Food Processing Plants

A food processing plant shall refer to any commercial operation that manufactures, packages, labels, or stores food for human consumption and does not provide food directly to the consumer. This includes, but is not limited to, establishments such as bakeries, warehouses, ice manufacturers, candy manufacturers, snack food plants, honey and syrup plants, establishments that repackage and distribute bulk-processed foods, canneries, frozen food plants and fish and game meat processing plants.

A food processing plant does not include a "food establishment" as defined under Subparagraph 1-201.10 (B)(31) in the 1999 Missouri Food Code.

Duties of BERL Staff

1. Develop program plans and guidelines.
2. Provide consultation and technical assistance.
3. Maintain statewide inventory of food processors.
4. Maintain program uniformity and continuity.
5. Serve as liaison between the Food & Drug Administration and the U.S. Department of Agriculture and other governmental agency in areas where food is in interstate commerce.
6. Maintain close liaison with county and city officials, citizens' groups and community leaders.
7. Provide a list of food processing plants to local public health agencies.
8. Document complaints regarding FDA-regulated products and complete the E6.37C "Food Product Complaint" form.
9. Conduct sanitation inspections on food processing plants to determine compliance with Chapter 196, RSMo 1986.
10. Provide assistance and training to LPHA personnel.
11. Maintain inspection and investigation records for enforcement purposes.
12. Prepare work order(s) when major violations of public health significance are found.
13. Embargo food products when found to be adulterated or misbranded.

Duties of Local Public Health Agency

1. Assure food is not adulterated by performing Current Good Manufacturing Practice (CGMP) inspections on food processing plants designated by state as local agency responsibility.
2. Enforce local ordinances and codes relating to CGMP.
3. Request assistance from regional staff for work orders and closing orders as outlined in Chapter 3.2: Food Protection Guidelines and Closing Order Procedures.
4. Document complaints regarding FDA-regulated products and complete the E6.37C "Food Product Complaint" form (hyperlink). Once completed this form shall be forwarded to DHSS Food Protection Program Coordinator.
5. Complete appropriate forms when conducting inspections, E6.07 "Sanitation Observation" and DH-50 "Change Order" when required.

Inspection Process
Priority for inspections is based upon numerous factors, such as, the history of the food processing plant, consumer complaints, facility size, if the plant handles one or more of the eight major food allergens (dairy, wheat, egg, soybean, fish, peanuts, tree-nuts and crustaceans-which is shrimp, crabs and lobster), if the plant has been implicated in a food-borne disease outbreak, if the plant is serving a large population, the industry is designated as a high risk industry (such as bottled water) and/or if the plant is processing a potentially hazardous food.

A CGMP inspection, using 21 CFR Part 110 (hyperlink) as a guide, includes personnel, plants and grounds, sanitary operations, sanitary facilities and controls, equipment and utensils, processing and controls, and warehousing and distribution.

Personnel: Disease Control; Cleanliness (bare hand contact is allowed); Education and Training and Supervision

Plants and Grounds: Grounds; Plant Construction and Design

Sanitary Operations: General Maintenance; Substances used in Cleaning and Sanitizing; Storage of Toxic Materials; Pest Control; Sanitation of Food Contact Surfaces; and Storage and Handling of Cleaned Portable Equipment and Utensils

Sanitary Facilities and Controls: Water Supply; Plumbing; Sewage Disposal; Toilet Facilities; Hand-washing Facilities; and Rubbish and Offal Disposal

Equipment and Utensils: Easily Cleanable; Thermometers for Freezers and Coolers; Instruments Accurate and Maintained (temperature, pH and water activity); and Compressed Air

Processing and Controls: Raw Materials and Other Ingredients; and Manufacturing Operations (45° F for refrigerated foods; 140° F for hot foods)

Warehousing and Distribution: Protect against Physical, Chemical, Microbial Contamination; and Protect against Deterioration of the Food and Container

Inspection Guidelines

- Unannounced inspections are preferred, however, announced inspections are acceptable in situations such as, new establishment, follow-up inspection and seasonal/part-time operation.
- Inspections on manufacturing or packaging plants should occur when the plant is actively processing.
- Upon arrival, inspector shall present credentials to the most responsible plant official.
- Generally a plant representative will accompany inspector during the inspection.
- CGMP inspections are to be recorded on the E6.07 - "Sanitation Observation" or local agency equivalent form.
- Exit interview with plant representative.

Documentation

- Document the legal corporate name, not just the name the plant is operating under.
- Document the most responsible plant official (name and title).
- Document the plant representative that accompanied you during the inspection (name and title).
- During the inspection, document the plant's hours/days/season of operation.
- Number your observations. State observation and give recommended corrective actions.
- Document date of follow-up, if needed.
- Leave the original (white copy) with the plant.

OTHER AGENCIES TO BE CONTACTED

U.S. Food & Drug Administration (FDA) Lenexa, Kansas
U.S. Department of Agriculture (USDA) Lawrence, Kansas
MO Department of Natural Resources - Water Pollution Control Program
- Solid Waste Management Program

REFERENCE MATERIAL

E1.20 - State Laws Accompanies by Department of Health and Senior Services Rules and Administrative Guidelines Governing the Manufacture and Sale of Foods
E1.23 - Warning Against Removal of Embargoed Goods (Tag)
E1.24 - Work Order
E1.26 - Closing Order
E6.07 - Sanitation Observation
E6.11 - Goods Embargoed or Condemned as Unfit for Human Consumption
E6.11A - Goods Embargoed or Condemned as Unfit for Human Consumption Worksheet
E6.37C- Food Product Complaint
DH-50 - Change Order

STATUTORY OR REGULATORY AUTHORITY

Chapter 196 RSMo 2000