IFSH Spout Audit Checklist
Review

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SCS Background on Sprouts

- SCS is both a lab and certifying agency for Agriculture and Food since 1990.
- Accredited ISO 65, SQF, BRC, Global GAP
- Co developed ISGA Certification for Spouts in 1996.
- Participated on both white papers on spout safety in 1998.
- Participate in United Produce Tech.
Auditing Format

- Provide Audit Checklist in advance of onsite visit and discussed basic requirements.
- Conducted Document Review Onsite
- Conducted Operational Review and interviewed operational personnel
- Conducted a posts audit interview.
Prerequisite Food Safety Items

- FDA, Reducing Microbial Food Safety Hazards in Sprouted Seeds.
- Sampling and Microbial Testing of Spent Irrigation Water During Sprout Production.
- Good Manufacturing Practices (CFR 21.110)
- HACCP as per AFDO or IHA
- Good Agricultural Practices (seeds)
- Food Defense Program
Specific Requirements

- Seed Suppliers Have Validated GAP program.
- Seed Sanitation step (approved and validated)
- Spent Irrigation Water sampling & testing as per Document, plus Hold and Release.
- Recycled water treated and validated.
- Finished Product Held at 40F (MFCODE)
- Soil tested on soil grown sprouts.
Audit Check list, Documents and Records

• Review of HACCP plan.
  – Policy
  – Flow Process
  – Description of HACCP personnel
  – CCP Management Process
  – Corrective Actions
  – Verification
Audit Check List, Documents and Records

• GMP Program
  – SOPs covering sanitation of building, trucks, grounds
  – SOP covering sanitation of food contact surfaces.
  – SOP of Pest control
  – SOP of Personal Hygiene
  – SOP for Controls of Production
  – SOP for Raw Materials
Audit Check List, Documents and Records

- Control of Sprouting Operations
  - Seed Sanitation Process
  - Spout Production
  - Post harvest washing, dehuling & Dewatering
  - Packing and Labeling
  - Spent Irrigation water testing for pathogens
  - Soil Grown Sprouts.
  - Storage and Distribution
Audit Check List, Documents and Records

• Traceback and Recalls
• Food Facility Defense
• Employee Training.
Audit Check List, Documentation

- Asks for parts of HACCP Program except
  - HACCP Team, Hazard Analysis Worksheet,
- Needs to bring up Chemical Hazards (especially since they have strong oxidizers)
- Need to request for Pre-operational Inspection.
- Under Pest control, Copies of the pesticide labels, and MSDS sheets must be available.
- Under Cleaning and Sanitizing, Swabs of food contact surface would be primarily for APC or coliform bacteria (not pathogens) for GMP.
Audit Check list, Documentation

• **Seed Sanitation and treatment**
  – What if there is no seed sanitation (Auto Failure)
  – What if there deviations from list of treatments.

• **Spent Irrigation Water Testing,**
  – must specify that the samples must be tested within 24 hours.
  – Labs use AOAC approved test methods.
  – Is PCR testing now allowed.

• **Storage Temperatures (Follow Hazardous Food Guidance from Model Food Code).**
Audit Check List, Documentation

• Soil Grown Products
  – Policy describes soil not being transferred to other growing areas, and worker control, but does not discuss finished product cross contamination in packing areas.
  – Compost must show controls of pathogens.
Audit Check List, Onsite Inspection

- Local Records
- GMP Compliance
  - Spout Production Areas and Equipment design
  - Cleaning and Sanitation of Areas
  - Pest Control
  - Waste Management
  - Personnel Hygiene
  - Control of General Operations (design and flow)
Audit Check List, Onsite Inspection cont.

- Control of Spout Operations
  - Execution of seed receiving & storage
  - Seed sanitization processes
  - Sprout Production
  - Packing and Labeling
  - Storage and Distribution
  - Spent Irrigation Water Sampling and Testing.

- Includes results management and follow up
Audit Check List, Onsite Inspection cont.

- Traceback and Recalls
- Food and Facility Defense
- Training.
List of Automatic Failures

• Documents and Records
  – No treatment of Recycled water
  – Not having a Hold and Release program
  – Not having a sampling verification process
  – Not testing spent irrigation water for pathogens
  – Not having a lab that is using approved methods
List of Automatic Failures

• Onsite Inspections
  – Not verifying that water used is potable
  – Not having invoices of sanitizing chemicals used in seed sanitation.
  – Not having lot codes or sell by dates on labels.
  – Not collecting and testing spent irrigation water on each production batch.
List of Automatic Failures

- Onsite Inspection continued
  - If positive or presumptive positive, no disposition records of that lot.
  - Not maintaining 2 years of hold and release records.
  - Lab does not confirm they performed the test.
  - Soil not being tested for pathogens, or controls not in place at supplier
  - Not being able to account for product being tested.
Audit Administration Issues

- Desk Audit Option (like SQF).
- How much support material is pre-sent.
- Frequency of Audit (Annual or Quarterly)
- Partial Scoring not included.
- Corrective action follow up, with documents and photos or onsite
Questions and Discussion
The End

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SCS