

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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