Introduction

This course is intended to assist the seafood industry in developing and implementing 'Sanitation Control Procedures' as mandated by the U.S. Food and Drug Administration (FDA). This regulation is commonly known as the "Seafood HACCP Regulation" which became effective December 18, 1997. Since this date, seafood processors have been required to 'monitor' sanitary control procedures used during processing in order to show their conformance with good sanitary conditions and practices. Likewise, seafood importers must verify that the seafood being imported was processed in accordance with the same FDA mandated HACCP requirements that include sanitation monitoring procedures and records. This is a new and challenging regulatory approach which will require understanding and cooperation by all levels of the seafood industry and the respective inspection authorities.

Course Purpose:
To assist industry in developing and implementing Sanitation Control Procedures as mandated by FDA's "Seafood HACCP Regulation" (21CFR, Parts 123 & 1240).

Course Objectives:
◆ How to develop Sanitation Standard Operating Procedures (SSOP);
◆ How to conduct monitoring for sanitary "conditions and practices"; and
◆ How to maintain sanitary conditions and practices.
Course Application

This Sanitation Control Procedures training will apply to fish and fishery product processing defined as:

Fish, which means fresh or saltwater finfish, crustaceans, other forms of aquatic animal life (including, but not limited to, alligator, frog, aquatic turtle, jellyfish, sea cucumber, and sea urchin and the roe of such animals) other than birds and mammals, and all mollusks, where such animal life is intended for human consumption;

Fishery product, which means any human food product in which fish is a characterizing ingredient; and

Processing which, with respect to fish and fishery products, means; handling, storing, preparing, heading, eviscerating, shucking, freezing, changing into different market forms, manufacturing, preserving, packing, labeling, dockside unloading, or holding.

Processing as defined by the seafood HACCP regulations does not apply to:

* Harvesting or transporting fish or fishery products, without otherwise engaging in processing.
* Practices such as heading, eviscerating, or freezing intended solely to prepare a fish for holding on-board a harvest vessel.
* The operation of a retail establishment.

Course Content

Rather than a basic food sanitation course, this training format features the regulatory requirements for monitoring sanitary conditions and practices, encourages development of written SSOP, and offers background information on basic sanitation. Course participants should learn how to draft SSOP plans and build sanitation monitoring programs to address eight key sanitary conditions. Proper plans and monitoring should lead to proper practices. Background information is provided to assist in developing proper sanitary practices. Course completion is only a start. The primary measure of success will be based on in-plant performance.

I-2. Elements of the Course:

1. Sanitation Standard Operating Procedures (SSOP);
2. Sanitation Monitoring and Corrections; and

The course includes a chapter for each of the eight key sanitation conditions or areas specified by the FDA Seafood HACCP Regulations. Each of these course chapters are organized in three parts — 1) required sanitation monitoring, corrections and records; 2) related background information on sanitation; and 3) example sanitation control guides.
I-3. **Course Chapters – 3 Parts:**
1. Sanitation monitoring, corrections and records;
2. Background information on sanitation; and
3. Sanitation Control Guides (examples).

I-4. **Course Agenda – Sanitation Control Procedures**

8:00 a.m. Registration and Welcome

8:30 a.m. Introduction

9:30 a.m. Safety of Water

10:00 a.m. Break

10:30 a.m. Condition and Cleanliness of Food Contact Surfaces (two parts)

    Lunch

1:15 p.m. Prevention of Cross-Contamination

1:45 p.m. Maintenance of Hand Washing, Hand Sanitizing and Toilet Facilities

2:15 p.m. Protection of Food from Adulterants and Proper Labeling, Storage and Use of Toxic Compounds

2:45 p.m. Break

3:15 p.m. Control of Employee Health Conditions

3:45 p.m. Exclusion of Pests

4:15 p.m. Example of SSOP Plan and Sanitation Control Records

    Adjourn
The chapters progressively build and explain a typical monitoring form for both daily and monthly sanitation control records. The recording form used is taken from the Seafood HACCP Alliance’s “Encore” HACCP course to illustrate a variety of considerations in designing a monitoring record. The particular “Encore” Training form is not required to comply with the federal HACCP mandate, but it does include features that processors should consider in developing monitoring forms for their specific processing operations.

The course offers a variety of monitoring forms to illustrate approaches to customizing the sanitation records to suit particular processing operations. Although, there are no federally mandated frequencies for sanitation monitoring for either daily or periodic records, the course suggests frequencies in monitoring that would satisfy conformance with the conditions and practices specified in the Good Manufacturing Practices (GMP). Frequency for monitoring must be appropriate to the plant and food being processed.

The chapters conclude with example “Sanitation Control Guides” that can be referenced when developing a sanitation monitoring program (I-6). The Sanitation Control Guides are not specified regulatory requirements. They are simply provided as a guide or reference. Each guide deals with one of the eight key sanitary conditions. These guides identify key sanitation concerns and provide examples of problems and issues often encountered in processing. They list recommended controls, monitoring procedures and corrections. The listed frequencies for monitoring are only recommendations which may vary for particular processing conditions and foods. In most of the chapters, more than one Sanitation Control Guide is provided because a variety of plant procedures may affect any one of the eight key sanitation conditions.

The Sanitation Control Guides are not SSOP per se, but may be used as a foundation for developing company-specific SSOP. Sanitation Standard Operating Procedures should clearly list company procedures for complying with the sanitation monitoring requirements of the FDA Seafood HACCP regulation and the Good Manufacturing Practices (Appendix). A firm’s SSOP should include step-by-step details, such as describing the type of sanitizers used, where they are used, how they are applied, when they are applied, and in what concentrations. A simple example of a complete SSOP plan is provided in the last chapter, “Example SSOP Plan and Sanitation Control Records.” It contains a monitoring form that is formatted differently than the example used in other parts of the course. This illustrates the need to use a form that matches each company’s SSOP. Regardless of the approach, any resulting SSOP plan should reflect the procedures and character of the particular processing operation.

### I-5. Frequency for Monitoring

Frequency for monitoring sanitation practices and conditions are not specified in the FDA Seafood HACCP Regulations, but are recommended in this Alliance course as an optional guideline to help ensure conformance with the Good Manufacturing Practices (GMP) that should be appropriate to the plant and food being processed.
## I-6. Example Sanitation Control Guide

<table>
<thead>
<tr>
<th>Sanitation Control Guide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Entry date:</td>
</tr>
</tbody>
</table>

**Concern:** Food contact surfaces may appear clean but harbor pathogens

**Examples:**

Bacteria may be present in crevices, overlapping joints or hidden areas difficult to inspect. Clearly visible surfaces may be coated with invisible biofilms containing bacteria. Some surfaces may be stained with minerals or water scale making visual inspection difficult. Chemicals used for cleaning and sanitizing must be appropriate and effective without harming the equipment, utensils or environment of discharge.

**Controls and Monitoring:**

Visual check of all food contact surfaces for proper cleaning and sanitation. Use a strong flashlight or other shadow-free lighting source when inspecting hidden areas. Disassemble and inspect food contact equipment to identify areas which may trap soils. **Frequency:** Daily pre-op for raw seafood line, plus after every break for ready-to-eat line.

Confirm visual checks with bacterial contact plates or luminometer. **Frequency:** Monthly or more frequently if results indicate. (Note: swabs are used in place of contact plates in areas that are difficult to access). Luminometer — weekly or more frequently if results indicate.

Visually confirm that proper procedures, equipment and chemicals are used for cleaning and sanitizing. Use five-step approach. Use test papers to record proper strength for sanitizers. **Frequency:** Daily pre-op for raw seafood line, plus after every break for ready-to-eat line.

- Pans, knives, and other utensils are placed in a soak tank containing general purpose detergent (concentration controlled by proportioner). After soaking 30 mins. the items are rinsed and dipped in sanitizer (100 ppm chlorine).
- All processing waste removed from work areas, and tables and floors are dry cleaned. Tables are cleaned with general purpose detergents followed by rinsing then exposure to 200 ppm chlorine. Floors, splash zone of walls (4 feet above floor), and sinks are cleaned then sanitized with 400 ppm quats or 200 ppm chlorine.
- Periodically (weekly) use an acid detergent to remove stains and scale
- Periodically switch (monthly) to another class of sanitizer to prevent selecting tolerant types of microorganisms.

**Recommended Corrections:**

If surfaces are inadequately cleaned, fully reclean and resanitize following the five-step procedures. Check sanitizer concentrations. Train employees semiannually or more frequently if indicated by monitoring.

**Records:**

- Daily Sanitation Control Record
- Contact Plate Record (confirmation)
- Employee Training Record
Sanitation Control Procedures in the HACCP Regulation

The Seafood HACCP Regulation recommends ("should") that each processor have and implement written Sanitation Standard Operating Procedures (SSOP), and requires ("shall") that they monitor the sanitary conditions and practices during processing. In turn, many states have adopted this regulatory approach and it is a recognized requirement for interstate and international commerce. This FDA regulation is specifically referenced as Title 21 in the Code of Federal Regulations (CFR), Parts 123 and 1240 (21 CFR, Part 123 & 1240), "Procedures for the Safe and Sanitary Processing and Importing of Fish and Fishery Products." This regulation became effective December 18, 1997. The specific wording from the regulation is provided in the Appendix. A review of the rule is provided in Chapter 12, "The Seafood HACCP Regulation" in the Alliance’s HACCP: Hazard Analysis and Critical Control Point Training Curriculum (see Chapter References). The CFR and Alliance Chapter should be referenced to better understand the basic HACCP requirements.

1-7. Sanitation Control Procedures are an integral part of the Seafood HACCP Regulation:

1. Processors ‘should’ have and implement a written SSOP plan;
2. Processor ‘shall’ monitor the sanitary conditions and practices;
3. Processors “shall” correct insanitary conditions and practices in a timely manner; and
4. Processors “shall” maintain sanitation control records.

FDA included sanitation control procedures as an integral part of the seafood HACCP regulations to encourage processors to pay more attention to routine sanitary practices. FDA felt the additional controls were necessary because:

- sanitation practices directly affect the microbiological safety of seafood products that are not further cooked by the consumer, such as, ready-to-eat products, smoked products, raw molluscan shellfish, and other fish that are consumed raw;

- sanitation practices are relevant to the microbiological safety of seafood products even where these products are to be cooked by the consumer;

- sanitation practices directly affect the chemical and physical safety of seafood products;

- nearly half of the consumer complaints that FDA receives relating to seafood are related to the processing plant or food hygiene; and

- inspections conducted by FDA and the National Marine Fisheries Service (NMFS) demonstrate that a significant portion of seafood processors operate under poor sanitation conditions.
According to existing laws, any food processed under ‘insanitary’ conditions is adulterated because the food may be contaminated with filth, or substances that could render the food injurious to health [Food Drug & Cosmetic Act, section 402(a)(4)]. The current Good Manufacturing Practice (GMP) regulations were issued (Chapter 21 CFR Part 110) to help prevent these problems. These GMP have been and continue to be applicable to all foods including fishery products. They outline the basic conditions and practices that must be followed in order to avoid adulteration. A complete copy of these regulations is contained in the Appendix.

The new mandated sanitation control procedures focus on specific parts of the GMP. They introduce new requirements for monitoring, corrections, and recordkeeping that are not specified in the GMP. The HACCP-like features for monitoring and record keeping were considered necessary “to develop a culture throughout the seafood industry in which processors assume an operative role in controlling sanitation in their plants.” In other words, application of the existing GMP across the seafood industry in both domestic and international settings was not evident at sufficient levels to advance seafood safety. Monitoring and recording were deemed necessary to encourage appropriate sanitary conditions and practices on a more routine basis.

I-8. Why Monitor Sanitation Control Procedures?

“. . . to develop a culture throughout the seafood industry in which processors assume an operative role in controlling sanitation in their plants.”

Together the sanitation control procedures and GMP form the foundation for a complete seafood safety program topped with a HACCP program that is product and process specific. HACCP cannot succeed in a plant that does not have adequate GMP.

I-9. Food Safety Control Program

- HACCP
- Sanitation Control Procedures
- Good Manufacturing Procedures (GMP)
CCP vs. Sanitation Control Procedures

A complete food safety program includes both a HACCP plan and the accompanying sanitation control procedures based on GMP. Both components require monitoring, corrections and recordkeeping, yet there are a few regulatory subtleties that should be distinguished for each component.

The HACCP plan for seafood safety is built on a hazard analysis that reveals specific critical control points (CCP) that must be monitored to ensure that a processing step or procedure is in control so as to prevent, eliminate, or reduce to an acceptable level, any potential food-safety hazard. The written HACCP plan specifies the various CCP for a particular process and details the critical limits, monitoring methods, corrective actions, verification procedures and records to be used to assure that control is maintained at a CCP.

I-10.
CCP: A step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.

Sanitation Control Procedure: Procedure to maintain sanitary conditions usually related to the entire processing facility or an area, not just limited to a specific processing step or CCP.

Some hazards are best controlled through sanitation control procedures. Relegating control of a hazard to sanitation control procedures rather than HACCP does not minimize its importance. It simply may be the most appropriate means of control. Frequently, both HACCP and sanitation control procedures are necessary to control a hazard. For example, under HACCP a critical control point is implemented at a smokehouse to make sure sufficient heat is applied to kill potential pathogenic bacteria. Sanitation monitoring to ensure proper employee hygiene and plant sanitation is necessary to minimize the potential for recontaminating the product after smoking.

I-11. Identified hazards . . .
. . . which are inherent to the product or are associated with a discrete processing step must be controlled with HACCP. Hazards associated with the processing environment or personnel are usually better controlled with sanitation control procedures.

Identified hazards which are inherent to the product or are associated with a discrete processing step must be controlled with HACCP. Hazards associated with the processing environment or personnel are usually better controlled with sanitation control procedures. Sanitation monitoring can be used to control hazards associated with the eight sanitation areas listed in the HACCP regulation and covered in this course. Use HACCP to control product and process-related hazards identified in FDA’s Fish and Fishery Products Hazards and Controls Guide. Some examples of these distinctions are provided in Table I-12.
I-12. Differentiating HACCP and Sanitation Control Procedures

<table>
<thead>
<tr>
<th>Hazard</th>
<th>Control</th>
<th>Type of Control</th>
<th>Control Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Histamine</td>
<td>Time &amp; temperature of scombroid fish</td>
<td>Product specific</td>
<td>CCP</td>
</tr>
<tr>
<td>Pathogen Survival</td>
<td>Time &amp; temperature for smoking fish</td>
<td>Processing step</td>
<td>CCP</td>
</tr>
<tr>
<td>Contamination with pathogens</td>
<td>Wash hands before touching product</td>
<td>Personnel</td>
<td>Sanitation</td>
</tr>
<tr>
<td>Contamination with pathogens</td>
<td>Limit employee movement between raw and cooked areas</td>
<td>Personnel</td>
<td>Sanitation</td>
</tr>
<tr>
<td>Contamination with pathogens</td>
<td>Clean and sanitize food contact surfaces</td>
<td>Plant environment</td>
<td>Sanitation</td>
</tr>
<tr>
<td>Chemical contamination</td>
<td>Use only food-grade grease</td>
<td>Plant environment</td>
<td>Sanitation</td>
</tr>
</tbody>
</table>

The distinction between CCP and sanitation control procedures is not always clear. For this reason, the Seafood HACCP regulation allows sanitary controls for safety to be included in the HACCP plan. In most situations, processors should not complicate the HACCP plan with sanitation monitoring requirements that would be better served in sanitation control procedures. It would be difficult to assign and meet critical limits and corrective actions for certain sanitation controls and excessive sanitation monitoring assigned at CCP could burden the HACCP plan and detract attention from critical processing procedures. Sanitary conditions usually relate to the entire processing facility or an area, not just to a limited or specific processing step or CCP. In some instances, a seafood processing operation may not require a specific HACCP plan because the hazard analysis revealed no significant hazards, yet all processing firms must always monitor for sanitary conditions and practices.

Specific Sanitation Control Regulations

I-13. **Recommended SSOP Plan:**

"Each processor 'should' have and implement a written SSOP or similar document that is specific to each location where fish and fishery products are produced."

21 CFR, Part 123.11(a)
A written SSOP plan explaining the sanitation concerns, controls, in-plant procedures and monitoring requirements is recommended, but not required by the FDA seafood HACCP regulation. This course encourages development and use of written SSOP plans and offers sanitation guidelines.

I-14. **SSOP plans:**

- Describe the sanitation procedures to be used in the plant;
- Provide a schedule of these sanitation procedures;
- Provide a foundation to support a routine monitoring program;
- Encourage prior planning to ensure that corrections are taken when necessary;
- Identify trends and prevent recurrent problems;
- Ensure that everyone, from management to production workers, understands sanitation;
- Provide a consistent training tool for employees;
- Demonstrate commitment to buyers and inspectors; and
- Lead to improved sanitation practices and conditions in the plant.

I-15. **Sanitation Monitoring Program**

"Each processor ‘shall’ monitor the conditions and practices during processing with sufficient frequency to ensure, at a minimum, conformance with these conditions and practices specified in the [GMP] that are appropriate to the plant and food being processed."

21 CFR, Part 123.11(b)

In developing the seafood HACCP regulation, FDA used findings from previous regulatory inspections and consumer complaints to determine the most common sanitary problems. The results, based on inspections during 1991 - 1992 for nearly all domestic manufacturers in the FDA inventory of seafood establishments, indicated that some processing firms had problems with general sanitation conditions in the processing area. For example, processing firms:

- did not clean and sanitize their processing areas or equipment throughout the day’s production;

- had employees that were not following proper sanitation practices in processing, packaging, or finished product storage activities;

- lacked hand sanitizers in their processing area or had sanitizers that were not kept at proper sanitizing levels.

Intro-10
FDA combined their concerns into eight (8) areas of sanitation. This training program is built around these eight key areas of sanitation to be discussed in training as the EIGHT KEY SANITATION CONDITIONS.

I-16. FDA's Eight Key Sanitation Conditions

1. Safety of the water that comes in contact with food or food contact surfaces, or is used in the manufacture of ice;

2. Condition and cleanliness of food contact surfaces, including utensils, gloves, and outer garments;

3. Prevention of cross-contamination from insanitary objects to food, food packaging material, and other food contact surfaces, including utensils, gloves, and other outer garments, and from raw product to cooked product;

4. Maintenance of hand washing and sanitizing, and toilet facilities;

5. Protection of food, food packaging materials, and food contact surfaces from adulteration with lubricants, fuel, pesticides, cleaning compounds, sanitizing agents, condensate, and other chemical, physical, and biological contaminants;

6. Proper labeling, storage, and use of toxic compounds;

7. Control of employee health conditions that could result in the microbiological contamination of food, food packaging materials, and food contact surfaces; and

8. Exclusion of pests from the food plant.

Source: FCA Seafood HACCP Regulation, 21 CFR, Part 123.11
Monitoring will provide the required sanitation control records that, at a minimum, document the processor’s efforts in monitoring and correcting sanitary practices and conditions. The required monitoring information must be recorded at the time it is observed.

I-17. **Sanitation Control Records:**

“Each processor ‘shall’ maintain sanitation control records that, at a minimum, document the [sanitary] monitoring and corrections . . . “

21 CFR, Part 123.11(c)

I-18. **Sanitation Control Records:**

“Processing and other information ‘shall’ be entered on records at the time that it is observed.”

21 CFR, Part 123.9(a) (4)

When sanitation problems are detected as a result of sanitation monitoring, corrections must be taken in a timely manner to ensure compliance with the GMP. Sanitation monitoring and corrections must be documented. These records can be reviewed by inspectors, but are not required to be reviewed by plant personnel. This is in contrast with HACCP records which must be reviewed by plant personnel. Likewise, CCP are subject to mandatory verifications, whereas sanitation controls are not. Although not required by the HACCP rule, reviews and verifications are strongly encouraged in order to support the sanitation control procedures.

I-19. **Sanitation Corrections:**

“Processors ‘shall’ correct in a timely manner, those [sanitary] conditions and practices that are not met.”

21 CFR, Part 123.11(b) (8)
I-20. **Sanitation Control and Correction Records, must include:**

1. Name and location of the processor;
2. Date and time of the activity recorded; and
3. Signature or initials of the person performing the monitoring operation.

21 CFR, Part 123.9(a)

All sanitation monitoring and corrections, and HACCP records ‘shall’ be available for official review and copying at reasonable times. Likewise, the sanitation control records shall be retained at the processing facility for at least one year after the date they were prepared in the case of refrigerated products and for at least two years after the date they were prepared in the case of frozen, preserved, or shelf-stable products.

I-21. **Sanitation Control Records retained—**

... at least 1 year for refrigerated products, and

... at least 2 years for frozen, preserved or shelf-stable products

21 CFR, Part 123.9(b)

**Sanitation Monitoring**

There is no mandatory or specified method or form for routine use in sanitation monitoring. HACCP does, however, require processors to consider all of the eight key sanitation conditions specified in the regulation (I-16). A daily clipboard check sheet is one common approach offered by this course. Other approaches can involve automated recording, electronic records, or other innovative approaches. Monitoring should be customized for the particular processing facility and operation. The success of the monitoring method does not depend on the approach, but on the evidence it yields to reflect routine and appropriate sanitation practices.

The parts that are common to most sanitation monitoring forms are: 1) a specific sanitation condition or practice that is to be monitored; 2) space to record observations or measurements of the condition being monitored at the prescribed frequency for monitoring; and 3) space to document any necessary corrections.
I-22. Common Features for Sanitation Monitoring Forms:

1. Specific sanitation conditions or practices to be monitored;

2. Space to record observations and measurements at the prescribed frequency; and


In most cases, the records can be marks for “Satisfactory” or “Unsatisfactory” (S/U), “Pass” or “Fail” (P/F), “Yes” or “No” (Y/N), or ✓ and ✗ to denote the sanitary condition or practice. However, more detail is necessary to record ‘actual values’ or measurements when necessary (e.g., sanitizer concentrations, time of observations, etc.).

The following monitoring forms are provided as examples that could be used in different processing situations (I-23 through I-27). A daily sanitation record form (I-23) taken from the Seafood HACCP Alliance ‘Encore’ HACCP course is provided to illustrate a variety of considerations in designing a monitoring record. This form addresses both raw (line 1) and ready-to-eat (line 2) seafoods. Note, that for some areas of sanitation the frequency for monitoring is more often for the ready-to-eat line. This form distinguishes a “Pre-Op” inspection from an inspection preformed at the actual “Start” time, while encouraging certain checks at 4-hour intervals or after operations are completed ("Post-Op"). Actual values are recorded for observation times and sanitizer concentrations. Likewise, the monthly sanitation monitoring form (I-24) taken from the “Encore” course can accompany the daily forms. These forms will be used in the following chapters to progressively complete an example sanitation control record.

In contrast, Forms I-25 and I-26 provide a multi-day log that details monitoring of specific areas of sanitation in a processing plant. In most processing operations all of the eight key sanitation conditions are relevant. In some instances, usually for operations with limited processing and handling steps (i.e., warehouses), some of the key sanitation conditions may not be applicable. Form I-27 is an example of a simple daily sanitation record to reflect the character and limited operations associated with warehousing frozen seafoods which involve no manufacturing or reprocessing.
# DAILY SANITATION CONTROL RECORD

**Report Date:** ______________________  **Firm Name:** ______________________
**Line 1: Raw Seafood (not ready-to-eat)**  **Firm Address:** ______________________
**Line 2: Ready-to-eat**

<table>
<thead>
<tr>
<th>Sanitation Area and Goal</th>
<th>Pre-Op Time</th>
<th>Start Time</th>
<th>4 Hour Time</th>
<th>8 Hour Time</th>
<th>Post-Op Time</th>
<th>Comments and Corrections</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Safety of Water</td>
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<td>(See Monthly Sanitation Control Record)</td>
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<td>◆ Back Siphonage-Hose (S/U)</td>
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<td>2) Condition and Cleanliness of Food Contact Surfaces</td>
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<td></td>
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<tr>
<td>(See Monthly Sanitation Control Record)</td>
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<tr>
<td>◆ Equipment cleaned and sanitized</td>
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<td>Line 1: (S/U)</td>
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<td>Line 2: (S/U)</td>
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<td>◆ Sanitizer Strength</td>
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<tr>
<td>Sanitizer Type: ___________________</td>
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<tr>
<td>Strength:_________ ppm</td>
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<td>Line 1: (ppm)</td>
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<tr>
<td>Line 2: (ppm)</td>
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<tr>
<td>◆ Gloves and aprons clean and in good repair</td>
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<tr>
<td>Line 1: (S/U)</td>
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<tr>
<td>Line 2: (S/U)</td>
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<tr>
<td>3) Prevention of Cross-Contamination</td>
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<tr>
<td>(See Monthly Sanitation Control Record)</td>
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<tr>
<td>◆ Hands, gloves, equipment, and utensils washed/sanitized after contact with unsanitary objects (S/U)</td>
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<tr>
<td>◆ Employees working on raw products, wash and sanitize hands/ gloves/outerwear before working with cooked products (S/U)</td>
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<td></td>
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<tr>
<td>◆ Unpackaged cooked products separated from raw products (S/U)</td>
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</tr>
</tbody>
</table>

*S = Satisfactory / U = Unsatisfactory*
### Daily Sanitation Control Record

<table>
<thead>
<tr>
<th>Sanitation Area and Goal</th>
<th>Pre-Op Time:</th>
<th>Start Time:</th>
<th>4 Hour Time:</th>
<th>8 Hour Time:</th>
<th>Post-Op Time:</th>
<th>Comments and Corrections</th>
</tr>
</thead>
<tbody>
<tr>
<td>4) Maintenance of Hand-washing, Hand-sanitizing, and Toilet Facilities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Hand-washing and hand-sanitizing stations adequate</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Hand-washing station</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Line 1: (S/U)</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Line 2: (S/U)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Hand-sanitizing station</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sanitizer Type: ____________</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Strength: ______ ppm</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line 2: (ppm)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Toilets clean, properly functioning, and adequately supplied (S/U)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5) Protection from Adulterants and 6) Labeling, Storage, and Use of Toxic Compounds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Product protected from contamination (S/U)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Cleaning compounds, lubricants, and pesticides labeled and stored properly (S/U)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7) Employee Health Conditions</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Employees do not show signs of medical problems (S/U)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8) Exclusion of Pests</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Pests excluded from processing area (S/U)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

S = Satisfactory / U = Unsatisfactory

Signature or initials: ____________ Date: ____________
## Monthly Sanitation Control Record

**Report Date:** ____________  
**Firm Name:** ____________

**Firm Address:** ____________

<table>
<thead>
<tr>
<th>Sanitation Area</th>
<th>Decision</th>
<th>Comments/ Corrections</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1) Safety of Water</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Safe and sanitary source (S/U) (annual)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- No cross-connections in hard plumbing (S/U)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2) Condition and Cleanliness of Food Contact Surfaces</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Processing equipment and utensils in suitable condition (S/U)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>3) Prevention of Cross-contamination</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Physical conditions of plant and layout equipment (S/U)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

S = Satisfactory / U = Unsatisfactory

Additional Comments:

Signature or initials: ________
I-25. Daily Sanitation Control Record for a specific location in the processing plant.

**DAILY SANITATION CONTROL RECORD**

*ABC Shrimp Company*
*Anywhere, USA*

<table>
<thead>
<tr>
<th>Date</th>
<th>Time of Check</th>
<th>Cleanliness of Area (1) (P/F)</th>
<th>Facilities Functioning Properly (2) (P/F)</th>
<th>Facilities Adequately Supplied (3) (P/F)</th>
<th>Comments/Corrections</th>
<th>Check by:</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/22/99</td>
<td>5:50 am</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td></td>
<td>Mr. A</td>
</tr>
<tr>
<td>3/23/99</td>
<td>5:35 am</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td></td>
<td>Mr. A</td>
</tr>
<tr>
<td>3/24/99</td>
<td>5:55 am</td>
<td>P</td>
<td>P</td>
<td>F</td>
<td>No soap in dispenser; filled with soap</td>
<td>Mr. A</td>
</tr>
<tr>
<td>3/25/99</td>
<td>6:03 am</td>
<td>P</td>
<td>F</td>
<td>P</td>
<td>Drain on left sink clogged; turned off water to sink to prevent use; called maintenance</td>
<td>Mr. A</td>
</tr>
<tr>
<td>3/25/99</td>
<td>10:15 am</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>Drain on left sink unclogged</td>
<td>Mr. A</td>
</tr>
<tr>
<td>3/26/99</td>
<td>5:48 am</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td></td>
<td>Mr. A</td>
</tr>
</tbody>
</table>

P = Pass / F = Fail

(1) Cleanliness of sinks, floors, stalls, trash removed.  
(2) Hot water available, drains functioning, toilets functioning.  
(3) Soap, paper towels, and toilet paper provided.
I-26. Monitoring for a specific location in the plant.

**SANITATION CONTROL RECORD**

*Any Seafood Company*

*Anywhere, USA*

### Condition of Chemical Storage Area

<table>
<thead>
<tr>
<th>Date</th>
<th>Time of Check</th>
<th>Storage Area Secure? (Y/N)</th>
<th>Chemical Containers Closed? (Y/N)</th>
<th>Chemicals Properly Labeled? (Y/N)</th>
<th>Clear of Chemical Spillage? (Y/N)</th>
<th>Comments/Corrections</th>
<th>Check by:</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/22/99</td>
<td>8:05 am</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td>SAM</td>
</tr>
<tr>
<td>3/23/99</td>
<td>8:10 am</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Gate unlocked; locked gate: notified sanitation supervisor</td>
<td>SAM</td>
</tr>
<tr>
<td>3/24/99</td>
<td>7:58 am</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td>SAM</td>
</tr>
<tr>
<td>3/25/99</td>
<td>8:08 am</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>Lid off drain of de-icer compound: replace lid and labeled: notified sanitation supervisor</td>
<td>SAM</td>
</tr>
<tr>
<td>3/26/99</td>
<td>7:50 am</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Sanitizer dripping from board: tighten value: cleaned up spill</td>
<td>SAM</td>
</tr>
</tbody>
</table>

Y = Yes; N = No

Intro-19
**DAILY SANITATION RECORD**

Name: Any Frozen Seafood Storage Warehouse
Address: Anywhere
City: Metropolis, USA
Report Date & Time: 4/1/99
Completed By: BSF

<table>
<thead>
<tr>
<th>Sanitation Condition</th>
<th>Comments and Corrections</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receiving and staging areas cleaned and sanitized.*</td>
<td>✓</td>
</tr>
<tr>
<td>Raw products and cooked products stored in designated areas or are covered to prevent cross contamination in refrigerated storage.*</td>
<td>✓</td>
</tr>
<tr>
<td>Toilets and hand washing sinks are clean, adequately supplied, and functioning properly.*</td>
<td>X Broken toilet lid; replaced with new lid.</td>
</tr>
<tr>
<td>Cleaning compounds, lubricants and pesticides are properly labeled and stored.</td>
<td>✓</td>
</tr>
<tr>
<td>Employees do not show signs of medical problems.*</td>
<td>✓</td>
</tr>
<tr>
<td>Pests excluded from product storage area.</td>
<td>X Droppings from rodents in dry storage area; cleaned area and re-baited.</td>
</tr>
</tbody>
</table>

✓ = Pass  
X = Fail  

* These items may not be applicable in all situations, particularly those where the product is not exposed.
References

For additional information on sanitation procedures, regulations and HACCP:


HACCP Alliance website information:
  http://seafood.ucdavis/haccp