

GMP Inspection Checklist

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1. Personnel and Training

1.1. Personnel Cleanliness Requirements

- a. CFR: Personnel must wear clean clothing suitable for the operation and maintain adequate personal cleanliness ([21CFR117.10\(b\)\(1\)](#)).
- b. Requirement: Workers handling food or equipment must wear clean clothes appropriate for their job and keep themselves personally clean at all times.
- c. Significance: Dirty clothing or poor hygiene can transfer bacteria or dirt to food, causing illnesses like food poisoning in consumers.
- d. Fix: Provide clean uniforms daily, enforce daily showers or hand washing routines, and inspect workers before shifts start.

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1. Personnel and Training

1.2. Hand Cleanliness During Operations

- a. CFR: Personnel must wash hands thoroughly and maintain hand cleanliness to prevent contamination ([21CFR117.10\(b\)\(3\)](#)).
- b. Requirement: Workers must keep hands clean and wash them regularly during food handling to avoid spreading germs.
- c. Significance: Hands are a major source of microbes that can spoil RTE foods and make people sick if not kept clean.
- d. Fix: Set up multiple sinks with soap and post signs reminding workers to wash hands every 30 minutes or after touching non-food items.

1. Personnel and Training

1.3. Removal of Jewelry and Stones

- a. CFR: Personnel must remove unsecured jewelry and other objects that might fall into food, equipment, or containers ([21CFR117.10\(b\)\(4\)](#)).
- b. Requirement: No loose rings, watches, or bracelets allowed on hands or wrists while working with food.
- c. Significance: Loose items can fall into food, causing choking hazards or physical contamination in RTE products.
- d. Fix: Use a policy requiring all jewelry removal at entry points and provide secure storage lockers near work areas.

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1.4. Perspiration Control

- a. CFR: Personnel must take precautions to prevent contamination of food from perspiration ([21CFR117.10\(b\)\(1\)](#)).
- b. Requirement: Wipe sweat from hands and arms promptly to prevent it from dripping into food during hot shifts.
- c. Significance: Sweat can carry skin bacteria into RTE foods, leading to spoilage or infections if consumed.
- d. Fix: Install fans or air conditioning in work areas and supply disposable wipes or towels for quick sweat removal.

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1. Personnel and Training

1.5. Hand Washing Before Starting Work

- a. CFR: Personnel must wash hands thoroughly before starting work and after each absence from their workstation ([21CFR117.10\(b\)\(3\)](#)).
- b. Requirement: All workers must wash hands with soap and water right before beginning a shift and after breaks or leaving their station.
- c. Significance: Unwashed hands after breaks can introduce germs from bathrooms or outside, contaminating ready-to-eat items.
- d. Fix: Place handwashing stations at shift start areas and use timers or checklists to ensure compliance every time.

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1. Personnel and Training

1.6. Hand Washing After Handling Personal Items

- a. CFR: Personnel must wash hands thoroughly after handling personal items that could contaminate food ([21CFR117.10\(b\)\(3\)](#)).
- b. Requirement: Wash hands immediately after using the restroom, touching phones, or handling any personal belongings.
- c. Significance: Personal items often harbor bacteria that can transfer to food, increasing risk of outbreaks in RTE foods.
- d. Fix: Train staff with signs at sinks saying "Wash after restroom or phone use" and audit logs of handwashing frequency.

1. Personnel and Training

1.7. Hand Washing After Touching Unclean Objects

- a. CFR: Personnel must wash hands after contacting unclean surfaces to prevent contamination ([21CFR117.10\(b\)\(3\)](#)).
- b. Requirement: Always wash hands after touching garbage, dirty tools, or any non-food surfaces during work.
- c. Significance: Dirty objects can spread pathogens like E. coli to hands, then directly to RTE products people eat without cooking.
- d. Fix: Designate "clean zones" and require glove changes or hand washes when crossing from dirty to food areas.

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1. Personnel and Training

1.8. Disease Reporting and Exclusion

- a. CFR: Personnel with illnesses, open lesions, or infections that could contaminate food must be excluded from operations ([21CFR117.10\(a\)](#)).
- b. Requirement: Sick workers with vomiting, diarrhea, or sores must stay home and report illnesses to supervisors.
- c. Significance: Ill workers can shed viruses like norovirus into food, causing widespread sickness in consumers of RTE meals.
- d. Fix: Create a simple illness reporting form and policy sending sick staff home immediately with paid sick leave incentives.

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1. Personnel and Training

1.9. Hair Restraint Policies

- a. CFR: Personnel must wear effective hair restraints to prevent contamination ([21CFR117.10\(b\)\(6\)](#)).
- b. Requirement: All staff with exposed hair must cover it completely with nets or hats while in production areas.
- c. Significance: Loose hair can fall into RTE foods, posing choking risks or carrying microbes that sicken eaters.
- d. Fix: Supply disposable hair nets at entry points and train managers to check compliance during daily walkthroughs.

1. Personnel and Training

1.10. No Eating or Smoking in Production Areas

- a. CFR: Personnel must not eat, drink, chew gum, or use tobacco in areas where food is exposed ([21CFR117.10\(b\)\(8\)](#)).
- b. Requirement: Ban all food, drinks, gum, or tobacco from food handling zones to avoid spit or crumbs in products.
- c. Significance: Eating in work areas introduces saliva bacteria or particles that can contaminate RTE foods and cause allergies or illness.
- d. Fix: Designate break rooms only for meals and post "No Eating Zone" signs with spot checks by supervisors.

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1. Personnel and Training

1.11. Protection from Clothing Contamination

- a. CFR: Personnel must take precautions to protect food and surfaces from contamination by clothing ([21CFR117.10\(b\)\(1\)](#)).
- b. Requirement: Avoid leaning on or touching food with clothes; change aprons if soiled.
- c. Significance: Dirty clothes can transfer chemicals or germs to RTE items, leading to unsafe products reaching customers.
- d. Fix: Use aprons that tie in back for easy removal and train on "no touch" rules for exposed foods.

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1. Personnel and Training

1.12. Training for Qualified Individuals

- a. CFR: Operations must be supervised by qualified individuals with training or experience to ensure safe food production ([21CFR117.80\(a\)\(3\)](#)).
- b. Requirement: Key staff must have documented training to oversee food safety and spot issues.
- c. Significance: Untrained supervisors miss hazards, allowing contaminated RTE foods to be produced and sold.
- d. Fix: Hold annual training sessions with certificates and assign a safety lead for each shift.

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1. Personnel and Training

1.13. Training to Recognize Issues

- a. CFR: Personnel must be trained to maintain sanitary conditions and prevent contamination ([21CFR117.10\(b\)](#)).
- b. Requirement: Train all employees to identify and report dirty equipment or hygiene lapses quickly.
- c. Significance: Spotting problems early prevents big contamination events that could recall products and harm health.
- d. Fix: Use short weekly toolbox talks with examples and quiz workers on recognition.

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1. Personnel and Training

1.14. Designated Sanitation Monitors

- a. CFR: Sanitation procedures must be monitored and documented to ensure compliance ([21CFR117.35\(a\)](#)).
- b. Requirement: Assign specific staff to check and record daily cleaning to ensure it's done right.
- c. Significance: Without checks, poor cleaning leads to bacteria buildup in RTE facilities, risking consumer illnesses.
- d. Fix: Create a daily log sheet for monitors to sign off on checks and rotate roles to keep it fresh.

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2. Plant and Grounds

2.1. Proper Storage of Equipment on Grounds

- a. CFR: Grounds must be maintained to prevent pest attractants, including proper storage of equipment and removal of litter ([21CFR117.20\(a\)\(1\)](#)).
- b. Requirement: Keep tools and waste stored neatly outside and mow grass regularly to deter rodents and insects.
- c. Significance: Clutter attracts pests that carry diseases into the plant, contaminating RTE foods indoors.
- d. Fix: Schedule weekly grounds cleanups and use covered bins for waste to block pest access.

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2. Plant and Grounds

2.2. Maintenance of Roads and Parking Lots

- a. CFR: Roads, yards, and parking lots must be maintained to prevent contamination sources ([21CFR117.20\(a\)\(2\)](#)).
- b. Requirement: Keep driveways and lots free of dust, oil, or standing water that could track dirt into the building.
- c. Significance: Muddy or dusty lots allow filth to be carried on shoes into production, dirtying RTE products.
- d. Fix: Pave or gravel lots and sweep daily; provide boot scrapers at entrances.

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2. Plant and Grounds

2.3. Adequate Drainage Around Plant

- a. CFR: Areas around the plant must be adequately drained to prevent contamination by seepage or foot-borne filth ([21CFR117.20\(a\)\(3\)](#)).
- b. Requirement: Ensure rainwater flows away from the building to prevent puddles that breed bacteria or track mud inside.
- c. Significance: Poor drainage creates wet spots where germs grow and spread via feet to food areas.
- d. Fix: Install gutters and gravel trenches; check after rains and fix clogs promptly.

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2. Plant and Grounds

2.4. Waste Treatment Systems

- a. CFR: Waste treatment and disposal systems must be operated to avoid contamination ([21CFR117.20\(a\)\(4\)](#)).
- b. Requirement: Manage trash and sewage systems so they don't leak odors or leaks near food zones.
- c. Significance: Leaking waste attracts flies and spreads odors that can taint RTE flavors or cause cross-contamination.
- d. Fix: Contract regular septic pumping and use sealed dumpsters emptied twice weekly.

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2. Plant and Grounds

2.5. Bordering Grounds Control

- a. CFR: Uncontrolled adjacent grounds must be inspected and protected to exclude pests and filth ([21CFR117.20\(a\)\(5\)](#)).
- b. Requirement: Regularly check fences and borders for pests coming from neighboring properties.
- c. Significance: Outside pests can sneak in and infest stored RTE ingredients, leading to recalls.
- d. Fix: Walk borders weekly with pest scouts and seal gaps in fences with mesh.

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2. Plant and Grounds

2.6. Adequate Space for Operations

- a. CFR: The plant must provide sufficient space for equipment and material storage to ensure sanitary operations ([21CFR117.20\(b\)\(1\)](#)).
- b. Requirement: Layout the facility with enough room to move around without bumping into food or tools.
- c. Significance: Crowded spaces cause accidental spills or touches that contaminate RTE batches.
- d. Fix: Map out floor plans annually and rearrange for better flow if needed.

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2. Plant and Grounds

2.7. Precautions Against Allergen Cross-Contact

- a. CFR: The plant must be designed to reduce the risk of allergen cross-contact through separation or controls ([21CFR117.20\(b\)\(2\)](#)).
- b. Requirement: Separate nut processing from dairy lines with walls or time schedules to avoid mix-ups.
- c. Significance: Allergen traces in RTE foods can cause severe reactions or deaths in sensitive customers.
- d. Fix: Validate separation with air tests and color-code tools for different allergens.

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2. Plant and Grounds

2.8. Protection for Outdoor Bulk Vessels

- a. CFR: Outdoor bulk vessels must be protected against contamination ([21CFR117.20\(b\)\(3\)](#)).
- b. Requirement: Cover tanks holding ingredients outside and inspect for bugs weekly.
- c. Significance: Exposed tanks let rain or pests in, spoiling bulk RTE supplies and wasting money.
- d. Fix: Use locked lids and schedule pest sweeps around vessels monthly.

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2. Plant and Grounds

2.9. Cleanable Floors, Walls, and Ceilings

- a. CFR: Floors, walls, and ceilings must be constructed to be cleanable and kept in good repair ([21CFR117.20\(b\)\(4\)](#)).
- b. Requirement: Use smooth, non-porous surfaces on walls and floors that wipe clean easily without cracks.
- c. Significance: Cracked surfaces hide bacteria that later contaminate cleaned RTE equipment.
- d. Fix: Inspect quarterly and repair chips with food-grade sealants.

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2. Plant and Grounds

2.10. Prevention of Drip Contamination

- a. CFR: Fixtures must be designed to prevent drip or condensate from contaminating food ([21CFR117.20\(b\)\(4\)](#)).
- b. Requirement: Seal pipes and ducts to stop water leaks from overhead onto production lines.
- c. Significance: Dripping water spreads microbes across RTE areas, increasing mold or bacterial growth.
- d. Fix: Install drip pans under condensers and check seals during monthly maintenance.

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2. Plant and Grounds

2.11. Adequate Aisles and Working Spaces

- a. CFR: Aisles and working spaces must be unobstructed and of adequate width to prevent contamination ([21CFR117.20\(b\)\(4\)](#)).
- b. Requirement: Keep at least 3-foot wide paths between machines for safe movement without touching foods.
- c. Significance: Narrow paths lead to bumps spilling ingredients or transferring dirt to RTE items.
- d. Fix: Mark aisles with tape and train on traffic flow rules.

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2. Plant and Grounds

2.12. Adequate Lighting in Key Areas

- a. CFR: Adequate lighting must be provided in hand-washing, dressing, toilet, and food handling areas ([21CFR117.20\(b\)\(5\)](#)).
- b. Requirement: Install bright LED lights (at least 50 foot-candles) in production and cleaning spots.
- c. Significance: Dim lights hide dirt or defects in RTE foods, allowing unsafe products out.
- d. Fix: Test light levels with a meter yearly and replace bulbs promptly.

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2.13. Shatter-Resistant Lighting

- a. CFR: Lighting must be protected to prevent contamination from breakage ([21CFR117.20\(b\)\(5\)](#)).
- b. Requirement: Coat all overhead lights with plastic guards where food is open below.
- c. Significance: Broken glass in RTE can cause injuries or force full product recalls.
- d. Fix: Retrofit all fixtures with guards and inspect for cracks monthly.

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2. Plant and Grounds

2.14. Ventilation to Minimize Dust and Odors

- a. CFR: Ventilation systems must minimize dust, odors, and vapors that could contaminate food ([21CFR117.20\(b\)\(6\)](#)).
- b. Requirement: Install exhaust fans to pull out steam and smells from cooking areas.
- c. Significance: Trapped odors or dust settle on RTE surfaces, altering taste or adding allergens.
- d. Fix: Clean vents quarterly and balance air flow to avoid pulling contaminants in.

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2. Plant and Grounds

2.15. Air-Blowing Equipment Operation

- a. CFR: Fans must be operated to minimize allergen cross-contact and contamination ([21CFR117.20\(b\)\(6\)](#)).
- b. Requirement: Direct fans away from open food lines to prevent blowing dust toward products.
- c. Significance: Misaimed air spreads particles like allergens across the facility into RTE batches.
- d. Fix: Map fan directions on a diagram and test airflow annually.

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2. Plant and Grounds

2.16. Protection Against Pests

- a. CFR: Effective measures, such as screening, must be used to protect against pests ([21CFR117.20\(b\)\(7\)](#)).
- b. Requirement: Screen all doors and windows to keep flies and rodents out of the building.
- c. Significance: Pests drop feces or hair into RTE foods, spreading diseases like salmonella.
- d. Fix: Install self-closing doors and repair screens immediately if torn.

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2. Plant and Grounds

2.17. Validated Allergen Control Plan

- a. CFR: Measures must be taken to prevent allergen cross-contact, including validated controls ([21CFR117.80\(a\)\(4\)](#)).
- b. Requirement: Document and test methods to keep allergens from mixing in shared spaces.
- c. Significance: Uncontrolled allergens cause life-threatening reactions in RTE consumers.
- d. Fix: Run swab tests quarterly and update plan based on results.

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3.1. Potable Water Supply

- a. CFR: Water contacting food or surfaces must be safe and of sanitary quality ([21CFR117.37\(a\)](#)).
- b. Requirement: Use only tested city or well water safe for drinking in all food processes.
- c. Significance: Unsafe water introduces pathogens directly into RTE foods, causing outbreaks.
- d. Fix: Test water annually via lab and post results; use filters if needed.

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3.2. Adequate Water Quantity and Pressure

- a. CFR: Running water must be provided at suitable temperature and pressure for all required operations ([21CFR117.37\(a\)](#)).
- b. Requirement: Ensure hot and cold water flows strongly at sinks for washing and processing.
- c. Significance: Weak water flow leaves residues on equipment, allowing bacteria to grow on RTE lines.
- d. Fix: Check pressure gauges monthly and upgrade pipes if low.

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3.3. Backflow Prevention in Water System

- a. CFR: Plumbing must prevent backflow to protect potable water supply ([21CFR117.37\(b\)\(1\)](#)).
- b. Requirement: Fit all hoses and faucets with devices stopping dirty water from flowing back into clean supply.
- c. Significance: Backflow contaminates the whole water system, tainting all RTE production.
- d. Fix: Inspect devices yearly by plumber and label them for easy checks.

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3.4. Handwashing Stations Availability

- a. CFR: Adequate hand-washing facilities with warm water, soap, and drying devices must be provided ([21CFR117.37\(e\)](#)).
- b. Requirement: Place sinks with soap and dryers near every work station for easy access.
- c. Significance: Lack of sinks means unwashed hands touch RTE foods, spreading germs easily.
- d. Fix: Install 1 sink per 10 workers and stock supplies daily.

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3.5. Toilet Facilities Accessibility

- a. CFR: Toilet facilities must be adequate, accessible, and maintained ([21CFR117.37\(c\)](#)).
- b. Requirement: Have enough clean restrooms close to production without long walks.
- c. Significance: Dirty or far toilets encourage poor hygiene, leading to hand contamination of foods.
- d. Fix: Clean toilets twice daily and add signs directing to nearest ones.

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3.6. Toilet Facility Cleanliness

- a. CFR: Toilet facilities must be kept clean and in good repair ([21CFR117.37\(c\)](#)).
- b. Requirement: Wipe down toilets and floors regularly to prevent odors or germs building up.
- c. Significance: Filthy restrooms breed bacteria tracked back to RTE areas on shoes or hands.
- d. Fix: Assign a daily cleaner and use checklists for inspections.

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3.7. Sewage Disposal Adequacy

- a. CFR: Sewage must be disposed of through an adequate system to prevent contamination ([21CFR117.37\(d\)](#)).
- b. Requirement: Connect to city sewer or septic that doesn't leak near the plant.
- c. Significance: Sewage leaks spread viruses like hepatitis to ground and into RTE water sources.
- d. Fix: Pump septic yearly and monitor for wet spots around drains.

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3.8. Waste Disposal from Plant

- a. CFR: Rubbish must be disposed of to avoid contamination and pest attraction ([21CFR117.37\(f\)](#)).
- b. Requirement: Use lidded bins for trash inside and out, away from doors.
- c. Significance: Open trash draws rodents that chew into RTE storage, spreading filth.
- d. Fix: Line bins with bags and schedule pickups to keep them from overflowing.

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4. Equipment and Utensils

4.1. Design to Prevent Contamination

- a. CFR: Equipment and utensils must be designed to prevent contamination and be cleanable ([21CFR117.40\(a\)\(1\)](#)).
- b. Requirement: Use smooth, rust-proof materials for all tools touching food.
- c. Significance: Poor design traps food bits where bacteria grow, spoiling RTE batches.
- d. Fix: Audit equipment yearly for cracks and replace non-compliant items.

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4. Equipment and Utensils

4.2. Corrosion-Resistant Surfaces

- a. CFR: Food-contact surfaces must be corrosion-resistant and made of non-toxic materials ([21CFR117.40\(a\)\(2\)](#)).
- b. Requirement: Choose stainless steel or plastic parts that don't rust or soak up liquids.
- c. Significance: Rusty or absorbent surfaces leach metals or hold moisture for microbial growth in RTE.
- d. Fix: Label approved materials and train buyers on specs.

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4. Equipment and Utensils

4.3. Easy Cleaning and Maintenance

- a. CFR: Equipment must be designed and maintained to facilitate cleaning ([21CFR117.40\(a\)\(3\)](#)).
- b. Requirement: Ensure machines have removable parts for thorough washing.
- c. Significance: Hard-to-clean gear harbors biofilms that contaminate every RTE run.
- d. Fix: Create disassembly guides and schedule deep cleans weekly.

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4. Equipment and Utensils

4.4. No Lubricants in Food Zones

- a. CFR: Lubricants on food-contact surfaces must be food-grade and safe ([21CFR117.40\(a\)\(5\)](#)).
- b. Requirement: Use food-grade oils only on bearings, never directly on food paths.
- c. Significance: Toxic lubes can drip into RTE, causing chemical poisoning if eaten.
- d. Fix: Store food-grade lubes separately and apply with droppers.

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4. Equipment and Utensils

4.5. Temperature Control Equipment Accuracy

- a. CFR: Equipment used for temperature control must be accurate and maintained ([21CFR117.40\(b\)](#)).
- b. Requirement: Calibrate fridges and thermometers to exact temps for RTE storage.
- c. Significance: Wrong temps let pathogens multiply in cold RTE salads or meats.
- d. Fix: Calibrate quarterly with certified tools and log results.

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4. Equipment and Utensils

4.6. pH and Water Activity Meters

- a. CFR: Instruments for measuring pH or water activity must be accurate and adequate ([21CFR117.40\(b\)](#)).
- b. Requirement: Use reliable meters to check acidity or moisture in recipes.
- c. Significance: Inaccurate readings allow unsafe levels where bacteria thrive in RTE sauces.
- d. Fix: Test meters against standards monthly and train one staff per shift.

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4. Equipment and Utensils

4.7. Equipment Maintenance Schedule

- a. CFR: Equipment must be maintained in a sanitary condition and repaired as needed ([21CFR117.40\(c\)](#)).
- b. Requirement: Inspect and fix broken parts before they affect production.
- c. Significance: Broken equipment leaks contaminants into RTE lines, risking quality loss.
- d. Fix: Use a maintenance calendar app for reminders and parts inventory.

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4. Equipment and Utensils

4.8. Frozen Equipment Handling

- a. CFR: Frozen foods must be kept frozen and thawed in a manner that prevents adulteration ([21CFR117.80\(b\)\(6\)](#)).
- b. Requirement: Thaw only what you use and discard extras to avoid bacterial risks.
- c. Significance: Refreezing creates ice crystals that harbor germs in RTE frozen meals.
- d. Fix: Portion control thawing in fridge and track usage logs.

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5. Processes and Controls

5.1. Supervision by Trained Personnel

- a. CFR: Operations must be supervised by competent individuals responsible for sanitation ([21CFR117.80\(a\)\(3\)](#)).
- b. Requirement: Have a trained person overseeing each shift to ensure safe practices.
- c. Significance: Unsupervised steps miss hazards, letting contaminated RTE reach shelves.
- d. Fix: Post shift lead rosters and rotate training to cover all.

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5. Processes and Controls

5.2. Raw Material Inspection

- a. CFR: Raw materials must be inspected to ensure they are clean and suitable for processing ([21CFR117.80\(b\)\(1\)](#)).
- b. Requirement: Check incoming ingredients for dirt or damage before accepting.
- c. Significance: Bad raw materials introduce toxins early, spoiling entire RTE batches.
- d. Fix: Train receivers with checklists and reject stamped lots.

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5. Processes and Controls

5.3. Raw Material Storage Conditions

- a. CFR: Raw materials must be stored to protect against contamination and deterioration ([21CFR117.80\(b\)\(1\)](#)).
- b. Requirement: Keep dry goods in sealed bins off floors, away from walls.
- c. Significance: Poor storage lets moisture or pests ruin ingredients for RTE mixes.
- d. Fix: Label shelves with dates and rotate stock FIFO.

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5. Processes and Controls

5.4. Supply Chain Ingredient Control

- a. CFR: Raw materials must be handled to ensure they meet safety specifications ([21CFR117.80\(b\)\(3\)](#)).
- b. Requirement: Only buy from vetted vendors who provide purity certificates.
- c. Significance: Unverified supplies can have undeclared allergens or contaminants in RTE.
- d. Fix: Maintain vendor approval list and audit annually.

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5. Processes and Controls

5.5. Work-in-Progress Handling

- a. CFR: Work-in-process must be handled to protect against contamination ([21CFR117.80\(c\)\(5\)](#)).
- b. Requirement: Cover partial batches and move quickly to next step.
- c. Significance: Exposed WIP picks up airborne dust or allergens, tainting final RTE.
- d. Fix: Use covered carts and time limits for staging.

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5. Processes and Controls

5.6. Finished Product Protection

- a. CFR: Finished products must be protected from contamination during holding ([21CFR117.80\(c\)\(6\)](#)).
- b. Requirement: Seal packages immediately after filling to block air and bugs.
- c. Significance: Open finished RTE allows recontamination before shipping.
- d. Fix: Inspect seals on line and quarantine if faulty.

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5. Processes and Controls

5.7. Temperature Monitoring for Growth Control

- a. CFR: Foods must be held at temperatures that prevent microbial growth ([21CFR117.80\(c\)\(3\)](#)).
- b. Requirement: Log fridge temps every 2 hours for perishable RTE.
- c. Significance: Warm spots let listeria grow in ready-to-eat deli meats.
- d. Fix: Use digital loggers with alarms and review logs daily.

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5. Processes and Controls

5.8. pH and Aw Monitoring

- a. CFR: pH and water activity must be controlled to prevent microbial growth ([21CFR117.80\(c\)\(15\)](#) and [21CFR117.80\(c\)\(14\)](#)).
- b. Requirement: Test each batch for safe acidity or dryness levels.
- c. Significance: Wrong pH allows botulism in low-acid RTE canned goods.
- d. Fix: Standardize recipes and calibrate meters before use.

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5. Processes and Controls

5.9. Oxygen Levels for Perishables

- a. CFR: Measures must be taken to control conditions that prevent microbial growth ([21CFR117.80\(c\)\(4\)](#)).
- b. Requirement: Use vacuum packaging for oxygen-sensitive RTE like cheeses.
- c. Significance: Excess oxygen speeds spoilage and mold in packaged RTE.
- d. Fix: Check vacuum seals and store in low-O₂ zones.

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5. Processes and Controls

5.10. Testing for Sanitation Failures

- a. CFR: Testing must be conducted to identify sanitation failures or contamination ([21CFR117.80\(a\)\(5\)](#)).
- b. Requirement: Swab surfaces weekly for bacteria counts.
- c. Significance: Undetected filth leads to chronic contamination in RTE lines.
- d. Fix: Send swabs to local lab and act on high results immediately.

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5. Processes and Controls

5.11. Environmental Pathogen Monitoring

- a. CFR: Testing must be conducted to identify possible contamination, including environmental pathogens ([21CFR117.80\(a\)\(5\)](#)).
- b. Requirement: Test zones for listeria monthly in wet RTE areas.
- c. Significance: Hidden pathogens in drains cause recalls and illnesses.
- d. Fix: Map high-risk zones and deep clean based on tests.

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5. Processes and Controls

5.12. Product Testing for Contaminants

- a. CFR: Testing must be conducted to ensure food safety and prevent adulteration ([21CFR117.80\(a\)\(5\)](#)).
- b. Requirement: Sample final RTE for metals or chemicals quarterly.
- c. Significance: Contaminants slip through without tests, harming eaters.
- d. Fix: Partner with affordable testing service and hold stock until cleared.

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5. Processes and Controls

5.13. Process Adjustments for Deviations

- a. CFR: Corrective actions must be taken when critical limits are not met ([21CFR117.80\(a\)\(6\)](#)).
- b. Requirement: Stop line and rework if temp exceeds safe limit.
- c. Significance: Deviations allow hazards to build, risking RTE safety.
- d. Fix: Write simple SOPs for common fixes and train all staff.

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5. Processes and Controls

5.14. Labeling to Prevent Cross-Contact

- a. CFR: Food must be handled and labeled to prevent allergen cross-contact ([21CFR117.80\(b\)\(8\)](#)).
- b. Requirement: Tag batches with allergen info during processing.
- c. Significance: Mislabels cause allergic reactions in RTE buyers.
- d. Fix: Use barcode systems for tracking allergens.

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6. Sanitation and Pest Control

6.1. General Plant Maintenance

- a. CFR: Buildings and facilities must be maintained in a sanitary condition to prevent adulteration ([21CFR117.35\(a\)](#)).
- b. Requirement: Repair leaks and clean floors daily to keep everything spotless.
- c. Significance: Dirty facilities breed germs that jump to RTE during production.
- d. Fix: Daily walkthrough checklists for all areas.

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6. Sanitation and Pest Control

6.2. Cleaning of Utensils and Equipment

- a. CFR: Utensils and equipment must be cleaned and sanitized to prevent contamination ([21CFR117.35\(a\)](#)).
- b. Requirement: Wash tools with hot soapy water then sanitizer after each use.
- c. Significance: Residues on tools transfer allergens or bacteria to next RTE batch.
- d. Fix: Set up a 3-sink system and time washes.

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6. Sanitation and Pest Control

6.3. Safe Cleaning Compounds

- a. CFR: Cleaning compounds must be safe and free from undesirable microorganisms ([21CFR117.35\(b\)\(1\)](#)).
- b. Requirement: Buy cleaners with supplier guarantees of purity.
- c. Significance: Contaminated cleaners add germs to surfaces, worsening RTE hygiene.
- d. Fix: Keep spec sheets on file and rotate stock.

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6. Sanitation and Pest Control

6.4. Storage of Toxic Materials

- a. CFR: Toxic materials must be stored to prevent contamination of food ([21CFR117.35\(b\)\(2\)](#)).
- b. Requirement: Lock chemicals in separate room away from food storage.
- c. Significance: Spilled toxins can poison RTE ingredients or workers.
- d. Fix: Label shelves "Chemicals Only" and inventory monthly.

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6. Sanitation and Pest Control

6.5. Pest Exclusion Measures

- a. CFR: Effective measures must be taken to exclude pests from the facility ([21CFR117.35\(c\)](#)).
- b. Requirement: Seal cracks and use door sweeps to block entry points.
- c. Significance: Pests contaminate with droppings, causing salmonella in RTE.
- d. Fix: Monthly pest audits and bait stations outside only.

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6. Sanitation and Pest Control

6.6. Pesticide Use Restrictions

- a. CFR: Pesticides must be used in a manner that prevents food contamination ([21CFR117.35\(c\)](#)).
- b. Requirement: Apply only by licensed pros when plant is empty.
- c. Significance: Pesticide residues on surfaces taint RTE taste and health.
- d. Fix: Document applications and wait 24 hours before reopening.

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6. Sanitation and Pest Control

6.7. Frequency of Food-Contact Cleaning

- a. CFR: Food-contact surfaces must be cleaned as frequently as necessary to prevent contamination ([21CFR117.35\(d\)](#)).
- b. Requirement: Scrub lines after every shift or product change.
- c. Significance: Buildup harbors listeria that survives to next RTE run.
- d. Fix: Schedule based on use and verify with ATP swabs.

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6. Sanitation and Pest Control

6.8. Dry Cleaning for Low-Moisture Foods

- a. CFR: For low-moisture foods, food-contact surfaces must be cleaned and kept dry ([21CFR117.35\(d\)\(1\)](#)).
- b. Requirement: Air dry or towel dry after washing dry food tools.
- c. Significance: Wet spots on dry lines grow mold in powdered RTE mixes.
- d. Fix: Use dedicated dry cloths and fan drying.

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6. Sanitation and Pest Control

6.9. Wet Processing Cleaning

- a. CFR: In wet processing, food-contact surfaces must be cleaned and sanitized before use and after interruptions ([21CFR117.35\(d\)\(2\)](#)).
- b. Requirement: Sanitize soup lines after breaks to kill any settled germs.
- c. Significance: Interruptions let biofilms form, contaminating RTE soups.
- d. Fix: Quick-rinse protocols for short stops.

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6. Sanitation and Pest Control

6.10. Continuous Operation Cleaning

- a. CFR: In continuous operations, food-contact surfaces must be cleaned as necessary during production ([21CFR117.35\(d\)\(2\)](#)).
- b. Requirement: Spot clean moving belts hourly in long runs.
- c. Significance: Uncleaned continuous lines accumulate debris over hours.
- d. Fix: Assign roving cleaners with portable kits.

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6. Sanitation and Pest Control

6.11. Single-Service Articles Handling

- a. CFR: Single-service articles must be stored and handled to prevent contamination ([21CFR117.35\(d\)\(3\)](#)).
- b. Requirement: Keep paper cups in sealed boxes off floor.
- c. Significance: Dirty disposables add fibers or germs to RTE packaging.
- d. Fix: First-in boxes and discard damaged ones.

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6. Sanitation and Pest Control

6.12. Non-Food-Contact Surface Cleaning

- a. CFR: Non-food-contact surfaces must be cleaned as necessary to protect food ([21CFR117.35\(e\)](#)).
- b. Requirement: Wipe machine exteriors weekly to prevent dust transfer.
- c. Significance: Dirty outsides shed particles onto clean insides during RTE.
- d. Fix: Use damp mops and schedule after production.

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6. Sanitation and Pest Control

6.13. Storage of Cleaned Equipment

- a. CFR: Cleaned equipment must be stored to protect food-contact surfaces ([21CFR117.35\(f\)](#)).
- b. Requirement: Hang utensils upside down in covered racks.
- c. Significance: Stacked wet tools recontaminate each other for next use.
- d. Fix: Dry racks with drains and cover when not in use.

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6. Sanitation and Pest Control

6.14. Pest Control Program Effectiveness

- a. CFR: An effective pest control program must be maintained to prevent contamination ([21CFR117.35\(c\)](#)).
- b. Requirement: Hire pros for quarterly treatments and monitor traps.
- c. Significance: Pests undetected spread throughout, ruining RTE reputation.
- d. Fix: Log trap checks and alert on any signs.

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6. Sanitation and Pest Control

6.15. Cleaning Documentation

- a. CFR: Sanitation monitoring and corrective actions must be documented ([21CFR117.35\(a\)](#)).
- b. Requirement: Sign off on each clean with who, when, and method.
- c. Significance: No records mean can't prove compliance during audits.
- d. Fix: Simple paper logs or app entries kept 2 years.

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7. Warehousing and Distribution

7.1. Storage Conditions Control

- a. CFR: Food must be held under conditions that prevent contamination and deterioration ([21CFR117.93\(a\)](#)).
- b. Requirement: Keep warehouse at 40-70°F with low humidity for dry RTE.
- c. Significance: Wrong conditions cause mold or pests in stored RTE packs.
- d. Fix: Install hygrometers and alarm if out of range.

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7. Warehousing and Distribution

7.2. Transportation Protection

- a. CFR: Food must be transported under conditions that prevent contamination ([21CFR117.93\(b\)](#)).
- b. Requirement: Use clean, covered trucks dedicated to food.
- c. Significance: Dirty trucks transfer chemicals or allergens to RTE shipments.
- d. Fix: Inspect vehicles pre-load and clean after each trip.

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7. Warehousing and Distribution

7.3. Allergen Cross-Contact in Holding

- a. CFR: Food must be held to prevent allergen cross-contact ([21CFR117.80\(c\)\(6\)](#)).
- b. Requirement: Segregate allergen packs in warehouse by type.
- c. Significance: Mixed storage leads to label errors and reactions.
- d. Fix: Color-coded shelves and double-check loads.

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7. Warehousing and Distribution

7.4. Stock Rotation Documentation

- a. CFR: Food must be held to prevent deterioration, implying FIFO rotation ([21CFR117.93\(a\)](#)).
- b. Requirement: Date all incoming and pull oldest for shipping.
- c. Significance: Old stock spoils, wasting money and risking bad RTE sales.
- d. Fix: Label with dates and train pickers on FIFO.

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7. Warehousing and Distribution

7.5. Finished Product Labeling for Allergens

- a. CFR: Food must be labeled to prevent allergen cross-contact ([21CFR117.80\(b\)\(8\)](#)).
- b. Requirement: Print bold allergen warnings on every RTE package.
- c. Significance: Poor labels cause accidental exposure in consumers.
- d. Fix: Review labels quarterly and use software for updates.

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7. Warehousing and Distribution

7.6. Temperature Abuse Checks on Receipt

- a. CFR: Raw materials must be inspected to ensure they are suitable for processing ([21CFR117.80\(b\)\(1\)](#)).
- b. Requirement: Probe chilled deliveries and reject if over 41°F.
- c. Significance: Warm receipts start bacterial growth before RTE processing.
- d. Fix: Handheld thermometers at dock and log rejections.

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7. Warehousing and Distribution

7.7. Distribution Temperature Monitoring

- a. CFR: Food must be transported under conditions that prevent microbial growth ([21CFR117.93\(b\)](#)).
- b. Requirement: Use reefers set to 35°F for cold RTE transport.
- c. Significance: Heat spikes in transit spoil RTE before delivery.
- d. Fix: Data loggers in trucks with post-trip reviews.

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8. By-Products for Animal Food

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8. By-Products for Animal Food

8.1. By-Product Storage to Prevent Contamination

- a. CFR: By-products for animal food must be stored to prevent contamination of human food ([21CFR117.95\(a\)](#)).
- b. Requirement: Keep scraps in separate, sealed area away from human RTE.
- c. Significance: Mixed storage contaminates edible human by-products.
- d. Fix: Dedicated bins labeled "Animal Only" in isolated room.

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8. By-Products for Animal Food

8.2. Handling of By-Products

- a. CFR: By-products must be handled to prevent contamination of human food ([21CFR117.95\(b\)](#)).
- b. Requirement: Use dedicated tools for moving scraps to avoid cross-touch.
- c. Significance: Shared tools transfer human food germs to animal feed lines.
- d. Fix: Color-code scoops and clean separately.

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8. By-Products for Animal Food

8.3. Transportation of By-Products

- a. CFR: By-products must be transported to prevent contamination of human food ([21CFR117.95\(c\)](#)).
- b. Requirement: Use covered trailers only for animal feed scraps.
- c. Significance: Open transport spills attract pests near plant.
- d. Fix: Schedule off-hour pickups and inspect vehicles.

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8. By-Products for Animal Food

8.4. Container Inspection for By-Products

- a. CFR: Containers for by-products must be inspected to ensure suitability ([21CFR117.95\(d\)](#)).
- b. Requirement: Check bins for cleanliness before filling with scraps.
- c. Significance: Dirty containers add contaminants to feed, indirectly affecting plant.
- d. Fix: Pre-use wash and log inspections.

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8. By-Products for Animal Food

8.5. Accurate Labeling of By-Products

- a. CFR: By-products must be accurately labeled to prevent misuse ([21CFR117.95\(e\)](#)).
- b. Requirement: Tag all with "Not for Human Food - Animal Use Only".
- c. Significance: Mislabels risk accidental human use of unfit scraps.
- d. Fix: Use tamper-proof tags and train fillers.

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9. Defect Action Levels

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9. Defect Action Levels

9.1. Minimizing Natural Defects

- a. CFR: Quality control operations must minimize natural or unavoidable defects to acceptable levels ([21CFR117.110\(a\)](#)).
- b. Requirement: Set limits for things like insect parts in grains and test regularly.
- c. Significance: High defects make RTE unappetizing or unsafe if over limits.
- d. Fix: Buy from low-defect suppliers and screen incoming.

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9. Defect Action Levels

9.2. Procedures for Defective Foods

- a. CFR: Defective foods must be handled to prevent mixing with safe food ([21CFR117.110\(b\)](#)).
- b. Requirement: Quarantine bad batches separately and dispose properly.
- c. Significance: Mixed defects lower overall RTE quality and trigger recalls.
- d. Fix: Clear SOP with flowcharts and train on segregation. --