

Example of the GAD Thought Process

Regulation

§416.2(g) (5) Any water that has never contained human waste and that is free of pathogenic organisms may be used in edible and inedible product areas, provided it does not contact edible product. For example, such reuse water may be used to move heavy solids, to flush the bottom of open evisceration troughs, or to wash antemortem areas, livestock pens, trucks, poultry cages, picker aprons, picking room floors, and similar areas within the establishment.

Establishment's Responsibilities

The establishment can use nonpotable water or reuse water for any purpose in edible or inedible product areas provided it ensures that the water:

- Has never contained human waste. Plant must not reuse water from toilet and urinal lines.
- Has been conditioned (treated) to be **free of pathogenic organisms**. Reuse water must be free of pathogenic organisms to prevent their introduction into and spread throughout the plant.
- **Does not** contact edible product. Reuse water might contain coliform bacteria, chemicals, or physical contaminants, so it cannot contact edible product.

Verifying Compliance with This Regulation

You should examine and assess the plant's use of nonpotable water in one or more areas of the plant. You should **verify** that nonpotable water used in edible and inedible product areas is free of pathogens and does not come into contact with edible product.

1. You May Gather Needed Information by Seeking the Answer to the Following Questions.

Is the nonpotable water maintained free of pathogenic organisms?

Does the nonpotable water used in edible product departments come in contact with edible product?

The following list of observations may assist you in answering these questions. You may perform additional observations.

- Look for microbiological or chemical analyses (e.g., chlorine or other additive concentration) documentation that indicate that the reused water is free of pathogens.
- Look for nonpotable water (e.g., from a river or lake) used in edible or inedible product areas that might not be free of pathogenic organisms.
- Look for nonpotable water contacting edible product or product components.

2. Assess the Information You Gathered.

When you find conditions like the examples listed above, you should assess all of the information related to your observation and then make a determination whether the establishment is meeting the regulatory requirements. You should use good judgment in making these determinations and might seek answers to the following questions in order to determine if there is noncompliance.

Are the conditions you observed creating an insanitary condition?

If you find any condition relating to the plant's pathogen free nonpotable water use that is creating an insanitary condition, there is noncompliance with the requirements of 416.2(g)(5) and you should document that noncompliance on an NR. If the conditions you observed are not creating an insanitary condition or adulteration of product, there is no noncompliance.

Are the conditions you observed contaminating product?

If product is contaminated, you might need to make a further assessment by seeking answers to more questions. Is there a food safety hazard associated with the contaminated product? If there is no food safety hazard associated with the product, you should document the noncompliance using the SSOP procedure code. If there is a food safety hazard associated with the contaminated product, you should document the noncompliance using the appropriate HACCP procedure code.

Examples of the failure to meet the requirements for this regulation are:

- Reusing chemically treated water from employee restrooms to clean antemortem pens.
- Reusing water that has never contained human waste, is free of pathogens, but has not been subject to measures that reduce physical, chemical, and microbial contamination to rinse raw vegetables to be used in meat food products.