

## **P1 CONTROL PROGRAMS**

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**Control programs are developed and updated as required. Each program outlines effective food hygiene policies and procedures to protect the safety and suitability of food. Each program outlines the roles, responsibilities and instructions for each operational area.**

Good Manufacturing Practices (GMPs) are the basic, universal conditions and procedures within the processing establishment that create conditions favourable for the production of safe food. They are the sum of all the programs/policies, practices and procedures that must be applied to reduce contamination risk during food processing.

**What Is Required?** Every facility should develop **written** policies and procedures for:

- Each specific operational area of:
  - **O1** personnel practices
  - **O2** shipping, receiving, handling and storage
  - **O3** sanitation
  - **O4** equipment maintenance
  - **O5** pest control
  - **O6** recall
  - **O7** water safety
- All food safety–related employee training, as well as specialized technical training for areas such as sanitation, calibration, etc.

Training is addressed in the next section of this Guidebook.

Each written control program should describe the GMP programs/policies and procedures necessary to protect the safety and suitability of food. As an added benefit, detailed procedural and training descriptions help workers to quickly grasp the details of new or temporary assignments by following the written “recipe.”

**Operational Controls** Operational control written programs should meet required GMP standards and be suitable for your operations. Those that aren’t should be revised until they are. Programs should also include a monitoring component to ensure that the required GMP standards are being met.

## Control Programs

These written programs are sometimes referred to as Standard Operating Procedures (SOPs) or Sanitation Standard Operating Procedures (SSOPs). An example of each follows in this section.

Records offer written proof both that GMP programs are being followed and those operational processes are under control, thus reducing the probability of contamination. They are your “due diligence.” Records also create an investigative mechanism to determine the cause (e.g., the program has not been followed) or to rule out the cause (e.g., the program has been followed) of food safety problems, should they occur.

**Environmental Controls** Environmental controls outline requirements of the establishment location, design and equipment necessary to create a physical setting conducive to the production of safe food. Because they are not related to people or the actions of people, they cannot be addressed by a written procedural program.

Redesign, repairs or replacement of buildings and/or equipment can generally correct deficiencies in environmental controls. In the absence of long-term solutions, interim controls may be used to control a hazard for the short term. For example, an employee may use a squeegee to eliminate pooled water from a poorly drained area. This short-term solution may eventually prove to be less effective and more costly than repairing the floor.

**Standard Operating Procedures (SOPs)** Standard Operating Procedures (SOPs) are written descriptions of specific tasks in your food processing facility that may or may not be related to food safety. Each SOP should include GMP criteria.

In clear, concise and complete terms, a SOP should address:

- The purpose of a task
- Its frequency
- The job position assigned to perform the task
- The equipment and chemicals required to perform the task
- A step-by-step description of the procedure that includes all the steps involved, their sequence and the corrective action to be taken if pre-determined standards are not achieved
- The records required to document procedures, monitoring and any corrective action taken.

## Control Programs

It is important that the procedure described makes it easy to perform the task correctly. If the procedure is difficult to understand, the likelihood that the task will be consistently done well is significantly reduced.

Too often, SOPs are written by “experts” who know how the procedure should be done but fail to consult with those supervising or performing the procedure to discover how the procedure is currently being performed and the capabilities of the existing system and its workers. Therefore, an ideal SOP preparation team includes technical experts, supervisory staff and the people who actually do the work. Together, this team should be able to create a plan that is compatible with other plant operations, is workable and meets food safety requirements.

Programs should not be static. As conditions change, as more efficient procedures are discovered, as the equipment and materials used change, as formulations are altered, etc., the SOP must reflect these improvements as the “current best approach.” For this reason, the SOP team should meet on a regular basis to review and update the SOP.

A single SOP need not cover every aspect of each operation. It may be divided into components to make it more manageable. For example, while personnel practices, as a group, relate to personal hygiene, a single SOP covering all areas of personal hygiene might be difficult for workers to understand and follow.

Every SOP should contain enough detail that an employee will know exactly what to do simply by following the written instructions. Each SOP should answer the questions, who? what? where? when? and why?

**SOP Example** This is an example of a handwashing SOP.

Policy: *[describes the standard]*

All those handling food, ingredients, packaging materials and/or touching food contact surfaces must wash their hands and put on clean gloves before beginning their assigned tasks. There will be no exceptions.

Responsibility: *[indicates who is responsible for performing the procedure]*

## Control Programs

All those handling food, ingredients, packaging materials and/or touching food contact surfaces.

Frequency: *[indicates how often the procedure will be performed]*

Hands must always be washed and clean gloves put on:

- Immediately before handling food, ingredients, packaging materials and/or touching food contact surfaces
- After using the toilet
- After coughing, sneezing, blowing or wiping the nose, or touching hair or the face
- After each absence from the work station for coffee breaks and eating
- After handling incompatible food products, raw materials, or potentially hazardous materials such as garbage or cleaning chemicals
- After picking up objects off the floor
- Any other time hands become soiled or contaminated.

Procedure: *[describes the specific procedures required to meet the standard]*

- Roll up sleeves far enough so that wrists are exposed and sleeves do not get wet during washing.
- Wet hands and wrists under warm water (38–43°C).
- Apply 3 ml of antimicrobial soap.
- Scrub hands palm to palm. Scrub in between and around fingers. Scrub back of each hand with palm of other hand. Scrub fingertips of each hand in opposite palm. Scrub each hand clasped in opposite hand. Scrub each wrist clasped in opposite hand. Scrubbing must last for a minimum of 15 seconds.
- Rinse hands and wrists thoroughly under warm running water.
- Dry hands well with a single-use paper towel.
- Turn off water tap using the paper towel.
- Put on gloves.
- If gloves have been worn previously, they must also be washed before beginning or returning to their assigned tasks.

Monitoring: *[indicates who is responsible for ensuring that the standards are met]*

## Control Programs

Supervisors will monitor hand and glove cleanliness.

Corrective Actions: *[indicates action required to meet standards if they are not met initially]*

When hands and/or gloves do not meet policy criteria, the responsible supervisor will direct the offender to wash again. The supervisor will perform a follow-up inspection.

Corrective actions will be recorded on the Employee Sanitation Report.

Applicable Records: *[a record of what took place. "If you don't write it down, it didn't happen."]*

Employee Sanitation Report (fictional, for purposes of this example)

### **Sanitation Standard Operating Procedures (SSOPs)**

SOPs related to sanitation are called Sanitation Standard Operating Procedures (SSOPs). An SSOP should be specific enough that the sanitation crew can complete each cleaning and sanitation activity simply by following the written instructions. This means that cleaning and sanitation activities will be carried out at the right time and in the right place by using the proper procedures with the right chemicals at the right concentrations.

SSOPs should:

- Identify the building areas, equipment, and utensils to be cleaned and sanitized
- Indicate the frequency of cleaning and sanitation for each building area, each piece of equipment and each utensil
- Prescribe the procedures for cleaning and sanitizing
- Specify the chemicals to be used, their concentrations, and the temperature of the cleaning or sanitizing solution
- Designate the job position responsible for each cleaning and/or sanitizing task
- Set a procedure to verify that the cleaning and sanitizing has been effective
- Indicate the record keeping required.

## Control Programs

**SSOP Example** This is an example of a washroom SSOP.

Policy: *[describes the area and the expected standard]*

All washrooms have an adequate supply of hot and cold potable running water, soap dispensers, liquid soap, single-use paper towels and cleanable garbage containers. Walls, floors, ceilings and bathroom equipment are clean and sanitary. Floors are free of standing water. Sanitary facilities, exhaust fans, floor drains, soap dispensers, doors and other equipment are in working order.

Signs (in English, French and Spanish) directing food handlers to wash their hands are posted, along with signs indicating proper handwashing technique.

Frequency: *[indicates how often the procedure will be performed]*

Food handler washrooms will be cleaned after each employee break (after workday begins, after mid-morning break, after lunch break, after mid-afternoon break, and after food handlers have left the facility following their shift).

Procedure: *[describes the specific procedures required to meet the standard]*

Washrooms will be visually inspected to ensure there are adequate supplies of liquid soap and single-use paper towels, that there is an adequate supply of hot and cold potable running water, that all equipment is in working order and otherwise in good repair, and that handwashing signs are posted and readable. Supplies will be refilled, as required.

Sanitary facilities, including toilets, urinals, sinks, etc., in food handler washrooms will be cleaned and sanitized at least twice per day using cleaning and sanitizing agents designated by the Sanitation Supervisor. Cleaning and sanitation may be more frequent, as determined by the Sanitation Supervisor.

Garbage containers will be emptied and cleaned after each break.

Walls in food handler washrooms will be cleaned and sanitized once per day or more frequently, if necessary.

## Control Programs

Required repairs to equipment or structures will be noted in the Daily Sanitation Log and a written Work Order forwarded to the Maintenance Department immediately.

Chemicals: *[the chemicals used, the concentrations, the temperatures]*

- Cleaner XXX mixed at 1 L of chemical per 20 L of 25–40°C water
- Sanitizer YYY mixed at 500 g of chemical per 40 L of 25–35°C water.

The times, activities and chemical agents used will be recorded in the Daily Sanitation Log.

Responsibility: *[indicates job position responsible for performing each task]*

A member or members of the Sanitation Department designated by the Sanitation Supervisor will be responsible for performing cleaning and sanitation functions in all food handler washrooms.

Monitoring: *[indicates who is responsible for ensuring that the standards are met]*

The Sanitation Supervisor will inspect each washroom three times per day.

If policy criteria are not met, the Sanitation Supervisor will direct a member of the Sanitation Department as to the corrective actions to be undertaken to bring the washroom(s) up to required standard.

The Sanitation Supervisor will perform a follow-up inspection.

Corrective actions will be recorded on the Daily Sanitation Report.

Applicable Records: *[a record of what took place. “If you don’t write it down, it didn’t happen.”]*

Daily Sanitation Report (fictional, for purposes of this example)

### **Master Sanitation Schedule**

To ensure that no tasks are missed, a Master Sanitation Schedule outlines the frequency with which each sanitation task is performed (e.g., daily, weekly, monthly, end of season).

## Control Programs

**Records** To verify that cleaning and sanitation activities have been carried out as described, monitor activities and record results. If monitoring discovers deficiencies between the written SSOP and its implementation, take the predetermined corrective action and record the results. If necessary, alter the procedure or retrain staff to ensure that the deviation does not happen again.