Revisting Sanitation Performance Standards

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There has been so much attention over the past 20 years put on writing, monitoring and documenting SSOP and HACCP programs that the Sanitation Performance Standards (SPS) have been put on the back burner by many processors. I will admit that I have not known much about SPS. I don't remember anything mentioned about SPS in the HACCP Train the Trainer program or other FSIS communication since HACCP was implemented. Now I am reminded that inspected establishments must comply with two regulatory requirements related to sanitation: SSOP and SPS

There was one ODA trainer who asked me to include some SPS forms in the HACCP training binder, but after they moved on, I had forgotten about those forms until someone asked me in a recent class about the significance of those old forms. After a couple of close calls in which companies had issues with potentially adulterated product, I realized that I needed to get back up to speed on SPS. I plan to replace those old forms with updated information.

The following 4 factors are described by FSIS as being able to "reduce the risk of direct product contamination, and adulteration and are essential to the implementation of HACCP systems:"

- Effective environmental sanitation or cleanliness…
- …coupled with sanitary maintenance of equipment and utensils
- Good personal hygiene
- Proper food handling practices

SSOPs are designed to address the sanitary maintenance of equipment and utensils, and the SPS are designed to address environmental sanitation. Critical elements of environmental sanitation include:
- Safe water supply and distribution
- Unpolluted air
- Sound construction of facilities
- Effective vermin control
- Proper waste handling, disposal and treatment

Perhaps, the reason that inspected establishments have not been keeping up on environmental sanitation is that there are no required daily records to generate and maintain. Some documentation is required, such as safety of chemicals used, water potability certificate, private sewage disposal, etc.

The performance standards, that make up SPS, are targets for companies to achieve, but regulators have told me that they do not care about the specifics of how establishments meet those standards, just that the standards are met. Using whatever means they choose, establishments still need to:
- Operate under sanitary condition
- Ensure product is not adulterated
- Operate in a manner that does not interfere with FSIS/ODA inspection and enforcement of the standards.

It seems that so much emphasis has been put on complying with the HACCP and SSOP requirements for the past 20 years, that some meat processors aren't keeping up with environmental sanitation and general maintenance, which can result in problems with pests and rodents. What I have experienced recently is that large quantities of meat could have been condemned by FSIS/ODA due to not keeping up with SPS, and not a deviation in a HACCP or SSOP plan. I have

found, with issues of non-potable water, presence of mouse droppings, etc., that food safety assessment is more difficult than with critical limit deviations. I would encourage meat processors to reassess how well they are meeting their SPS.

For more information on the SPS, go to 9 CFR 416.1-416.5.