

01C02 Procedure

You should perform the 01C02 the same way as you conduct the 01B02, though this procedure is conducted during operations. Again, you should first review the SSOP to become familiar with all the operational sanitation procedures in it.

You should verify that the establishment is meeting the SSOP regulatory requirements for operational sanitation by:

- Inspecting one or more areas of the establishment to ensure procedures are effectively preventing direct contamination or adulteration of product,
- Observing the establishment perform its monitoring procedures,
- Comparing your findings to what the establishment has documented.

Before going into the establishment to assess operational sanitation in one or more areas by performing the 01C02 procedure, you should:

- Select the area or areas of the plant where you will perform the inspection. In processing departments, select one or more rooms or departments of the establishment. If you select a part of the establishment where ready-to-eat product is prepared as one of the departments where you will perform this procedure, you should start in that part of the plant first to prevent spreading microorganisms from the raw product departments of the plant.
- Have a good flashlight.
- Have a pen or pencil.
- Have U.S. Rejected/U.S. Retained tags and some means (tape, string, rubber bands) of affixing these tags to equipment, departments, product, etc.
- Have a notepad to record your operational findings.

Product and product contact surfaces must be kept free of contamination during operation. Other areas that are not direct contact surfaces can also be a source of product contamination and should be inspected. For example, condensation, peeling paint, and scaling rust from overheads where products are processed, handled, or stored can contaminate products. You should inspect the environment in those areas you have selected to verify the products are produced safely. You have the responsibility to verify that the establishment has met all operational sanitation regulatory requirements.

There are three parts to the 01C02 procedure: 1) observing the establishment conducting its monitoring, 2) performing an inspection of some of the

establishment's facilities, equipment, utensils, product handling practices, etc. to verify sanitary conditions (hands-on), and 3) comparing your findings with the plant records. You should verify that the establishment is implementing the procedures in the SSOP. You should also verify that the establishment is monitoring the effectiveness of those procedures in preventing direct contamination or adulteration of product.

When you are performing 01C02, you should observe equipment, employees, and facilities to ensure that product contamination is not occurring during operation. For example, employees might contact contaminated surfaces with their hands and clothing and return to handling product without first cleaning their hands or changing their outer clothing. If you observe contaminated direct contact surfaces or contaminated product, there is SSOP noncompliance whether there is a procedure written in the SSOP to cover that situation or not.

When you go to an area of the establishment to perform the 01C02 procedure, you should inspect direct contact surfaces of equipment, facilities, and utensils. When possible, you should also observe the establishment conducting its monitoring activity. Some establishments conduct the monitoring of operational sanitation once or twice daily; therefore it might be difficult to observe this activity. When you have completed your assessment of the sanitation in one or more areas of the plant, you should compare your findings with the establishment's sanitation findings. If the records are not complete at the time you have completed this procedure, you might ask the establishment if it has conducted monitoring and what observations were made. We will now discuss the SSOP regulatory requirements.