SAFETY AND SANITATION

Self-Inspections and Internal Audits

Learning Objectives

- Describe the difference between inspections and audits
- Conduct self-inspections
- Conduct audits
- Differentiate between pre-operational, post-operational, and monthly inspections
- Determine when an assessment is appropriate

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All food plant personnel are responsible for food safety in one way or another. Effective food safety programs highly regard inter-department relationships, as well as the relationships between managers and their employees. Consider each of the following potential scenarios where product integrity is in jeopardy. Each scenario is also a potential violation of Section 402 (a)(4) of the Federal Food, Drug, and Cosmetic Act (FD&C Act).

- A maintenance employee accidentally drops lubricating grease onto a food-contact surface and fails to wipe it completely clean.
- A production employee fails to promptly return thawed whole eggs to suitable refrigeration.
- A sanitation employee inadvertently spills a powdered cleaning agent into an open ingredient container.
- A sales employee accumulates moldy products in a route truck.
- A shipping employee negligently leaves an exterior door open, jeopardizing the rodent control program.

In each scenario, the employee's actions put supervisory personnel in jeopardy of violating federal law and threaten the jobs of every other employee in the plant. Each of these scenarios must be evaluated and corrective actions must be assigned. A chain of responsibility that describes how all employees, including supervisors, are key figures in protecting food products should be established.

A team management approach should be used to define food safety programs. A formal food safety committee should be in place at all food facilities to plan and establish the food safety program, to fully inspect the operation and audit all food safety programs for deficiencies, and to eliminate any deficiencies.

Inspections and Audits

It is important to understand how self-inspections and internal audits are linked. Inspections are a physical evaluation of a moment in time used to identify positive or negative conditions and determine if programs are effective and being followed. An

inspection should evaluate the physical condition of the facility and equipment and observe personnel practices to collect information in order to determine compliance with the facility's food safety programs. The inspection will often initiate immediate corrective action.

Internal audits are a systematic evaluation of programs to determine if programs and related activities achieve planned expectations. They should review and challenge the written program's documentation of activities. Audits help to correlate how documented procedures and activities are being executed in the facility. They can help identify root cause and long-term corrective actions. Internal audits should be conducted once procedures are written and personnel are trained according to the procedure.

The main difference between the two activities is that audits focus on documentation and inspections focus on physical evaluation. Inspections and audits can be stand-alone activities, but should also be linked with each other. For example, specific findings during an inspection may lead to an evaluation of programs and systems or an audit.

During an inspection, you find heavy dust accumulation on an air vent in the production area, which leads to an audit of the related programs. You may wish to evaluate the master cleaning schedule to determine if the vent is included with an established cleaning frequency. If it is on the schedule, you would determine the last time it was cleaned and documented. If it is included on a monthly cleaning frequency and it has only been 14 days since it was last cleaned, you may decide to increase the frequency or further evaluate the cleaning program. The next step may be to evaluate the cleaning procedure to see if an effective procedure has been identified.

Inspections and audits should be interconnected. If the inspection only creates a list of findings and does not audit the programs, adjustments or corrections will not be made to prevent the findings from reoccurring.

ICE

The ICE principle is a problem solving strategy that uses root cause analysis and has a number of applications in a food plant.

I = Identify, introduce, intensify
C = Control
E = Eliminate

Let's look at how it can apply to self-inspections and internal audits.

I = *Identify, introduce, intensify*: During an inspection or audit you recognize an issue. Examples of this may include:

- Identifying damaged door seals on overhead doors in the warehouse
- Finding flaking paint on the ceiling in the production area that could be introduced into products
- Discovering the temperature of the cooler is at 52°F which could intensify a microbiological issue

C = *Control*: This is the short-term, immediate correction of the issue.

- Replace the damaged door seals on the overhead doors
- Remove the flaking paint on the ceiling
- Adjust the temperature setting or repair the refrigeration unit for the cooler and evaluate the condition of the materials in the cooler to determine if they have been subjected to temperature abuse and if they are safe to use or should be discarded

E = *Eliminate*: Develop and implement reasonable and practical solutions, which effectively address underlying causes. This step may require the evaluation of many programs.

- Doors seals
  - o Evaluate the preventive maintenance program to determine if doors are on a periodic maintenance schedule
  - o Educate employees in the warehouse to monitor the condition of the door seals and to report them if they are damaged or missing.
- Flaking paint
  - o Develop a regular schedule to monitor and remove paint as it becomes loose

  - Evaluate the sanitary design standards and determine if paint is necessary to prevent corrosion or if it was simply painted for cosmetic purposes; this should lead to future decisions about when and why surfaces need to be painted or if they can be left unpainted to prevent future flaking paint
  - If ceilings must be painted, evaluate the type of paint used to ensure it will withstand the conditions of the environment
- Temperature
  - Evaluate the preventive maintenance program to determine if the refrigeration units are scheduled for regular maintenance
  - Determine if the temperatures are monitored on a regular basis and/or if alarms are in place to notify personnel of temperature issues

Positive or negative results from self-inspections and audits can be used to verify or validate programs. For example, self-inspections can be used to verify compliance with the GMP policies established by the company. If several issues related to personnel practices were identified during an inspection, this may indicate a concern with the policy itself, or inadequate employee training and education for these policies. On the flip side, if no personnel practices issues were identified during the inspection, the information could be used to verify and/or validate that the program is working.

Self-inspections and Internal Audits Committee

Inspections and audits can consume a considerable amount of time. Every facility should have a multi-disciplinary committee that includes representatives from various departments so that the inspection and audit activities are distributed across a team of individuals. It is important that the activities be organized and efficient to maximize the committee's time and to put the information gained to proper use.

If a self-inspection and internal audit program is being established for the firsttime,therewillbemany financial

and policy-related decisions to make. It is good to have the highest company official at the site participate on the committee. In addition, department leads or representatives (e.g., engineering, maintenance, sanitation, production, quality, warehousing/shipping/receiving, etc.) must be involved. One of these individuals should be selected as the committee chairman. One of the primary responsibilities of the chairman will be to ensure inspections and audits are carried out as scheduled and corrective actions are taken for those issues identified.

Ideally, additional employees (e.g., office manager, safety officer, human resources director, etc.) should also be involved. Hourly and office personnel are also excellent candidates. When the committee is diverse, each person will view the plant from a different perspective, allowing the committee to discover more defects and opportunities for improvement.

The committee chairman should establish the day and time that each inspection or audit will be made, but the area to be inspected should remain unknown until the committee is assembled in order to prevent individuals from prepping their areas for an inspection. All committee members should be present for the inspection or audit and held accountable if they are absent. These activities should be considered part of their job duties and frequent absences should be cause for a reprimand.

It is generally suggested that the committee act as a group, or if larger than ten, be split into two groups. In some cases, it may be beneficial to assign two or three committee members to conduct the inspection on a rotating basis. It is also suggested that the inspection be confined to items that impact food safety and not extended to additional areas, such as employee safety. Including other non-food safety items during these inspections may decrease the focus on food safety-related issues.

Method

The inspection or audit method used will vary according to the complexity of the plant and the available manpower. The method should provide a comprehensive review of the operation to eliminate product safety hazards. Depending on the size of the plant, one method of self-inspection is to divide the plant into relatively small areas and to check one of these areas each week. For example, on a four-week inspection cycle, the plant would

be divided into three areas. It is important that these areas include support areas (e.g., break rooms, restrooms, maintenance shops, chemical storage rooms, boiler rooms, etc.) as well as the outside grounds and roof. One area would be inspected each of the first three weeks and a committee meeting would replace the inspection activity on the fourth week. During this meeting, the inspection results from the previous three weeks should be evaluated to ensure corrective actions have been completed or scheduled. It may also be beneficial to look for trends that have been noted during the inspections and evaluate their root causes.

Separate internal audits may also be part of the committee's responsibilities. Some facilities establish a schedule for auditing their food safety programs, which may differ from the self-inspection schedule. It may be beneficial to identify all the facility's food safety programs and set a defined schedule for when these programs will be audited. For example, if the facility has identified 24 programs (e.g., chemical control, allergen control, cleaning and sanitation, etc.) that are essential to food safety, two programs could be audited each month so that all 24 are covered within one year. Another option is to audit the programs associated with the areas being evaluated as part of the self-inspection.

When food safety committees attempt to cover too large of an area or audit too many programs at once, failure can occur. If done properly, the time devoted to an inspection and/or audit can be quite short. When the area to be examined is specifically defined and committee members stick to assigned tasks, 30 to 60 minutes should be sufficient to adequately examine a specific area. The boundaries of the area to be inspected should be clearly defined and the specific programs to be evaluated during internal audits should be identified.

Inspection Goals

Inspections allow you to verify that your food safety policies and procedures are being properly followed. Additionally, the self-inspection program can be an extension of your training and education program. Employee performance can be improved by using inspection deficiencies to plan future training and education. Depending on the deficiencies observed, the training and education may need to be immediate or can be scheduled at a later date. Photos of deficiencies noted in the inspections can be beneficial for future employee training sessions.

The primary goal of a self-inspection is to review existing conditions. After finding deficiencies, the committee should categorize them in a list. One method of categorization can be modeled after the AIB Consolidated Standards for Inspection. Those categories are:

1. Operational Methods (OM) and Personnel Practices (PP)
2. Maintenance for Food Safety (M)
3. Cleaning Practices (CP)
4. Integrated Pest Management (IPM)

If desired, operational methods can be separated from personnel practices. Sometimes a defect will fall into two or more categories. For instance, the sighting of pests would be listed as an IPM issue, but the reason for the pest may be a CP, M, OM, or PP category. In those cases, the defect, as it is written, should be preceded by the category with a notation for the corrective action necessary.

Organizing defects by categories allows the committee to easily recognize critical situations when they begin to appear within a given category. If half of the items recorded are categorized as maintenance issues, there may be a program issue that needs to be reviewed with the maintenance department. Repeated issues in a single category should alert management that there is a problem with the food safety program and a more extensive audit of the program may be necessary.

If weaknesses exist, a good food safety committee will recognize them and solve food safety problems that are beyond the scope or the authority of the various supervisors or the individuals in charge of the food safety program.

Preparing for an Inspection

Those involved in self-inspections should be keen observers and able to recognize what is happening or should be happening in those areas. They should ask questions, explore, experiment, think, analyze, and draw conclusions about research data. Their experience should give them the ability to identify the vulnerable areas of a facility where issues may be likely to be.

Inspectors should begin an inspection with an open mind and not have preconceived notions of what they expect to find. They should interact with employees to assess their level of food safety knowledge and determine how well they understand their job responsibilities. Ask a few individuals open-ended questions (versus those that prompt a yes or no reply) during their job activities to gauge their level of understanding. The questions may start with prompts such as explain, why, describe, how, what, etc.

When an issue is identified, inspectors should continually ask "why" in order to determine the root-cause. Some issues may seem very simple on the surface, but further investigating may lead to other complex issues.

There are some basic tools that should be used during an inspection.

- Flashlight (15,000-20,000 lumens)
- Inspection mirror (polished metal, non-glass)
- Scraper/spatula
- Thermometer
- Basic hand tools for opening equipment (as allowed)
- Writing tablet and pen or hand-held computer
- Camera or other recording device
- Keys to secured areas and gates

Employees are very aware of the food safety committee during an inspection. If the team is in nice business clothes, employees assume there will not be much actual investigating around dust-coated equipment or in areas where splashing may occur. Committee members should wear clean, washable outer clothing. At some facilities, committee members wear a complete white uniform somehow identifiedasthefoodsafetyinspectionteam. Inspectors

should be prepared to get dirty while they are digging, climbing, and crawling during a physical inspection.

Committee members need to follow the same company personnel policies as production employees. If the facility has strict rules about uniforms, safety shoes, and other personal protection equipment, the inspection team should comply with these rules.

The committee should assemble on time at a selected site and determine at that time where the inspection will begin. In some cases, special equipment (e.g., man lifts and ladders) may be required to access overhead areas. It is better to have these items in place before the inspection begins rather than wait for their arrival.

Conducting an Inspection

Conduct self-inspections with food safety and employee safety in mind. It is never worth the risk to put yourself in an unsafe condition. If you are not familiar with an area or piece of equipment, find someone who is to advise you of what can be done. Conduct the inspection without jeopardizing the safety of the product. Examples include inspecting overheads near a product zone during production, using a scraper to dig into a floor crack and then using the same tool in an ingredient bin, and inspecting a floor drain and then touching a piece of equipment without washing your hands.

Special attention should be given to situations that present a product hazard. Regulatory enforcement agencies have shifted their attention almost entirely to the concept of complete product protection. If a condition exists that could allow paint, grease, condensate, rust, or similar contaminants to be introduced to the product or product zone, the situation is considered a violation.

Another example of a violation would be evidence of rodent activity in a food plant or warehouse since a rodent could contaminate ingredients, products, or product zones.

During an inspection, you may find unfavorable conditions. You may be tempted to repeatedly return to the same locations and look for the same conditions, but each area should be approached as though it has never before been inspected.

What to Look For

Inspections are not limited to production and storage areas. They should include the roof, exterior grounds, and every interior area (e.g., boiler rooms, maintenance rooms, and office areas). Problems can exist above and below eye level. Change your position regularly to observe areas from different perspectives. For example, checking the grounds from the roof may reveal areas that require further investigation.

During an inspection, you may find yourself looking too hard too find problems. If you suspect this is happening, step back and become an observer rather than an active player in the scene around you. Clear your mind and allow your eyes to take in the entire area. You can also divide the area into small manageable areas allowing you to process information more efficiently.

Roof Areas

Roof areas can impact the food safety program in many ways. Dust accumulation in air intake systems can support mold and bacteria growth or promote insect development. Pay particular attention to air intake systems to ensure filters fit properly and are well maintained. Standing water on the roof can promote microbial growth and may also attract birds and other pests. Employee practices can also lead to pest issues. For example, maintenance personnel may leave debris from a project on the roof, which can become a pest harborage. Do not overlook the possibility of rodents becoming established on the roof and going undetected. If rodent control devices are in place, inspect them along with the rest of the area.

While on the roof, observe the grounds. Look at what is going on around the property. Consider how your neighbors' activities could impact your operation. The roof may also be an excellent observation point for monitoring the receipt of materials. By observing from a distance you may get a true glimpse into which procedures are being followed.

Outside Grounds

The inspection of the outside grounds should involve the entire area, including the fence line, waste treatment facilities, and all outbuildings. Preparation is important since you will need keys to access outbuildings.

Look closely for conditions that could impact the facility. Rodent burrows are a sure sign of problems waiting to happen inside the facility. Standing water can attract pests to the plant. Unkempt areas with uncut grass or accumulations of old equipment should be a focal point of the inspection.

The integrity of the structure should be checked closely. Identify potential pest entry points, including pipe penetrations, door seals, utility line entry points, window screens, etc. Also verify that all bait stations and rodent traps are being properly maintained.

Interior areas

Consider the processes at your facility and where problems might occur. Identify conditions that support insect populations and locate the hotspots. Identify foreign material concerns that exist in the process and determine if corrective actions have been taken to prevent them. Become familiar with the procedures and policies for the areas you are going to inspect. The team must use all their combined knowledge to conduct a thorough investigation. Look for deficiencies in all categories. Personnel practices should be observed to make sure employees are complying with the GMPs.

The three-dimensional approach also applies to production and warehouse areas. Infestation issues and foreign material concerns can exist as easily in overhead areas as they can at floor level. During inspections of warehouse areas, bring pallets down from upper

levels or raise inspectors up on approved lifts. Identify structural deficiencies that can harbor pests or create microbiological concerns and investigate them closely. Floor drains and cracks in the floor should not be overlooked. Look for food debris accumulations since they provide an excellent area for scavenger or structural insects to congregate.

Equipment

Accessing equipment is an important aspect of the self-inspection program. Confirm that the cleaning and maintenance programs are controlling potential risks to the product. Inspecting equipment can be dangerous. Be sure to follow all company safety rules and procedures. Since some equipment needs to be disassembled for inspection, maintenance personnel need to play an active role on the inspection team.

Do not carry out all your inspections at the same time of day. Vary the inspection schedule since not all equipment is readily available for inspection at a given time. The inspection process may have to be conducted over the course of all three shifts which would require more personnel to participate.

Documenting Inspections and Audits

Many facilities develop checklists to help them during inspections. Initially, these checklists can be helpful and provide a guide of specific items to look for. However, over time the inspector may rely on the checklist so much that they neglect other areas. This can cause team members to miss serious issues. To prevent dependency on a checklist, it should only include generic items to consider (e.g., overheads, container identification, equipment storage, employee practices, protected lighting, etc.), but not specific items. Many companies choose to simply start with a blank inspection report and document items as they are discovered during the inspection or audit.

Details are important. Note items, such as missing electrical box covers and knockouts, that could directly impact pest control. Surplus lubricant and chipped paint over or in the vicinity of a product zone is a product hazard and should be noted. It is far better to have too many items on the list than to miss even one item that could be considered critical to product safety.

It is important to record each issue observed, as well as its location, because the items on the inspection list will eventually be assigned to someone for correction. Be specific enough for future understanding, but try to be brief. Some companies choose to take a picture of the issue so it can be evaluated at meetings or used to help the person responsible for the corrective action find the specific item.

At the conclusion of each week's inspection, the recorder should copy and distribute the inspection notes to each department lead. Immediate action can then be taken on the items that can easily be corrected.

Documentation of audits may not be as extensive as the inspections. It should include: the program being audited, identified observations, corrective actions, specific assignments, and actual accomplishments.

Corrective Action Plan

Department leads should be given a clear copy of the written inspection notes within a day after the inspection. Each department lead should make sure that the issues noted within the scope of his or her activities are corrected immediately. For example, the plant engineer is generally responsible for any lubrication malfunction, such as issues caused by poor work habits of the person doing the actual lubrication task or a lack of training or supervision.

If an equipment malfunction creates potential grease contamination, the remedy may involve a considerable expense or even cause

the facility to shut down. Depending on the seriousness of the condition, the food safety committee must decide the action to be taken. If the committee observes a serious condition or one is reported, immediate steps should be taken to protect the product. If product contamination has occurred or a high potential for contamination is likely, immediate steps must be taken to ensure that the contaminated products are not introduced into the market.

At the end of the inspection cycle when the entire facility has been inspected, the food safety committee should hold a meeting. The discussion at the meeting will be based upon the inspection notes which should have been distributed to all team members at least one week prior. Any notes regarding uncorrected items from previous inspections should be addressed first. The committee chairman should review the itemized list to determine if corrections have been made. If an issue has not been corrected, the department lead responsible for the condition should provide a realistic remedy date, and a status report should be given at each future meeting until the condition has been corrected.

Issues that continue to reappear in the inspection notes, even if they have been marked as corrected, should not be considered resolved. For example, it is a violation of the current Good Manufacturing Practices (GMPs) to have personal clothing lying about in a food production area. This includes sweaters, purses, and similar personal apparel. When a personal item appears in several inspection reports, it means that someone has been notified of the issue, but the correction has not been adequate. Repeated issues may point to a weakness in the training program or in the department supervision, or could be due to a lack of proper equipment. For example, providing a place to put clothing, even a specific peg on a specific post, and enforcing its use may correct the problem. The same would apply to continually finding uncovered ingredient bins, employees wearing soiled clothing, visitors wearing inadequate hair coverings, and other violations. In these examples, the actual issues observed are less important than determining why the violations exist and what should be done to prevent them from repeating.

Audit results or findings should be brought to the attention of the personnel responsible for the program involved. Deadlines must be established and corrective actions implemented. The corrective action may be complex and time consuming if the entire program needs to be refinedandpersonnelretrained.Whenretrainingis

necessary, the training should be different from the original training provided. If it is the same, it is not reasonable to expect a different result. The training program may need to be permanently modified.

Other Inspections

In addition to periodic/monthly self-inspections and internal audits, there are other very important inspections that may be necessary.

Pre-Operational Inspections (Pre-Op)

Pre-op inspections are conducted just before a production line or production area begins operation. The production lines or areas may have been down for scheduled maintenance, sanitation, weekend shutdown, changeover, etc.
The goal of a pre-op inspection is to ensure the product zones and equipment are in satisfactory condition to begin operation and limit the potential for immediate food safety issues. A product zone is the area where a product may touch a contact surface and extends directly up to the first point of protection, such as a cover or shield. If there is no cover or shield, the product zone extends to the ceiling. Pre-ops differ from detailed monthly self-inspections that also focus on the surroundings in a production area.

Pre-op inspections can be visual, typically follow a checklist, and are conducted by designated individuals (e.g., production supervisors, trained operators, or quality personnel). However, they can also use testing methods, such as adenosine tri-phosphate (ATP) or allergen swabs. ATP tests are more commonly used for pre-op inspections because the results can be obtained in a minute or less. Allergen tests typically take more time and are not as commonly used for a pre-op inspection. Swabbing equipment can identify issues that may not be seen with the naked eye.

During the pre-op inspection, the designated individual(s) will

work from a checklist and document any non-conformances. At the conclusion of the inspection, the inspector may give a pass or fail. If issues noted may cause product safety issues, the inspector would fail the inspection. Examples of inspection failure might include:

- Equipment not properly assembled
- Maintenance or sanitation tools left on equipment
- Improperly cleaned equipment with visible product residue
- Allergens remaining in a production area that will not be used during the scheduled production run
- Packaging or labels left in the area from a previous production run
- Excess grease or oil on bearings or gearboxes that may jeopardize products
- Missing or damaged covers on light fixtures above product zones or product areas
- Roof leaks above product zones or product areas
- Failed ATP test/swab

Any issues or non-conformances must be documented and corrected before production may begin. This will require immediate action by those responsible for correcting the situation. Some conditions identified may require further action, such as additional cleaning and sanitation of a piece of equipment if lubricants or allergen residue from a previous run were noted. Once the issues have been corrected, the corrective actions taken should be documented and that specific area or piece of equipment should have a final pre-op inspection conducted and documented to ensure it was corrected satisfactorily.

Post-Operational (Post-Op)

Post-op inspections are similar to pre-op inspections, but are conducted immediately after a production line or area is shut down or after maintenance tasks are completed on production equipment or within production areas. These are generally conducted before the production or maintenance personnel leave the area so any issues can be addressed by the appropriate person(s). Post-op inspections are typically visual inspections that can be conducted using a checklist. When post-op inspections are conducted, it is important that someone other than the person who conducted the initial tasks complete the post-op inspection.

Common items to check for after maintenance activities are completed may include:

- All tools and parts were removed
- Any maintenance debris created during the repairs were properly cleaned up or removed
- The equipment was properly repaired in a way that will not jeopardize product safety (e.g., no tack welds, improper repair materials, presence of oil or grease, etc.)
- Verify that sanitation has been notified to properly clean/sanitize the equipment

Common items to check for after a production shutdown may include:

- Tools and utensils were returned to their respective areas or sent to sanitation for cleaning
- Remaining ingredients, products, packaging, and/or labels were cleared from the line
- General housekeeping was performed to allow sanitation to focus on detailed cleaning
- Production records, such as batch records and metal detector records, were collected and filed in their respective areas

If any issues or non-conformances are identified, these must be documented and corrected. Personnel responsible for the issues or non-conformances should correct them before they leave. Once the issues have been corrected, the corrective action should be documented.

Assessments

Assessments are used to evaluate a program to ensure that it is effective and that it addresses the appropriate and relevant hazards. Assessments should be conducted by internal or external persons, or a combination of the two, who are knowledgeable about the program being evaluated.

Assessments differ from audits. Audits are systematic evaluations to determine if programs and related activities achieve planned expectations. They are used to review existing programs and ensure they are being carried out or executed as planned. Assessments go beyond review of program execution. They provide the opportunity to evaluate a program and determine if all hazards related to the program have been identified and if the program properly addresses those hazards through elimination, mitigation, or prevention. Assessment results and corrective actions taken should be documented. Common examples of assessments may include: integrated pest management assessments, food defense vulnerability assessments, allergen assessments, etc.

For example, an IPM assessment should include a variety of information gathered from the facility in order to make a reasonably accurate judgment about how the program is meeting the needs of the facility. The IPM assessment is a critical review of the entire food plant to identify existing pest issues and conditions or practices that could lead to pest issues. It is not just an equipment inventory or a way to report how many rodents were caught or killed. It should provide a reasonable answer about why pests were present in the first place so that proactive actions can be taken to avoid future activity. A well done IPM assessment includes all areas of a facility and takes into account areas surrounding the structure and how neighboring operations could impact the food plant. For example, a marsh or woodland near the plant

presents a different set of opportunities than a plant located in an industrial park or a residential area. Each of these settings needs to be evaluated for the steps that need to be taken to minimize the risks.

Too often plant grounds are not reviewed with a critical eye. There is a tendency to simply accept that the trees adjacent to the building and mulch beds have to be tolerated while fighting an ongoing battle with occasional invading insects inside the plant. These issues, plus a general lack of building maintenance, contribute to pest issues and will not improve until permanent alterations have been made.

Assessment findings should lead to determination of the root cause for the problem and science-based facts will direct the recommendations for corrective actions. Data collected will allow for trending analysis and clearly prove that the pests are present due to structural issues, not poor performance from the pest control service provider. A thorough inspection provides the information needed for the assessment to determine if the program, in conjunction with the plant's activities, is limiting the potential for pest activity.

Beyond the physical assessment, another important element of the process is a total review of records generated from the service provided. This provides a documented history of pest activity and prior treatment recommendations. Trends in activity should be noticeable. If records indicate that specific monitoring devices are frequently active and the physical site assessment reveals a poor door maintenance program in that same area, the data will strengthen the recommendation to take immediate action to repair the doors.

Data can also be used to measure if previously implemented recommendations have resulted in a positive impact. For example, if the data indicates 30% pest activity in a specific area before the recommendations were implemented, the post-implementation data might reveal that changes made have eliminated any sightings or records of activity.

Assessments are a critical part of good food safety programs. Detailed assessments of the facility and conditions provide data that is compared to events or occurrences to determine connections and look for trends occurring in related programs. If links between

documented events and observations made during the assessment can be established, you will have a strong argument for making recommended improvements.

Self-Inspections and Internal Audits Reference Card

Use this Self-Inspections and Internal Audits Reference Card as you contribute to your company's program. When you are ready, proceed to the workshops to apply what you have learned to real-life situations.

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Self-Inspections and Internal Audits

Reference Card

Self-Inspection

A physical evaluation of a moment in time used to identify positive or negative conditions and determine if programs are effective and being followed

Inspection Areas

- Grounds
- Roof
- Processing
- Warehousing
- Support areas
- Break rooms
- Locker rooms
- Offices

Inspection Tools

- Flashlight (15,000-20,000 lumens)
- Inspection mirror (polished metal, non-glass)
- Scraper/spatula
- Thermometer
- Basic hand tools for opening equipment (as allowed)
- Writing tablet and pen or handheld computer
- Camera or other recording device
- Keys to secured areas and gates

Internal Audit

A systematic evaluation of programs, policies, and documentation to determine if programs and related activities achieve planned expectations

Audit Areas

- Prerequisite programs
- HACCP
- HARPC
- Regulatory compliance
- Customer compliance
- Education and training

Programs to Review During Internal Audit

- Pest management
- Operations
- Quality assurance/quality control
- Customer complaints
- Transportation
- Training
- Others as applicable

Documentation

- Inspection findings
- Audit findings
- Corrective actions
- Root cause analyses
- Trends

Pre-Operational Inspections

Conducted just before a production line or production area begins operation

Post-Operational Inspections

Conducted immediately after a production line or area is shut down or after maintenance tasks are completed on production equipment or within production areas

Assessments

Used to evaluate a program to ensure that it is effective and that it addresses the appropriate and relevant hazards

Employee Interaction Workshop

During self-inspections and internal-audits, the food safety committee should interact with employees to assess their level of food safety knowledge and determine how well they understand their job responsibilities. The committee should ask a few individuals open-ended questions (versus those that prompt a yes or no reply) during their job activities to gauge their level of understanding.

For each of the following scenarios, write two questions you could ask an operator in the area that would help you determine their level of knowledge about the situation or subject. Then, compare your questions against the suggestions in the answer key.

Receiving Area

1. An operator is responsible for unloading pallets of bagged flour from a semi-trailer and inspecting the semi-trailer and shipment received. What questions would you ask to evaluate the employee's knowledge of trailer inspections?

2. Receiving operators are responsible for inspecting seals on bulk trailers of dry ingredients before unloading. What questions would you ask to evaluate the employee's knowledge of seal inspections?

Raw Material Warehouse and Cooler

1. Warehouse personnel are responsible for following first-in, first-out rotation practices for raw materials in the warehouse. What questions would you ask to evaluate the employee's knowledge of stock rotations practices?

2. Wheat flour, dry milk powder, and soy flour are located in the warehouse and your company has an allergen segregation policy that includes like-over-like storage practices. What questions would you ask to evaluate the employee's knowledge of allergens in the warehouse?

3. The cooler is to be maintained at 40°F or less. Employees are responsible for monitoring and documenting the temperature of the cooler at least once per shift. What questions would you ask to evaluate the employee's knowledge of temperature monitoring?

Production Area

1. Operators in production areas are responsible for general housekeeping during their shifts and during downtime. What questions would you ask to evaluate the employee's understanding of this requirement?

2. Employees working in a mixing area are responsible for scooping ingredients from containers, dumping them into the mixer, and recording lot numbers. What questions would you ask to evaluate the employee's knowledge of lot traceability?

3. The process has a small rack style oven for baking products in a batch process. The temperature of at least one product on the bottom rack and one on the top rack must be checked for each batch that is baked. The internal temperature of the product must be 165°F. This is a critical control point in the HACCP program. What questions would you ask to evaluate the employee's knowledge of temperature checks?

Packaging Area

1. Your facility produces and packages various types of snack bars. Some of the bars contain peanuts and others do not. The bars are packed in a clear plastic film and labels are then applied. Packaging operators are responsible for verifying that the correct label is present on the labeling machine and for recording the packaging lot numbers. What questions would you ask to evaluate the employee's knowledge of package procedures?

2. The snack bars being produced pass through a metal detector once they are packaged and labeled. Employees are responsible for checking the metal detector on an hourly basis with three different test wands, 1.0 mm ferrous, 1.5 mm non-ferrous, and 2.0 mm stainless steel. This is a critical control point in your HACCP program. What questions would you ask to evaluate the employee's knowledge of metal detectors?

These photos depict examples of issues an inspection team might discover during a self-inspection. Review the photos and the observations noted and determine the following:

- Significance of the issue
- Immediate corrective action
- Long-term corrective action

*Although there may be several issues identified in the photos, you only need to determine the significance and corrective actions for the issues described in the observation.

Cooling Unit on a Water Fountain

Observation: The interior of the floor-mounted water cooler located in the production area near line 4 was noted to have a significant accumulation of wet, rotted product debris. Numerous small flies were noted in the residue. Additionally, the base was badly rusted. Powdered residue was noted to have warehouse beetle cast skins and a few live adult beetles.

Significance of the observation:

Immediate corrective action:

Long-term corrective action:

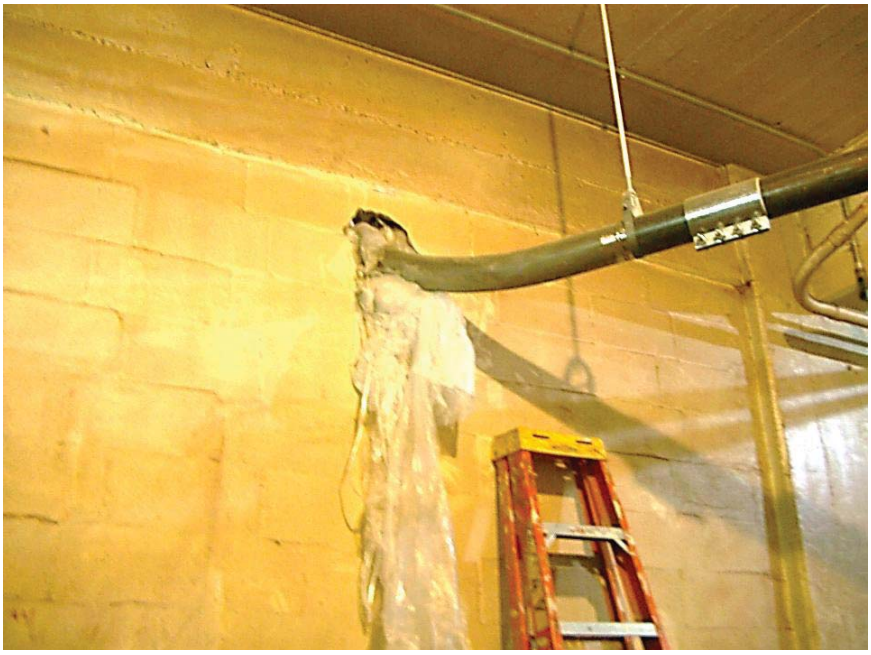
Oven Conveyors

Observation: A 2x4 piece of wood was noted between the transition between conveyors feeding the oven. Personnel indicated that maintenance was working on a piece of equipment next to this conveyor that morning and must have forgotten it there.

Significance of the observation:

Immediate corrective action:

Long-term corrective action:



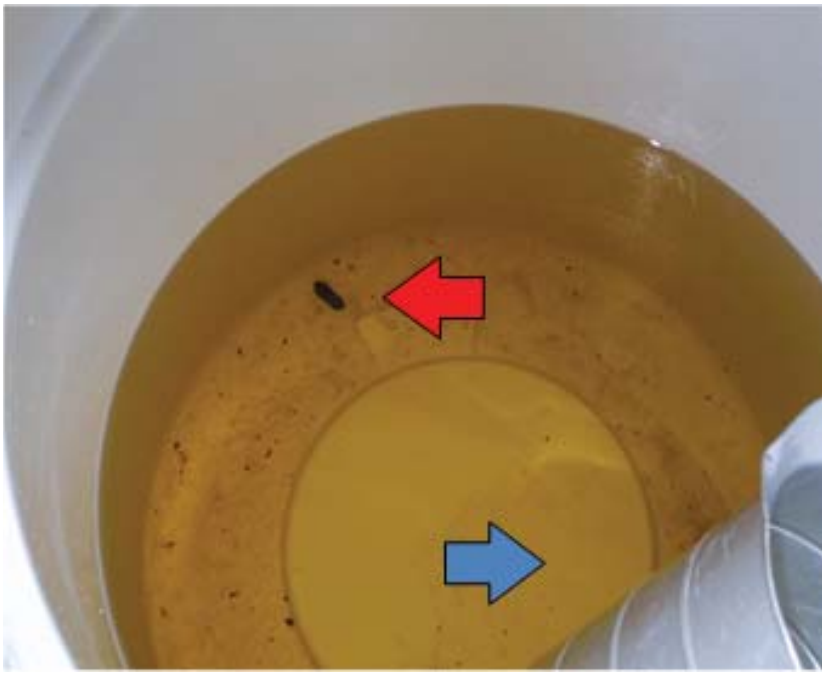
Observation: Plastic sheeting is stuffed in the wall opening for the new ingredient line contractors recently installed. Discussions with personnel indicated that this work was done about nine weeks prior to the inspection.

Significance of the observation:

Immediate corrective action:

Long-term corrective action:

Product Debris



Observation: Product debris (cinnamon) was noted in the bottom of the vegetable oil barrel in the cake department. The material was determined to be cinnamon topping from the Danish department that shares the ingredient barrel. The Danish department personnel removed and transferred the oil with their own utensil rather than the utensil provided. The barrel is routinely filled from an oil line located in the cake department.

Significance of the observation:

Immediate corrective action:

Long-term corrective action:

Dry Storage

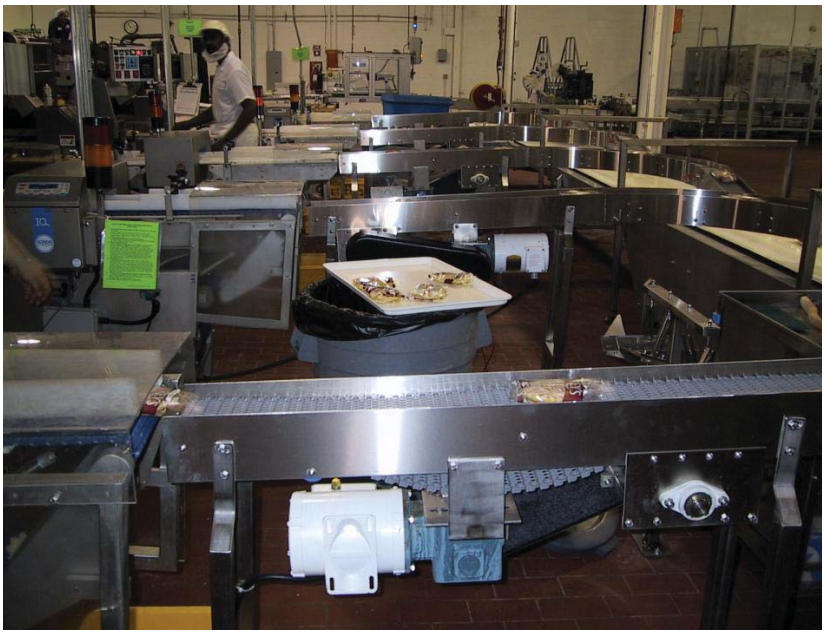
Observation: A slight dust accumulation was noted under the pallets in the dry storage section in aisle "D" of the dry goods warehouse beneath the bagged flour storage area. Cleaning schedules indicated that the area was cleaned 12 days ago as part of a two week cleaning cycle. No evidence of insect activity was noted in this area at the time of the inspection.

Significance of the observation:

Immediate corrective action:

Long-term corrective action:

Packaging



Observation: A gray barrel on a dolly with a white plastic tray on top was noted being used to collect the miswrapped product at the discharge of the packaging machine. Periodically throughout the shift, the machine operator moves the barrel to the in-feed section, unwraps the product, placing it on the in-feed to be rewrapped. The wrapper is discarded into the gray barrel. Once all the miswrapped product has been fed into the machine, the barrel is returned to the discharge end to place any additional miswrapped product.

Significance of the observation:

Immediate corrective action:

Long-term corrective action:

Bird Droppings

Observation: Bird droppings were noted on a pallet of finished product in the finished goods warehouse along the north wall. Overhead piping in this area also had several bird droppings on them. An opening was noted at the roof line and nesting materials were observed in the opening.

Significance of the observation:

Immediate corrective action:

Long-term corrective action: