

## **Primus Audit Scoring Guidelines – Packing House with HACCP v008.06**

**<http://www.primuslabs.com/docs/guidelines/PackinghousewithHACCPAuditScoringGuidelinesv08.06REV4.pdf>**

### **Microbial Tests**

Potentially useful websites :-

CDC Disease Information, <http://www.cdc.gov/ncidod/dbmd/diseaseinfo/#E>

FDA Bad Bug Book, <http://www.cfsan.fda.gov/~mow/intro.html>

EPA Drinking Water Standards, <http://www.epa.gov/safewater/mcl.html#mcls>

USDA, Water Quality Information Center, <http://www.nal.usda.gov/wqic/>

#### **2.8.1. Are there records of routine equipment microbiological testing?**

Visual confirmation. Total compliance (5 points): There should be records of equipment microbiological swab testing, for production and storage facilities that either have a washing step or involves high humidity storage. This testing should be designed to assess the equipment sanitation process. Production facilities that require swab testing will most likely be producing (or storing in the case of coolers) items that are consumed in a raw state (uncooked) and with edible peel or skin. Note that citrus peel is often used in drinks, used for zesting, etc. This question is not applicable for products that require cooking e.g. potatoes and/or outer layer of commodity (rind, peel, skin, etc.) is not consumed or used as a food item in any way e.g. “dry” onions, avocados, etc; although testing in any operation is encouraged. Testing frequency should be related to the risk assessment of the production involved. For example a fresh-cut facility should be carrying out weekly checks, whereas low risk products e.g. apples, citrus should be checked monthly. Choosing where to swab, should be done by assessing the main pieces of equipment that might need swabbing, based on risk and ease of ability to clean. If out of specification results are detected, then full details of corrective actions should be noted. Cooling operations should include ice injectors, vacuum tubes (both wet (hydro) and dry)) in the microbial testing rotation. Auditor should note the type of tests being carried out, and frequency of testing. See the applicability chart.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of equipment being missed off the swabbing schedule, incorrect frequency.
- Single/isolated instance(s) of a record or records showing high counts but no corrective action documentation.

Major deficiency (1 point) if:

- Numerous instances of equipment being missed off the swabbing schedule, incorrect frequency.
- Testing is sporadic and not on a scheduled basis.
- Numerous records showing high counts but there are no corrective actions documented.

Non-compliance (0 points) if:

- There are no records of equipment microbiological testing.

#### **2.8.2 Are there records of routine facility environmental testing?**

Visual confirmation. Total compliance (5 points): There should be records of facility environmental swab testing, for production and storage facilities that either have a washing step or involves high humidity storage. This swab testing should be designed to assess the facility sanitation process. Production facilities that require testing will most likely be producing (or storing in the case of coolers) items that are consumed in a raw state (uncooked) and with edible peel or skin. Note that citrus peel is often used in drinks, used for zesting, etc. This question is not applicable for products that require cooking e.g. potatoes and/or outer layer of commodity (rind, peel, skin, etc.) is not consumed or used as a food item in any way e.g. “dry” onions, avocados, etc; although testing in any operation is encouraged. Testing frequency should be related to the risk assessment of the production involved. For example a fresh-cut facility should be carrying out weekly checks, whereas low risk products e.g. apples, citrus should be checked monthly. Choosing where to swab, should be done by assessing the areas that might need swabbing, based on risk issues observed e.g. drainage, condensation issue; etc. If out of specification results are detected, then full details of corrective actions should be noted. Auditor should note the type of tests being carried out and frequency of testing. See the applicability chart.

Minor deficiency (3 points) if:

- Single/isolated instance(s) of environmental testing not occurring at the right frequency.
- Single/isolated instance(s) of a record or records showing high counts but no corrective action documentation.

Major deficiency (1 point) if:

- Numerous instances of environmental testing not occurring at the right frequency or testing is sporadic and not on a scheduled basis.
- Numerous records showing high counts but there are no corrective actions documented.

Non-compliance (0 points) if:

- There are no records of equipment microbiological testing.

**2.8.3. Is there at least an annual microbiological test on water used in the facility (sampled from within the facility)?**

Visual confirmation. Total compliance (10 points): There should be at least an annual microbiological test on potable water used in the facility. The water sample should be taken from the operation (either by the company itself or the local water company). Water samples taken from the site, account for the sites piping, holding tanks, etc. Facilities using well water should also test at the well. City water samples are still good information to have, but if there is no site sample, then this question should be scored minor. Results of water sample testing should meet the US EPA drinking water **microbiological** specification <http://www.epa.gov/safewater/mcl.html#mcls>. If out of specification results are detected, then full details of corrective actions should be noted.

Minor deficiency (7 points) if:

- Only water testing records available are from the City Water Board.
- Last test was done over a year ago, but not greater than 18 months ago.

Major deficiency (3 points) if:

- Last test was done over a year ago, but not greater than 24 months ago.
- Single high count recorded and lacking corrective action documentation.

Non-compliance (0 points) if:

- No microbiological test results are available.
- Last test was done over 24 months ago.
- More than one high count recorded and lacking corrective action documentation.

**2.8.4 Is there (at least) an annual microbiological test for in-house produced ice or a letter of guarantee from external suppliers of ice?**

Visual confirmation. Total compliance (5 points): There should be at least an annual microbiological test on ice used in the facility if the ice is produced “in-house” by the company. The ice sample should be taken from the operation (either by the company itself or the local water company). Ice samples taken from the site, account for the sites piping, holding tanks, ice making equipment and ice storage, etc. Results of ice sample testing should meet the US EPA drinking water **microbiological** specification <http://www.epa.gov/safewater/mcl.html#mcls>. If out of specification results are detected, then full details of corrective actions should be noted. For ice procured from outside sources, there should be a letter of guarantee (either written as an annual letter of guarantee or a continuing letter of guarantee), that at least states that the ice meets all relevant legislation (potability, food safety, etc.). If an ice supplier provides a recent microbiological test of the ice produced, this is also acceptable.

Minor deficiency (3 points):

- In-house or external ice supplier - last ice micro test was done over a year ago, but not greater than 18 months ago.
- Letter of guarantee (for externally supplied ice) is older than one year but less than 18 months old (unless a letter of continuing guarantee and there is no relevant test).

Major deficiency (1 point):

- In-house or external ice supplier - last test ice micro test was done over a year ago, but not greater than 24 months ago.
- Letter of guarantee (for externally supplied ice) is older than one year but less than 24 months old (unless a letter of continuing guarantee and there is no relevant test).
- Single high count recorded and lacking corrective action documentation

Non-compliance (0 points):

- Ice is used from an outside source but there is no letter of guarantee (and no ice micro test).
- In-house or external ice supplier – the last test was done more than 24 months ago.
- More than one high count recorded and lacking corrective action documentation.