



# Good Manufacturing Practices Writing Guidance Document

Good Manufacturing Practices (GMPs) are a generic overview of plant-wide sanitary practices and requirements. GMP training is typically the very first training all new employees receive. With that in mind, these requirements must present very clear and broad-reaching food safety practices and requirements. GMPs apply to all people (employees, inspectors, visitors, contractors, etc.) that enter portions of the plant considered to be "GMP Zones." All employees must be trained (training must be documented) in the plant's GMP requirements. Contractors and visitors who will go into GMP Zones must attest to understanding the requirements via signature or be subject to training. Everyone must demonstrate an understanding of requirements before going into GMP Zones. **Note:** Sanitation standard operating procedures (SSOPs) are more plant-specific requirements of various processes and will be covered separately.

## Example of an intro to the document:

"All GMPs must be followed on an ongoing, daily basis to ensure the safety and quality of our product. All those trained in GMPs are expected to help encourage others to follow GMP requirements if they observe any deviation from the requirement. Purposeful failure to comply with this GMP policy will result in disciplinary action that may include a verbal warning, a written warning, suspension without pay, or termination, depending on the severity and/or frequency of non-compliance.

### **Food Safety and Quality**

Maintaining food safety and quality is everyone's job. Report any food safety or quality problems to a supervisor or manager."

#### **GMP Zones**

GMP zones are production areas where ingredients, packaging, or finished products are at higher risk for potential contamination. GMP zones must be marked and, at a minimum, include all production and packaging areas where there is exposed product. "Grey areas" such as, specific cooler areas e.g., loading/unloading zones, and packaging material storage areas, are all locations that must be defined by the plant as "GMP" or "non-GMP" zones for personnel to understand the requirements (e.g. "Must I/Can I wear a frock in this area or not?) in those transition areas. GMP zones, at a minimum, are active during production or when exposed product, ingredients, or packaging is present.

### Personnel/Hygiene

This section, done in collaboration with Human Resources, will communicate requirements for sick employees with infectious illnesses who are not to come to the workplace. Infectious disease, open and/or infected wounds must be reported to the supervisor, and personnel with such conditions must not be allowed near food production, equipment, etc., and in some cases may require a doctor's note to RETURN to work. Gloving requirements regarding cuts/abrasions and other minor open wounds must be clearly stated in this section too.

### **Sanitary Practices**

This section will point out plant measures to reduce/eliminate the risk of adulteration of products due to outside factors brought in by employees and others entering GMP zones.

<u>Outer clothing requirements</u>: to avoid unsanitary outer clothing in production areas (hairnets, frocks, proper shoe-wear, etc.). These requirements must also outline requirements around when to change out hairnets/frocks, and where they can and cannot be worn (e.g. hang frocks in gowning areas and reuse if not overly soiled, frocks are not allowed in bathrooms or outside premises, if they do end up in a bathroom do not wear out to the floor until properly laundered).

:, at minimum always wash hands upon exiting bathrooms and entering production areas. In addition, hands must be washed when going from handling non-food contact items/surfaces to handling product or food contact items/surfaces. Gloves are not a substitute for good handwashing practices. Gloves are required in ready-to-eat processing rooms when directly handling products, etc.



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<u>Food, Drink, and Personal Items</u>: plants must articulate their policies regarding: food, drink, and medication restrictions to authorized break areas and offices only (no smoking, tobacco, gum, candy, etc.), no jewelry, nail polish, false eyelashes, no cell phones (or only those authorized by supervisors/managers for work purposes). No food kept in break areas, or outside of refrigerators overnight (pest control). Storage of personal belongings (food/medications) cannot be in the same space as production equipment/clothing (e.g., you do not want an ibuprofen pill hitchhiking into production in a knife scabbard and finding its way into your trim).

## **Equipment**

This section outlines the employee's responsibility for sanitation and inventorying of personal production equipment. This must also note who to report to if equipment goes missing to ensure it does not end up in the product (e.g. in a combo/lug of trim about to go into a grinder).

### **Processing Operations**

This section will cover notification of employees, guests, and visitors of the policies regarding the actions to follow and who to contact in the plant if the product is believed to have been processed under unsanitary conditions. Note that at-risk products will be tagged and reviewed for rejection, treatment, or further processed to eliminate the threat.

### **Environment**

This section will outline basic grounds, litter and trash requirements, and the need to keep areas neat to avoid pest control issues. This also includes regular maintenance and upkeep to ensure cleanliness can be reasonably maintained. Areas must be well-lit and ventilated to avoid other food safety risks and lighting must be designed in such a way to avoid widespread product adulteration in the event a light is broken.

## **Food Defense / Plant Security**

Expressing food defense/plant security requirements within the GMPs is also a suitable location for training all that will have access to the exposed product, packaging materials, and equipment. This section is best utilized to encourage all to report any signs of product tampering, suspicious vehicles, or people within the production areas as well as any activity that appears suspicious, especially concerning product tampering or contamination. Specify who the activity must be reported to within this section as well.

#### **Tours/Visitors**

Although plants may have a separate tour/visitor SOP, placing minimal visitor procedure requirements within the GMPs is a great spot to ensure the "bare minimum" requirement is covered. This allows employees to understand that this is a secure facility and there is a level of control and requirement for all those entering the facility.