

SPS vs. Sanitation SOP vs. HACCP Job Aid

Instructions: Review this Job Aid and policy documents, regulations, and inspection methodologies with a mentor.

Acronyms/Definitions

- SPS – Sanitation Performance Standards ([9 CFR 416.1 – 416.5](#)); these regulations cover aspects of establishment sanitation that can affect food safety such as pest control, adequate ventilation and lighting, and plumbing systems.
- Sanitation SOP – Sanitation Standard Operating Procedures ([9 CFR 416.12 – 416.16](#)); these regulations require establishments to develop written Sanitation SOPs that the establishment will perform to prevent direct contamination or adulteration of products.
- HACCP – Hazard Analysis and Critical Control Point ([9 CFR 417](#)); these regulations require establishments to implement a validated food safety (HACCP) system.
- Food Safety Hazard – Any biological, chemical, or physical property that may cause a food to be unsafe for human consumption.
- GAD – Gather, assess, determine.

Overview

- **SPS noncompliance** is a failure of an establishment to meet the regulatory requirements in [9 CFR 416.1 – 416.5](#). IPP assess and determine whether insanitary conditions exist.
 - SPS requirements are non-prescriptive and compliance determinations depend on whether the situation creates an insanitary condition or may lead to product contamination or adulteration.
 - Often, SPS noncompliance involves insanitary conditions that have not yet led to product contamination (e.g., pest control substances are stored in a manner that results in insanitary conditions but has not yet resulted in product contamination).
 - SPS noncompliance may also involve an establishment's failure to maintain certain documentation (e.g., the establishment is unable to provide documentation to demonstrate the safety of a chemical compound used in processing).
 - IPP may also verify SPS compliance when conducting the Beef Sanitary Dressing task ([FSIS Directive 6410.1](#)). IPP cite noncompliance with an appropriate SPS regulation when an insanitary condition occurs as the result of the establishment's ineffective implementation of sanitary dressing procedures.
- **Sanitation SOP noncompliance** is a failure of an establishment to meet the regulatory requirements in [9 CFR 416.12 – 416.16](#).
 - Often, Sanitation SOP noncompliance involves direct contamination of product or a food contact surface, because the establishment's Sanitation SOPs failed to prevent such contamination (e.g., an unclean food contact surface after the establishment's pre-op monitoring prior to beginning operations).
 - Sanitation SOP noncompliance may also involve situations where there is no product contamination, such as a Sanitation SOP recordkeeping failure (e.g., the establishment did not initial and date the Sanitation SOP record).

- **HACCP noncompliance** is a failure of an establishment to meet the regulatory requirements in [9 CFR 417](#).
 - When IPP observe direct product contamination that poses a **food safety hazard**, there is likely HACCP noncompliance (see the [Meat and Poultry Hazards and Controls Guide](#) and [Egg Products Hazards and Controls Guide](#) for examples of food safety hazards).
 - Other examples of HACCP noncompliance include recordkeeping failures, failures to support the written HACCP program, or failures to implement the program as written.
- SPS noncompliance can sometimes lead to Sanitation SOP or HACCP noncompliance. It is important to GAD each situation out to determine which regulations are noncompliant and what type of enforcement action IPP may take.

Basic Procedure

- When IPP identify noncompliance, they determine which regulation(s) the establishment is noncompliant with. IPP are to cite the most applicable regulations on the noncompliance record (NR).
- The following are general concepts to consider when determining SPS vs. Sanitation SOP vs. HACCP noncompliance. IPP are to GAD each specific situation to arrive at a supportable regulatory citation for each noncompliance observed.
 - When IPP observe insanitary conditions that do not involve direct product contamination or a food safety hazard, documenting SPS noncompliance may be most appropriate.
 - When IPP observe noncompliance due to a failure or problem with the establishment's Sanitation SOPs, documenting Sanitation SOP noncompliance may be most appropriate.
 - **Note:** When IPP observe Sanitation SOP noncompliance, they are not to automatically cite SPS regulations as noncompliant for the same observation. IPP are to cite both Sanitation SOP and SPS regulations (e.g. 416.13 and 416.4) when they observe *separate* Sanitation SOP and SPS noncompliances during the same inspection task. However, citing multiple regulations on a single noncompliance for the *same* observation is not necessary.
 - When IPP observe noncompliance that involves a food safety hazard, documenting HACCP noncompliance may be most appropriate.
- When IPP observe **product contamination**, they need to determine if the finding:
 - Has a food safety impact (likely HACCP noncompliance).
 - Is the result of a problem with the Sanitation SOP (likely Sanitation SOP noncompliance).
 - Is the result of a problem under sanitary dressing procedures in slaughter operations (type of noncompliance may vary depending on establishment's HACCP system - consult [FSIS Directives 6410.1](#), [6410.4](#), [6420.5](#)).

Discussion Points

- Review a recent SPS, Sanitation SOP, and HACCP noncompliance documented at the establishment and discuss the thought process IPP used to determine which regulations to cite.
- Discuss, using examples of contamination events (e.g., condensate dripping onto product), how IPP are to determine if the event has a food safety impact, is the result of a problem with the Sanitation SOP, or is the result of a problem under sanitary dressing procedures in slaughter operations ([FSIS Directive 5000.1](#), Ch. V., Sec. III., F.).

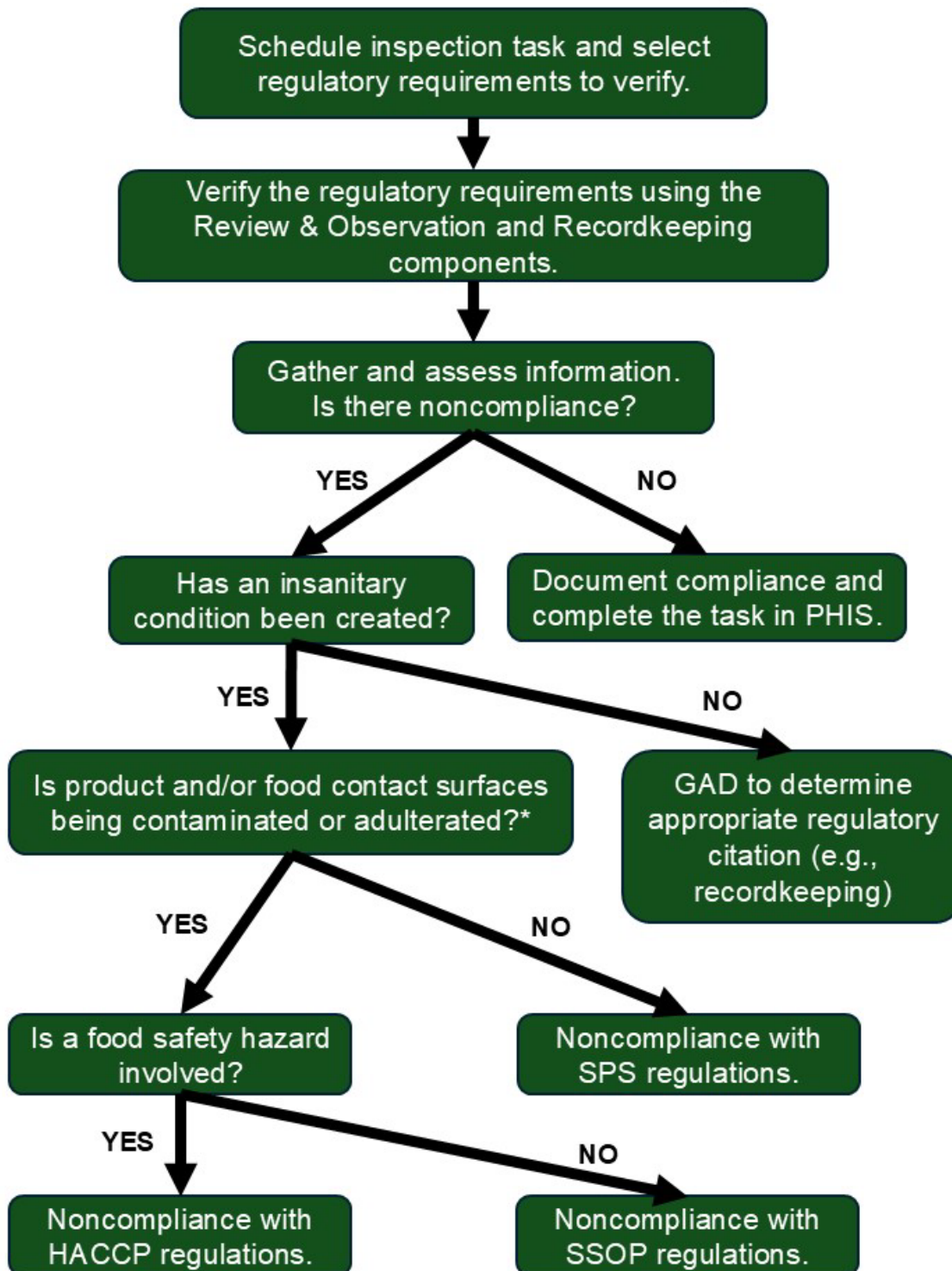
Knowledge Check

- IPP observe condensation dripping from an insanitary overhead surface onto raw product. What type of noncompliance would this likely be, if there are no food safety hazards involved?

Resources

- [FSIS Directive 5000.1](#) – *Verifying an Establishment's Food Safety System*
- [FSIS Directive 5000.4](#) – *Performing the Pre-Operational Sanitation Standard Operating Procedures Verification Task*
- IM Workbook – Sanitation Scenarios

SPS vs. SSOP vs. HACCP Noncompliance



*If the contamination is the result of a problem under sanitary dressing procedures in slaughter operations, consult FSIS Directive 6410.1 (beef), 6410.4 (swine), or 6420.5 (poultry).