



Sanitation Monitoring for Seafood Processors

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Seafood processors must practice strict sanitary procedures to reduce contamination sources, thus providing consumers with high quality, wholesome foods. A routine sanitation monitoring program in place demonstrates that processors are actively maintaining a sanitary environment during processing. Documenting the results of these sanitation conditions demonstrate compliance with existing federal, state and local requirements. The following are answers to frequently asked questions related to the monitoring of the 8 key sanitation areas required for the sale of seafood products under the Seafood HACCP regulation.

Frequently Asked Questions

What things must I monitor if I use well water as the water supply for my food processing plant?



In Virginia, shellfish processing operations using private well water must sample the water supply prior to use, every six (6) months while water supply is being used and after the water supply has been repaired or disinfected based on the Virginia Department of Health (VDH) Division of Shellfish Sanitation requirements. Firms under the Virginia Department of Agriculture and Consumer Services (VDACS) inspection will be required to test their well water supply once a year.

Will a monthly water bill be sufficient for monitoring the safety of my municipal water supply?

Yes. The municipal water bill is sufficient to show that the water supply is safe. You must also ensure that the water is kept safe by preventing contamination once it reaches your processing plant. Monitoring should also include that backflow prevention devices such as air gaps, vacuum breakers and check valves are used on hose bibs, water inlets and at points in the water system that may present a possibility of back siphonage or back flow.

What about ice, must I monitor it too?

Yes. Ice is considered a food and must be treated as such and monitored frequently. Monitor that ice is made with potable water and stored in clean bins. Also monitor that shovels used for ice are clean, and stored off the floor and maintained in good condition, i.e. free from pits, chips, or cracks. Shovels and scoops used for ice should not be used for any other purpose.

What are the steps for cleaning food contact surfaces and equipment?

A daily cleaning schedule is essential to reduce the presence of bacteria, such as Listeria, in the plant environment. A daily cleaning schedule should include the following sequential steps:

1. Dry clean or scrape the surface to remove food debris. Follow with a pre-rinse to remove small food particles and to wet the surface in preparation for the application of detergent.
2. Apply a detergent that is acceptable for the food contact surfaces and that will work with the type of soil and the method of application. Use the water temperature recommended for the detergent.
3. Rinse surfaces with water at the recommended temperature to remove all detergent residues.
4. Sanitize with the proper sanitizer and concentration recommended on the label.
5. Allow the surfaces to air dry and make sure that the surfaces and equipment are in a position they can drip rather than hold water.

Avoid contamination of the cleaned and sanitized food contact surfaces by following a top to bottom cleaning approach, using low-pressure water spray. Confirm adequate cleanliness and sanitization of equipment and food contact surfaces at the beginning of the production day and/or after cleaning.



What are the disadvantages of using high-pressure, high volume cleaning equipment?

High-pressure, high-volume equipment is not recommended for cleaning due to the increased potential from splash and contamination of the cleaned surfaces and equipment. Also, the high volume of fog created can cause increased condensation in the plant environment thus posing a potential for contamination of the cleaned surfaces. Low-pressure cleaning equipment is recommended because it reduces splash and

environment fogging during the cleaning procedures.

How much sanitizer should I apply to food contact surfaces of equipment and utensils?

Table 1 lists common sanitizers and the proper concentration to be used for sanitizing of food contact surfaces such as equipment and utensils. If sanitizers are used in excess of the recommended concentration, sanitizer residue will be left on the surface potentially contaminating food placed on it. It is important that the concentrations listed in Table 1 are monitored using the specific test kit for the type of sanitizer you are using.

Table 1. Sanitizer concentrations commonly used in food plants

Can a prepared hand sanitizer solution last all day?

No. Some sanitizers dissipate and may lose their effectiveness over time and continual use. Monitor these solutions with the appropriate strips and change frequently during the day to ensure the proper strength.

How can I ensure that employees are following sanitary practices?

Since employees are a major source of food contamination, focus on training

Table 1. Sanitizer concentrations commonly used in food plants	
Sanitizer type	Concentration to use in food contact surfaces
Chlorine	100-200* ppm
Iodine	25* ppm
Quats	200* ppm
*do not exceed this maximum concentration.	

and education, and monitoring during their work shift to encourage good sanitary habits and prevent product contamination. Monitor that they are coming to work clean, with clean clothes, removing jewelry, wearing garments that cover body hair, and only working when they are in good health. Smoking, eating, and drinking should only be allowed in designated areas and away from processing areas. Monitor that they are washing their hands frequently, such as prior to returning to their work areas, and at any time their hands become soiled, i.e. picking up trash or touching their face. Pay close attention to those employees that move between raw and ready-to-eat food (RTE) areas. Cross contamination between these two areas can be prevented by designating employees to work in specific areas, designating separate areas for handling raw and RTE products, and/or using color-coordinating equipment and utensils.

What should I do when an employee is observed not following sanitary practices?

Correct deficient behaviors at the time it is observed and evaluate the product for potential contamination and disposition. Take this opportunity to retrain and reemphasize your company policy and the importance of following sanitary practices for the safety of the product.



Is hand washing necessary if gloves are used when handling foods?

Yes. Hand washing is necessary *before* putting on gloves. Gloves act as a “barrier” to protect the food from contaminated hands. If the hands are dirty before putting on gloves, the gloves will be contaminated, therefore contaminating the food. Gloves are not a substitute for handwashing.

When it is recommended to change disposable gloves?

Disposable gloves should be changed after a prolonged period of use, whenever they are torn or when switching tasks such as bathroom breaks or taking out the trash. Employees should wash their hands before putting on a new pair of gloves. Monitor the use of gloves throughout the day and correct any employees observed carrying out tasks that can contaminate foods by the misuse of gloves.

Can I use hand sanitizers instead of washing my hands?

No. Washing hands using soap and warm water and proper hand washing technique will ensure hands are clean. Hand sanitizers are only effective when applied to physically cleaned hands and should not be used to replace hand washing.

What supplies should be provided at hand washing and bathroom sinks?



Hand washing sinks in processing areas and in the bathrooms should be supplied with: an adequate supply of hot and cold running water, soap, a suitable method of hand drying (e.g. paper towels from a dispenser or hand dryers), a trash container and signage instructing employees when and how to wash their hands.

Hand washing sinks must be located close to the working area, accessible and unobstructed and maintained in good working condition. Throughout the day, check and replenish these supplies and, if necessary, repair improperly working sinks.

Should separate sinks be provided for hand washing and equipment washing?

Yes. Hand washing sinks must be dedicated to hand washing only. When hand washing sinks are used for food preparation or for cleaning utensils, hands can become contaminated with residue left from foods and soiled utensils. At the same time, it is inappropriate to wash hands in a food preparation sink or a multi-compartment equipment washing sink because dirty hands can contaminate the sink basin, especially if used by employees returning from bathrooms. Sinks used for cleaning equipment such as mops, must never be used for anything other than the designated purpose.

What should I do if I observe condensation in a food processing area?

Remove any food products, food packaging material, utensils, or movable food contact surfaces from under the area with the condensation. Clean the accumulated condensation, and then clean and sanitize the stationary food contact surfaces affected by the condensation. Determine if any food, food packaging material, or utensils were affected, and determine

their disposition. Monitor for condensation formation daily and correct the root cause of the problem to prevent any future occurrences.

What do I need to monitor related to toxic compounds?

Toxic compounds include cleaners, detergents, sanitizers, pesticides, lubricants, etc. and should be handled with caution. Daily monitoring should confirm that cleaning compounds are approved for use in a food processing environment, that the proper sanitizer concentration is used according to the label and that they are stored, in areas where food is not stored, where they cannot contaminate food products or food packaging. Scented cleaners, sanitizers and lubricants that are not approved for use on food contact surfaces should not be used.

How can I best monitor my employee's health and hygienic practices?



Start by establishing a company health policy. Employees must be made aware of the policy protocol for reporting certain symptoms or illnesses to management. Before and during work, monitor employees' hands and wrists for uncovered infected cuts and boils and symptoms such as vomiting, diarrhea, sore throat, fever or jaundice. Based on the monitoring observations, determine if they need to be restricted or excluded from work. Companies can use FDA Form 1-B Conditional Employee or Food Employee Reporting Agreement ([link below](#)) as a reference to write their company health policy.

How do I know when to restrict or exclude an employee from work?

If an employee is showing symptoms such as, vomiting, diarrhea, sore throat with fever or jaundice you need to ask them questions to determine if they need to be excluded or restricted from working with foods. Making the decision to exclude or restrict employees from work can be done using the Employee Illness Decision Guides ([link below](#)).

I already have a pest control service, do I still need to monitor for pests?



Yes. Whether or not you use a pest control service, monitoring for the presence of pest is still your responsibility. Companies should monitor that their surroundings are clean and free of trash that can provide food, water and protection to pests. The building structure should be secured so that it prevents the entry of pests. The inside of the plant should be kept clean including equipment, food contact surfaces and areas where food and food packing materials are stored.

Make sure to review the inspection report provided by the pest control service and take action if deficiencies are noted. The paperwork left by the pest control service provides documentation of treatments and corrections, and should be kept as part of your pest control monitoring records.

I usually correct deficiencies when I see them; do I still need to record them on the monitoring record?

Yes. Always record the corrections to sanitation deficiencies when you see them. If the deficiency is noticed but can't be corrected right away, make a note of this in the monitoring record. Keep in mind that writing corrections to deficiencies on the monitoring records is not an indication of poor plant practices but that the facility is actively managing their sanitation program.

What do I need to do with the sanitation monitoring records?

Sanitation monitoring records must be retained by the processing facility and be available for inspection by the regulatory authorities. Retain sanitation monitoring records at least 1 year for refrigerated products and 2 years for frozen products.

Where can I go for help or more information?

You can download the manual titled “Sanitation Control Procedures for the Processing of Fish and Fishery Products” (link below). This manual was developed by the Seafood HACCP Alliance to assist industry to adequately monitor, correct and document their sanitation controls under the Seafood HACCP Regulation.

For questions related to the information presented here, refer to the following agencies below.

Virginia Department of Health Division of Shellfish Sanitation: http://www.vdh.state.va.us/environmentalhealth/shellfish/			Virginia Department of Agriculture and Consumer Services Food Safety Program http://www.vdacs.virginia.gov/food-food-safety-and-consumer-protection.shtml	Virginia Tech Seafood Agricultural Research and Extension Center http://www.arec.vaes.vt.edu/virginia-seafood/
Norfolk office 830 Southampton Avenue Norfolk, VA 23510 757-683-8461	Whitestone office 482 Chesapeake Drive Whitestone, VA 22578 804-435-1095	Accomack office 23177 Front Street Accomack, VA 23301 757-787-5864	PO Box 1163 Richmond, VA 23218 804-786-3520	102 S. King Street Hampton, VA 23669 757-727-4861

Website links

Form 1-B

<http://www.fda.gov/downloads/Food/GuidanceRegulation/RetailFoodProtection/IndustryandRegulatoryAssistanceandTrainingResources/UCM194575.pdf>

Employee Illness Decision Guides

http://www.fairfaxcounty.gov/hd/food/foodpdf/ehf31_hsp_employee_health_guidelines_rev_1210.pdf

“Sanitation Control Procedures for the Processing of Fish and Fishery Products” Manual developed by the National Seafood HACCP Alliance

<https://www.flseagrant.org/publications/seafood/>

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