

Small Plant NEWS

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Small Plant NEWS

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Common Food Safety Violations Documented by Federal Regulatory Agencies, Part I

By Jeff Tarrant, Commander, U.S. Public Health Service

In July 2011, the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) and Agricultural Marketing Service (AMS), and the U.S. Department of Health and Human Services' (HHS) Food and Drug Administration (FDA) developed a food safety cross training program to strengthen communication and collaboration efforts between USDA and HHS agencies on food safety issues in shared jurisdiction facilities. As part of the program, the agencies devised a method for reporting food safety violations to the appropriate organization if employees observed something questionable while conducting their normal day-to-day duties at federally regulated establishments.

So, what were the common violations noted by all three agencies? The *Small Plant News* editorial staff decided to answer this question by examining "significant observations" from each agency's training material. What we found is best broken down by these categories: General Facility, Processing, Storage, and Employee Health and Hygiene. We'll examine each of these in detail in this issue and in a future issue of *Small Plant News*.

General Facility Observations

Some common issues that arise during inspections involve the structure in which the establishment is housed and the grounds surrounding it. For instance, are interior and exterior structural conditions properly designed and maintained? Are doors, windows, and openings sealed and screened to prevent the entry of rodents, birds, and insects? Do the grounds adjacent to your building provide harborage or breeding areas for rodents or pests, e.g., tall grasses, improperly disposed garbage, and abandoned buildings?



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Poor construction and maintenance can allow vermin and dust to enter, which can result in food products becoming adulterated. Poorly maintained buildings can also promote the growth of pathogens. Federal inspectors have documented numerous instances of peeling paint, rusting metal, torn plastic curtains, and broken racking systems, sometimes adjacent to raw or cooked food products. All too often, these materials become breeding grounds for viruses, bacteria, and environmental contaminants. Additional General Facility observations include cluttered establishments that do not permit proper cleaning or safe passage between equipment and non-operational exit doors, and inadequate emergency lighting.



Processing Observations

Common violations often documented by Federal food safety agencies include food contact equipment that is not adequately cleaned and sanitized prior to use, unsanitary conditions noted adjacent to food processing lines, and cleaning operations that are inadequate or that contaminate food-contact surfaces. A good example is crusted or old food particles noted on processing equipment. In addition, unclean equipment, such as hoses, containers, and mixing utensils, is often found in contact with finished food products. In these instances, if no kill steps, such as cooking, are applied in the establishment's production process, then the food products must be considered contaminated or adulterated. Of particular concern is condensate or waste lines dripping fluid onto food-contact surfaces, stored food containers, or food. Condensate is often seen in areas where steam is produced or in cold storage, especially where food products are placed to cool. In these instances, ceilings and surfaces of overhead equipment may not be cleaned frequently or adequately, leading to mold growth or the colonization of pathogens, such as *Listeria monocytogenes*.



Federal food agency inspections have also documented the presence of odors in processing areas. In some cases, these can indicate a possible problem with containment of gases (e.g., an ammonia system leak).

Two issues that all food safety agencies document involve facility employees placing food that has touched non-food-contact surfaces back into the processing lines without applying a kill step and inadequately separating food products not intended for human consumption from edible products. The first can be as simple as dropping food on the floor and placing it back on the line. These employee practices provide a route of contamination between non-food-contact surfaces, such as floors, pallets, or other equipment, and food-contact surfaces. The latter is often noted when establishments don't separate denatured or contaminated food products from products destined for shipment. In either case, foodborne pathogens can be spread to food products, thereby rendering them adulterated.

In the next issue of *Small Plant News*, we'll tackle common food safety violations noted by Federal regulatory agencies that fall under Storage and Employee Health and Hygiene categories.

For more information on regulatory requirements, visit the following food safety agencies' Web sites at www.fsis.usda.gov, www.fda.gov, and www.ams.usda.gov. If you have any further questions about significant observations, contact FSIS' Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or email InfoSource@fsis.usda.gov.

Updated *Small Plant News* Index Available

By Jane Johnson, DVM

The screenshot shows the FSIS News & Events website. On the left is a search bar with a 'Go' button and a dropdown menu for 'All FSIS'. Below the search bar are links for 'Search Tips' and 'A to Z Index'. There are also sections for 'Browse by Audience' (Information For...) and 'Browse by Subject' (Food Safety Education, Science, Regulations & Policies, FSIS Recalls). The main content area is titled 'News & Events' and 'Small Plant News'. It features a section for 'Index, Volumes 3 and 4' with an alphabetical index: A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P | Q | R | S | T | U | V | W | Z. Below the index is a table titled 'FSIS Small Plant News, Volumes 3 and 4' with columns for 'Topic', 'Issue(s) (PDF)', and 'HTML Text'. The first row shows 'Antimicrobial Agents' under 'A', with 'Vol. 3, No. 7, Page 4' and a 'Text' link. On the right side of the page is a sidebar menu for 'News & Events' with categories like News Releases, Meetings & Events, Speeches & Presentations, Communications to Congress, Newsletters & Magazines (including be FoodSafe: The FSIS Magazine, Constituent Update, Small Plant News, Email Subscription Service, EdNet, USDA News Releases, USA.gov Newsletters), and Image Libraries.

Let's say you have a question about Occupational Safety and Health Administration (OSHA) records. You vaguely remember reading an article about that very topic in the *Small Plant News*; however, you can't remember which issue, although you're pretty sure that it's been within the last couple of years. The information was helpful, and it would be nice if you could read it again. So what do you do?

Try using the recently posted *Small Plant News* index. The *Small Plant News* index makes your search simple. It is arranged alphabetically by subject and lists the volume and number of the issues where that subject may be found, along with the page numbers.

The link to the most recent index, covering Volumes 3 and 4, may be found on the FSIS Web site at www.fsis.usda.gov/News_&_Events/Small_Plant_News/index.asp. (The link to the index for Volumes 1 and 2 may be found on the same Web page as well.) When you click on the link(s) listed next to the subject, you will be taken to the appropriate section of the newsletter containing the information you need.

If you have any questions on the index or wish to receive a printed copy of the index, please contact the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) for assistance.

Your Input Is Welcome!

The *Small Plant News* staff strives to provide you with accurate and helpful information to assist you with meeting FSIS regulations and producing the safest food possible. To make sure this newsletter meets your needs, we want to hear from you.

Tell us what topics you want to read about and the type of information you find most useful. Let us know what works, as well as what needs improvement. We also invite you to comment on specific articles. Was there a particular article that you liked or didn't like? Was it too long? Did it have too much detail or too little detail? Did you get the information you hoped to get when you read it? We are interested in what you have to say.

To contact the *Small Plant News* editorial staff, you may write to the following address:

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Office of Outreach, Employee Education, and Training
Food Safety and Inspection Service
United States Department of Agriculture
Patriots Plaza III, 9th Floor, Room # 9-267A
Mail Stop 3778
1400 Independence Ave., SW
Washington, DC 20250

If you prefer, you may send an e-mail to SmallPlantNews@fsis.usda.gov.

We won't be able to provide any individual responses to your comments, but we will use them to make *Small Plant News* one of the best resources possible. We appreciate you, our readers, and look forward to hearing from you!

Policy Point Web Page

By Jane Johnson, DVM

The screenshot shows the USDA Food Safety and Inspection Service website. The main content area is titled "Regulations & Policies" and "Compliance Assistance". Under "PolicyPoints", there is a list of topics: Allegens, Exports, E. Coli O157:H7, Epidemiology/Public Health, Exemptions, HACCP, Homeland Security, Imports, Residue, Retail Enforcement, Salmonella, Sampling, Sanitation Standard Operating Procedures, Slaughter Inspection, Specified Risk Material, Other, and Voluntary Services. A sidebar on the left offers search and browse options, and a right sidebar lists various regulatory and policy categories.

In order to promote a uniform understanding of Agency notices, directives, and other issuances, FSIS has developed a Web page titled “PolicyPoints” that can be accessed at www.fsis.usda.gov/Regulations_&_Policies/Policy_Points/index.asp. PolicyPoints features PowerPoint presentations on a variety of topics, including:

- Exports,
- *E. coli* O157:H7,
- Epidemiology/Public Health,
- Exemptions,
- Hazard Analysis and Critical Control Point (HACCP),
- Homeland Security,
- Imports,
- Residue,
- Retail Enforcement,
- *Salmonella* Performance Standards,
- Sampling,
- Sanitation Standard Operating Procedures,
- Slaughter Inspection,
- Specified Risk Material, and
- Voluntary Services.

The presentations may be viewed online or downloaded to your computer. For those without Microsoft PowerPoint, you may download a viewer through a link provided on the Web page. The presentations are also available as PDFs and may be viewed with Adobe Reader.

For more information or questions about accessing the FSIS Web site, please contact the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or email InfoSource@fsis.usda.gov.