Checklist for GMP Requirements

Conditions Outside Your Facility

☐ Are the grounds around your plant clear of weeds, tall grass and debris (including old equipment) to minimize attraction to pests? If not, make a list of the things you need to do to eliminate the problem.

☐ Is your road or driveway maintained so mud is not tracked into the plant and there is no standing water? If not, develop a plan to repair roads, driveways or parking lots and keep them properly maintained.

☐ Is there standing water on the grounds, which may attract pests? If standing water is a problem, develop a plan to make repairs to correct the problem and keep the grounds properly maintained.

☐ Do you have a procedure to routinely monitor conditions outside the plant? Do you need to develop routine monitoring procedures or modify existing ones?

Pest Control Program

☐ Do you have an active program to eliminate pests from areas where food is received, processed or stored? If not, what control measures are needed and how they will be implemented?

☐ Do you have a system to actively monitor pest control devices or procedures to make sure that they are not a source of filth or other contamination? Do you need to develop new monitoring procedures or modify existing ones?

☐ Do you have a system to conduct daily monitoring of all areas where food is handled or stored to make sure that no pests are present? Do you need to develop new monitoring procedures or modify existing procedures?

Conditions Inside Your Facility

Floors, Walls and Ceilings

☐ Are floors, walls and ceilings made of suitable material that can be kept clean and sanitary? If not, make a list and develop a plan to replace or repair problem areas.

☐ Are damaged walls, ceilings or other structures providing a harborage for pests? If so, make a list and schedule repairs that are needed.

☐ Do you have a system to routinely monitor the condition of floors, walls and ceilings?

☐ Do you need to develop new monitoring procedures or modify existing ones?

Plant Design

☐ Have you provided adequate space for processing operations? If not, what changes need to be made to make sure that there is enough room between equipment, processing lines, or work stations for employees to do their job and prevent food from being contaminated?
Do you have a system to routinely monitor processing activities to make sure that there is adequate space for the work conducted?
Do you need to develop new monitoring procedures or modify existing ones?

Ventilation, Condensation and Drip
Is the air in your plant free from noxious odors or steam and if so, is ventilation equipment used so that it doesn’t contaminate the food? If not, develop a plan to make changes or upgrades to your ventilation system as necessary.
Are high humidity conditions causing condensate to collect on ceilings, walls or fixtures that could contaminate food or food handling areas or equipment? If so, develop a plan to make changes or repairs to the ventilation system or the location of fixtures as necessary.
Do you have a system to routinely monitor conditions in the plant to prevent contamination by condensate and drip and perform routine maintenance in the ventilation or HVAC system?
Do you need to develop new monitoring procedures or modify existing ones?

Lighting
Do you have enough light in hand washing areas, dressing and locker rooms, toilet rooms, and all areas where food is examined, processed, or stored? If not, develop a plan to make changes or repairs as necessary.
Are all light bulbs or fixtures properly shielded or made of shatter resistant glass to protect workers and prevent food contamination? If not, develop a plan to replace or fix all fixtures as necessary.
Do you have a system to routinely monitor lighting conditions and fixtures? Do you need to develop new monitoring procedures or modify existing ones?

Waste Disposal
Are food waste and other garbage properly collected and stored inside the plant before it is disposed of?
Is the dumpster or other waste disposal or collection equipment providing an attractant or harborage for pests? If so, what do you need to do to correct the problem?
Do you have a system to routinely monitor the handling of food waste and garbage in the plant?
Do you need to develop new monitoring procedures or modify existing ones?

Water Supply
If your water is from a public water system do you have records to verify the source and safety of your water? If not what records or information can you get and keep on file?
If you use water from a well or other private source, have you obtained the necessary
permits or approval, and have you conducted all required testing and kept records of test results to demonstrate that the water you are using meets current safety standards. If not, what do you need to do before you can use this water source?

- Do you have a schedule to routinely check the water temperature at all locations where hot water is needed? If you do not have enough hot water, what do you need to do to get enough hot water?
- Do you need to routinely check the water pressure at all locations where water is needed? If so, how and when will you make these checks?

**Plumbing**

- Does your existing plumbing system meet all plumbing codes or regulations for proper design and capacity? If not, what needs to be done to make the necessary corrections?
- Does your plumbing for liquid waste disposal meet all design requirements and have an adequate capacity? If not, what needs to be done to make the necessary corrections?
- Do your floors drain properly?
- Do you have an adequate number of floor drains in the proper location? If not, what can be done to correct the problem? If remodeling or new construction is not an option, what changes can be made to make sure that standing water is not a source of contamination?
- Do you have any backflow prevention systems or devices? If yes, do you have a procedure to check that they are operating properly? If no, do you need to install any backflow prevention devices?
- Do you need to conduct any periodic maintenance of plumbing and waste disposal systems? If yes, how and when will you conduct these tasks?

**Sewage**

- Does your system for sewage disposal have adequate capacity and meet all local regulations or codes? If not, what changes need to be made to meet these requirements?
- Do you have a plan to respond to unusual events such as sewer backups, flooding or other occurrences? If not, how will you develop this plan?

**Toilets**

- Do you have the proper number of toilet facilities in the proper location? If not, what changes need to be made and how will you make them?
- Does each toilet facility have tight fitting and self-closing doors, proper ventilation and hand washing facilities? If not, what needs to be corrected, and how will these corrections be made?
- Do you have a procedure to routinely check, maintain, and clean toilet facilities? If not, what procedures are needed and how will they be developed and implemented?
Design, Construction and Location of Equipment, Utensils and Food Contact Surfaces, Processing Lines and Conveyances

☐ Do you have a procedure or standards for evaluating all new equipment, utensils, processing lines, conveyors, and holding units before they are purchased to make sure that they:
  • Meet current food and worker safety standards? If not, what standards do you need to meet?
  • Are made of material that is the best choice for the task while balancing cost, ease of maintenance, and durability requirements? What options are available?
  • Are designed and constructed properly to prevent food from being contaminated when the item or system is used? Make a list of design defects to be avoided such as dead ends, hollow rollers, nuts and bolts, seals, moving parts over food contact surfaces.
  • Can be easily taken apart and cleaned and sanitized? Are their options that can make cleaning and sanitizing more effective?

☐ Do you have a procedure to routinely evaluate existing equipment, utensils, processing lines, and conveyances to detect signs of corrosion, pitting, scarring, cracking or other deterioration that could harbor harmful bacteria and make it difficult to clean and sanitize?

☐ Do you have a procedure for fixing, removing or discarding equipment, utensils, processing lines, or conveyances that are damaged and cannot be kept clean and sanitary?

Monitoring Cold Storage

☐ Do all refrigeration or freezer units have an indicating thermometer or other temperature sensing or recording device that meets appropriate standards for use with food products and is accurate to ±3°F (2°C)?

☐ Do you have a procedure to routinely calibrate thermometers or temperature sensing devices as required by current regulations and recommended by the manufacturer?

☐ Do all refrigeration or freezer units have an automatic control system to regulate the temperature of these units or an alarm system to alert managers when units are outside the desired temperature range?

☐ Do you have a procedure to routinely monitor the temperature of all refrigeration and freezer units and to keep records if necessary?

Food Monitoring Devices

☐ Do you need food monitoring devices for your operation, such as thermometers, pH meters, salometers, or other devices?

☐ If food monitoring devices are needed, do you have procedures to make sure that all food monitoring devices meet current standards for use in food processing?

☐ Do you have procedures to properly maintain and calibrate all food monitoring devices as required by current regulations and recommended by the manufacturer?

☐ Have you trained your employees to use monitoring devices correctly?
Compressed Gases
□ Do you use compressed air or gases? If so, do you have a procedure in place to make sure that all gases meet current food and worker safety standards?
□ Do you have procedures in place to clean, replace or otherwise maintain filters and other components of compressed air or gas systems to prevent food, food contact surfaces, or packaging materials from contamination?

Employee Health
□ Do you have company policies and procedures that describe the symptoms, illnesses, or conditions that employees must report to their supervisor? Do you need to develop new policies or procedures or modify existing ones?
□ Do you have an employee handbook and/or conduct training for employees and supervisors that explains company policies and procedures for employees who may have an illness that could be transmitted to food? Do you need to develop a handbook or training programs or modify existing ones?
□ Do you have procedures for routinely monitoring employees and their behavior to detect symptoms of illness? Do you need to develop new monitoring procedures or modify existing ones?

Employee Cleanliness and Hygiene
□ Do you have policies and procedures that describe company requirements for:
  • Garments, body covering and shoes or boots?
  • Hair and beard or moustache covering or restraints?
  • Personal cleanliness?
  • Use of jewelry, cosmetics, skin care products and medicines?
  • Prohibited activities such as eating, smoking, and drinking?
  • Personal item restrictions in work areas?
□ Do you have an employee handbook and/or conduct training programs to explain these policies and procedures to employees? Do you need to develop new training materials or modify existing ones?
□ Do you have procedures for routinely monitoring employees’ attire, cleanliness and hygiene? Do you need to develop new monitoring procedures or modify existing ones?

Hand Washing
□ Do you have the proper hand washing facilities or stations in all of the proper locations where they are needed? Make a list of repairs or installations that are needed.
□ Do you have a procedure to routinely monitor all hand washing stations to make sure that they are properly equipped with hot water, soap, and disposable towels? Do you need to develop new monitoring procedures or modify existing ones?
□ Do you have a company procedure that describes how, when, and where employees must wash their hands or use gloves? Do you need to develop these procedures or modify existing ones?
☐ Do you conduct training to make sure that employees understand how, when and where they must wash their hands? Do you need to develop new training programs, modify existing ones, or conduct them more frequently?
☐ Do you have a procedure to routinely monitor employees to make sure that they are washing their hands properly at the proper time or using gloves properly? Do you need to develop new monitoring procedures or modify existing ones?

Training and Supervision
☐ Do the people responsible for identifying sanitation failures and problems related to employee practices and behavior have the training and/or experience that is necessary? What additional training is needed and can be provided?
☐ Has responsibility been clearly assigned to one or more individuals for making sure that all employees comply with all hygiene and hand washing requirements? Do these people have the necessary training or skills? If not, what additional training is needed?

Cleaning and Sanitizing Procedures
☐ Do you have cleaning and sanitizing procedures for all food contact surfaces, equipment, utensils, processing lines, conveyors, storage units, and non-food contact surfaces and facilities that describe:
  • What cleaning and sanitizing chemicals will be used?
  • How the proper solutions will be prepared and the concentration will be checked?
  • How cleaning and sanitizing solutions will be applied and what cleaning tools should be used?
  • The proper sequence of steps for each cleaning and sanitizing procedure?
  • When these procedures will be conducted?
  • Who will conduct these procedures?
☐ Do you need to develop any new procedures or use new chemicals, delivery methods, or cleaning tools or modify any existing ones? If so, how will you make the necessary changes and where will you get the necessary chemicals, equipment or tools? What resources are available to help such as sanitation suppliers, university specialists, or trade associations?
☐ Do you train employees who conduct cleaning and sanitizing activities to make sure that they understand how to conduct procedures properly? Do you need to add new training programs, modify existing ones, or conduct them more frequently?
☐ Do you routinely monitor the effectiveness of cleaning and sanitizing procedures using visual inspections and testing if necessary? Do you need to develop new monitoring procedures or modify existing ones?

Cleaning and Sanitizing Agents
☐ Do you have documents from suppliers of cleaning and sanitizing chemicals that demonstrate that they comply with all current regulations for use in food
establishments and are safe to use? If not, what documents are needed and how can you obtain them?
- Do you have written or label instructions that describe how to use and store all cleaning and sanitizing chemicals properly? If not, what information is needed and how can you obtain it?
- Do you have procedures to check all deliveries of cleaning and sanitation chemicals to make sure that they are what were ordered and that all of the necessary instructions and documentation are on file? If not, what procedures are needed and how will they be developed?

**Quality Control Operations and Supervision**
- Do you have a quality control system that describes what procedures or reasonable precautions must be in place at each step of your operation to prevent food contamination? If not, what procedures are needed or what changes need to be made?
- Have you assigned one or more qualified individuals to supervise quality control and plant sanitation activities? If not, who is qualified to coordinate and supervise these activities?
- Do you need to provide additional training to help these individuals develop and supervise plant activities?
- Do you have a system to routinely monitor plant activities to identify sanitation failures or incidents that could contaminate food products? If not, what monitoring activities are needed and who will conduct them?
- Do you have a procedure to evaluate and test food products, ingredients, food contact surfaces or the plant environment when necessary to identify when contamination events or sanitation failures have occurred?
- Does your procedure describe how decisions will be made about the safety of any affected products and what actions will be taken when contamination is confirmed?
- Do you need a procedure for reprocessing food products to eliminate contamination? If so, how will you develop a pre-determined process based on a valid scientific study to eliminate contamination?

**Preventing Cross Contamination During Processing**
- Do you have procedures to prevent direct cross contamination of finished, cooked, or ready-to-eat food products by raw products, garbage, and employees? If not, what procedures are needed or what changes need to be made?
- Do you have procedures to prevent food products from being contaminated by equipment, utensils, containers, and conveyors? Does your procedure describe how and when these items will be cleaned and sanitized between uses, color coding strategies, or other steps that are necessary to prevent contamination? If not, what procedures or changes are needed?
- Do you have procedures to minimize the spread of contamination when people, equipment and utensils move from one area of the plant to another? If not, what
procedures such as hand washing, changing outer garments and gloves, foam barriers for footwear and wheels of equipment, cleaning and sanitation of equipment prior to movement, are needed?

☐ Have you trained employees to make sure that they understand company procedures that must be followed to prevent cross contamination? If not, what training is needed and how will you deliver it?

☐ Do you have procedures to routinely monitor plant conditions and activities to identify when conditions develop that could lead to cross contamination and to make sure that they are immediately corrected? If not, what procedures are needed?

Preventing Contamination by Containers and Packaging Materials

☐ Do you have a procedure to evaluate the containers and food packaging materials you use to determine that they are safe and suitable for your food products? If not what procedures or changes are needed?

☐ Do you routinely monitor packaging activities to make sure that proper practices are followed and mistakes are immediately corrected? If not what procedures or changes are needed?

Separation of Edible Food From Non Edible Products

☐ Do you handle any non-edible foods or other products? If so, do you have a policy that will prevent edible food products from being contaminated in your facility consistent with all current regulations? If not, what procedures or changes are needed?

☐ Do you routinely monitor plant operations to make sure that this policy is followed? If not, what monitoring procedures are needed?

Allergen Controls

☐ Do you receive, store or process any foods that contain allergens? If so, do you have procedures in place to make sure that labeling controls and/or process controls are in place to meet all requirements of the current allergen control regulations? If not, what procedures are needed?

☐ Do you routinely monitor your food products, ingredients, labeling and processing procedures to make sure that the proper controls for food allergens are used? If not, what monitoring procedures are needed?

Evaluating and Handling Raw Materials and Ingredients

☐ Do you have procedures that describe how you will inspect and evaluate each delivery of food and ingredients to make sure that they are clean and suitable for use as food, and how contaminated items or containers will be separated from acceptable items and rejected or disposed? If not, what procedures are necessary and how will they be developed?

☐ Do you have a procedure that describes how products will be washed when necessary before they are stored? If mechanical systems such as conveyors will be used, do you have procedures that describe how they will be maintained and cleaned and sanitized? If not, what procedures are needed?
Preventing Contamination with Harmful Microorganisms

- Have you determined what types of harmful microorganisms are likely to be a concern for your products? If not, how will you evaluate this risk?
- Have you taken all steps that are necessary to communicate with or inspect your suppliers or test their products to make sure that their practices prevent the food or ingredients you receive from containing levels of harmful microorganisms that could cause illness? If not, what actions are needed?
- Do you need to have a validated pasteurization process to eliminate harmful microorganisms in the food that you process? If so, how will you work with a processing authority or food safety expert to develop a scientifically valid pasteurization process?
- Do you need a procedure for reprocessing food products to eliminate contamination? If so, how will you work with a process authority or food safety expert to develop a pre-determined process based on a scientifically valid study to eliminate contamination?

Preventing Contamination With Natural Toxins or Unavoidable Defects

- Do you receive, store or process any foods like grains, nuts, or other plant based foods that are susceptible to contamination by aflatoxin or other toxins produced by molds? If so, have you taken all steps that are necessary to communicate with or inspect your suppliers or test their products to make sure that their practices prevent the food or ingredients you receive from containing harmful levels of these toxins?
- Are there any defect action levels for food or ingredients that you receive, store or process? If so, have you taken all steps that are necessary to communicate with or inspect your suppliers or test their products to make sure that their practices prevent the food or ingredients you receive from exceeding any current defect action levels?

Ice

- Do you use ice on or in any food or ingredients? If so, do you have procedures and the necessary equipment to produce ice that is clean and sanitary? If not, what equipment or procedures are needed?
- Do you have procedures to maintain, clean and sanitize, and monitor ice making equipment, and utensils or containers used to transport or store ice? If not, what equipment and procedures are needed?

Food Storage

- Have you determined what storage conditions are necessary for all of the food and ingredients that you store? If not, how will you determine the necessary conditions?
- Do you keep frozen raw materials and ingredients frozen? If so, do you have procedures to monitor frozen storage conditions to prevent these food products from becoming contaminated?
- Do you thaw frozen foods? If so, do you have procedures to thaw foods properly to prevent temperature abuse and contamination?
- Do you receive, store or process refrigerated foods that can support the growth of
harmful microorganisms? If so, do you have procedures and the necessary equipment to keep these foods at the proper temperature outside of the Danger Zone (e.g. 41°F (5°C) to 140°F (60°C)) to prevent the growth of harmful microorganisms? If not, what procedures, equipment or changes are needed?

☐ Do you have the proper equipment (e.g. calibrated thermometers) and procedures to routinely monitor refrigerated storage conditions. If not, what equipment and procedures are needed?

☐ Do you receive or store foods that rely on a low water activity or moisture content to prevent the growth of harmful microorganisms? If so do you have procedures and the necessary equipment to keep these foods from absorbing moisture that could enable harmful microorganisms to grow? If not, what procedures, equipment or changes are needed?

☐ Do you have the proper equipment and procedures to routinely monitor storage conditions for dried foods? If not, what equipment and procedures are needed?

**Process Controls**

☐ Have you determined what physical factors such as time and temperature, water activity, humidity, or pH must be controlled in the food or ingredients that you process to prevent the growth of harmful microorganisms? If not, how will you make this determination?

☐ Do you manufacture or process foods that rely on heat or other lethal treatments such as pressure or irradiation to kill and eliminate harmful microorganisms? If so, do you have a scientifically valid process to consistently produce finished products in which all harmful microorganisms have been eliminated? If not, how will you work with a process authority or food safety expert to develop a scientifically valid process?

☐ Do you blanch any food using heat? If so, have you determined the minimum temperature and time that are necessary and how these heat treated foods will be cooled properly? If not, how will you work with a processing authority or food safety expert to develop a scientifically valid process?

☐ Do you manufacture or process dry or intermediate moisture foods that rely on a low water activity to prevent the growth of harmful microorganisms? If so, do you have a scientifically valid process to consistently produce finished products with the proper water activity? If not, how will you work with a processing authority or food safety expert to develop a scientifically valid process?

☐ Do you manufacture or process foods that rely on acidification to a pH below 4.6 to prevent the growth of harmful microorganisms? If so, do you have a scientifically valid process to consistently produce finished products with the proper water activity? If not, how will you work with a processing authority or food safety expert to develop a scientifically valid process?

**Preventing Metal Contamination**

☐ Are any of the food or ingredients that you use susceptible to contamination with metal or other sharp objects? If so, have you inspected your suppliers or evaluated
their products to make sure that their practices prevent metal contamination? If not, how will you complete this evaluation?

☐ Are your processing activities or equipment likely to contaminate food or ingredients with metal or other sharp objects? If so, do you have procedures to either remove metal or use a metal detector to screen any ingredients or finished food products? If not, do you need to install and operate a metal detector for finished products or use other methods to remove metal or other sharp objects?

**Proper Use and Storage of Toxic Chemicals**

☐ Have you evaluated all chemicals or other potentially toxic products and verified that they are necessary for plant operations and are safe for their intended use? If not, how will you check your inventory and evaluate all new chemical products?

☐ Do you have documents from chemical or other product suppliers on file to demonstrate that are not contaminated and safe and adequate for their intended use? If not, how will you obtain the necessary documents?

☐ Do you have a procedure for inspecting all chemicals when they are received to make sure that they are the product that was ordered and that they are labeled properly? If not, what procedure is needed?

☐ Do you routinely monitor the plant environment to make sure that no unapproved or improperly labeled chemicals are present? If not, what monitoring procedures are needed?

☐ Are all of the toxic chemicals that you use properly stored to prevent accidental contamination of food, food contact surfaces or the plant environment? If not, what changes need to be made?

**Warehousing and Distribution**

If you are a warehouse or you distribute food products have you:

☐ Determined what reasonable precautions are needed to protect food from contamination and to prevent spoilage at those steps in your operation where food is stored or transported? If not, how will you evaluate all of the food that you store or distribute?

☐ Installed the proper equipment and implemented procedures to protect food from contamination and make sure that proper conditions are maintained to prevent food spoilage or deterioration during storage and transportation? If not, what equipment and procedures are needed?

☐ Developed routine monitoring procedures for storage and transportation conditions to make sure that food is protected from contamination and the proper conditions to prevent deterioration are maintained.

**Outdoor Fermentation Vessel**

☐ Do you have any outdoor fermentation vessels? If so, are they covered? Do you have procedures to control or eliminate pests and routinely monitor them? If not, what control measures and monitoring procedures are needed?
Disposal or Reconditioning of Adulterated Food

☐ Do you have a procedure that describes how your company will determine if food that has been adulterated or contaminated, and how decisions will be made about the final disposition of the product? If not, how will you develop this procedure?

☐ Do you have a procedure that describes how adulterated or contaminated food will be disposed of properly? If not, how will you develop this procedure?

☐ Do you need a plan for reconditioning adulterated or contaminated food? If so, do you have a plan consistent with current regulations that describes how adulterated or contaminated food that meets pre-determined conditions will be reconditioned or diverted to acceptable non-food or non-feed uses. If not, how will you develop this plan?

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