



United States Department of Agriculture

One Team, One Purpose



Food Safety and Inspection Service

Protecting Public Health and Preventing Foodborne Illness



IFTPS 2021: FSIS updates

Jonathan Huang, Ph.D., CFS
Thermal Processing Specialist
Office of Policy and Program Development
Food Safety Inspection Service, USDA

Food Safety and Inspection Service: Background

- 2020, increased demand for canned products
- Establishments extend their operation hours to meet the demand
- How effective sanitation is to be maintained
 - Vital to product wholesomeness
 - Essential foundation for HACCP systems

Food Safety and Inspection Service: Frequently asked questions

- Do I have to clean up my facility every 24 hr? Can we extend the running time between clean-ups?
- What is the requirement for less than daily (LTD) Sanitation?
- How can I develop the LTD sanitation procedures?

Food Safety and Inspection Service: Frequently asked questions

- Do I have to clean up my facility every 24 hr?
 - No. As a common practice, establishments conduct complete cleaning and sanitizing of their operations on a daily basis. FSIS IPP perform pre-op inspection at certain frequency. However, there are no FSIS regulations that require an establishment to conduct a complete cleanup every 24 hours or within any other specified period.
 - LTD sanitation is the complete cleaning of equipment and production areas at a frequency of less than daily (i.e., less frequently than every 24 hours of operation).

Food Safety and Inspection Service: Frequently asked questions

- Can a canning establishment use LTD sanitation procedures to replace its current daily sanitation procedure?
 - Yes. FSIS regulations do not specifically require daily sanitation. Processing operations, including canning establishments, can utilize LTD sanitation procedures provided they ensure that, as a result of the methods utilized, insanitary conditions are not being created that may result in adulteration or contamination of product.

Food Safety and Inspection Service: Frequently asked questions

- What are the requirements for LTD Sanitation?
 - The sanitation regulatory requirements in 9 CFR 416 (SPS and SSOP)
 - LTD sanitation procedures are to be incorporated into the establishment's HACCP system (e.g., HACCP plan, Sanitation SOP or other prerequisite program).
 - Consider the effect of LTD sanitation frequency on the HACCP system and support the decisions made in the hazard analysis (9 CFR 417.5(a)(1)).

Food Safety and Inspection Service:

Frequently asked questions

- Considerations in developing LTD sanitation procedures?
 - [FSIS Less than Daily Sanitation Procedures Compliance Guideline](#)
 - Risk considerations, i.e., pathogens, chemicals, allergens, sanitation requirements, lot size or recall implications, consistency of operation and potential impact on product.
 - Collect and analyze meaningful data (i.e., baseline) to evaluate and maintain the effectiveness of Sanitation SOP, including LTD sanitation procedures.
 - Documentation/records.

Food Safety and Inspection Service:

Notes

- The concept of LTD sanitation is relative to traditional daily sanitation – pre op sanitation.
- LTD is not a substitute for effective operational sanitation, e.g., removing gross contamination, water rinsing, applying sanitizer, etc.
- There is no specific requirement for the establishment to perform daily cleaning of NFCS. The minimal requirement for NFCS is provided in in 9 CFR 416.4.

Food Safety and Inspection Service:

Notes

- Microbial hazard is the main concern, but not the only thing that should be considered. Sanitation SOP must be sufficient to prevent direct contamination or adulteration of product(s).
- If product contamination occurs, it triggers the corrective action requirements (9 CFR 416.15). LTD or not does not matter.

Adulterated.

(3) If it consists in whole or in part of any filthy, putrid, or decomposed substance or is for any other reason unsound, unhealthful, unwholesome, or otherwise unfit for human food;

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Questions



Jonathan Huang, PhD, CFS,
Thermal Processing Specialist,
Food Safety and Inspection Service, USDA
Phone: (402) 344-5000 | jonathan.huang@usda.gov

Food Safety and Inspection Service:

References

Regulatory Compliance:

- [Less than Daily Sanitation Procedures Compliance Guideline](#)

FSIS Directives

- [5000.5 Verification of Less Than Daily \(LTD\) Sanitation Procedures In Processing Operations-Revision 2](#)

Federal Registers

- Final Rule: [Pathogen Reduction; Hazard Analysis and Critical Control Point \(HACCP\) Systems \(1996\)](#)