

## MANAGEMENT STRUCTURE

Owner/Plant manager or designee

The Owner/Plant manager or designee are responsible for implementing and daily monitoring of Sanitation SOP and recording the findings and any corrective actions. The Owner/Plant manager or designee are responsible for training and assigning specific duties to other employees and monitoring their performance within the Sanitation SOP, including Halal-specific requirements. All records, data, checklists, and other information pertaining to the Sanitation SOP will be maintained on file and made available to USDA inspection personnel.

### I. Preoperational Sanitation – Equipment and Facility Cleaning Objective

A. All equipment will be disassembled, cleaned, and sanitized before starting production, with additional steps for Halal processing to ensure no cross-contamination from non-Halal residues.

1. Establishment sanitary procedure for cleaning and sanitizing equipment.
2. All equipment will have product debris removed.
3. Equipment will be rinsed with water to remove remaining debris.
4. An approved cleaner will be applied to equipment and properly cleaned. For Halal processing, cleaners must be verified as free from alcohol or animal-derived ingredients prohibited under Islamic law (e.g., no pork-derived enzymes).
5. Equipment will be sanitized with approved sanitizer (e.g., chlorine-based or other USDA-approved options verified as Halal-compliant) and rinsed with potable water. The equipment is reassembled.
6. Halal-Specific Procedure: If equipment was previously used for non-Halal products (e.g., pork or non-ritually slaughtered meat), perform a triple-clean cycle: clean, rinse, sanitize, and verify via organoleptic inspection to confirm absence of contaminants.
7. Implementing, Monitoring and Recordkeeping

The owner/Plant manager or designee perform daily organoleptic sanitation inspection after preoperational equipment cleaning and sanitizing. The results will be recorded on a Preoperational sanitation form. If found to be acceptable, the appropriate line will be checked. If corrective actions are needed, such actions will

be documented. The tenderizer and grinder will be inspected for damaged or missing metal parts.

Halal-Specific Monitoring: For Halal runs, document verification of Halal-compliant cleaners/sanitizers and segregation on the form. Include a checkbox for "Halal Equipment Validation" to confirm no cross-contamination risk.

#### 8. Corrective Actions

The Owner/Plant manager or designee determines that the equipment on hand does not pass organoleptic examination, the cleaning procedure and inspections are repeated. The Owner/Plant manager or designees monitor the cleaning of the equipment on hand and retrain employees if necessary. Corrective actions are recorded on Preoperational sanitation forms.

Halal-Specific Corrective Actions: If cross-contamination is suspected (e.g., residue from non-Halal processing), retain affected equipment, repeat the triple-clean cycle, and retrain staff on Halal segregation. Document any product retention to prevent adulteration.

#### B. Cleaning of Facilities.

##### 1. Cleaning procedures:

Debris is swept up and discarded.

Facilities are rinsed with potable water.

Facilities are cleaned with approved cleaner (Halal-compliant for Halal areas).d.

Facilities are rinsed with potable water.

##### 2. Cleaning of floors and walls are done at the end of each production day. Ceilings are cleaned as needed.

Halal-Specific Procedure: Designate Halal processing zones if co-processing occurs. Clean these zones first or separately to avoid non-Halal runoff

Establishment monitoring

The Owner/Plant manager or designee performs daily organoleptic inspection before operation begins. Results are recorded on a preoperational sanitation form.

##### 3. Corrective action

When the Owner/Plant manager or designee finds that the facilities do not pass organoleptic inspection, the cleaning procedures, and inspections are repeated.

The owner/Plant manager or designee inspects the cleaning of the facilities and re-trains employees as needed. Corrective action to prevent direct product contamination or adulteration are recorded on Pre-operational sanitation forms.

Halal-Specific Corrective Actions: If facilities fail Halal validation, isolate the area, perform enhanced cleaning, and verify before resuming Halal production.

## II. OPERATIONAL SANITATION—EQUIPMENT AND FACILITY CLEANING OBJECTIVEA.

Processing is performed under sanitary conditions to prevent direct and cross contamination of the product, with enhanced measures for Halal products to comply with religious dietary laws and USDA exemptions for ritual slaughter.

### 1. Sanitary procedures for processing.

Employees clean and sanitize hands, gloves, knives, other hand tools, cutting boards, etc., as necessary during processing to prevent contamination of products.

For Halal processing, employees must perform hand washing and gloves/tools must be dedicated or sanitized between non-Halal and Halal use.

All equipment tables and other product contact surfaces are cleaned and sanitized throughout the day as needed. When employees leave processing area. Outer garments are maintained in a clean and sanitary manner and are changed at least daily and more often if necessary.

Once daily, the tenderizer and grinder will be disassembled and inspected for damaged or missing metal parts. The results of this procedure will be documented on the Operational Sanitation Form.

Clean and then sanitize (with 180°F water or another approved sanitizer), knives and other hand tools, saws, and other equipment, as often as necessary.

When insanitary conditions are found, the implicated product will be retained, the insanitary condition will be addressed, and the appropriate corrective actions will be implemented.

Halal-Specific Procedure: Process Halal products first in the day or after full sanitation if following non-Halal runs. Use dedicated lines/tools for Halal to avoid cross-contamination. Label and segregate Halal products immediately with clear markings. Prevent contact with alcohol-based sanitizers unless verified Halal-compliant.

## 2. Monitoring and Recordkeeping

The owner/Plant manager or designee are responsible for ensuring that employees' hygiene practices, sanitary handling procedures and cleaning procedures are maintained. The owner/Plant manager or designee monitors the sanitation procedures during the day. Results are recorded on an Operational Sanitation Form daily.

Once daily, the tenderizer and grinder will be disassembled and inspected for damaged or missing metal parts. The results of this procedure will be documented on the Operational Sanitation Form.

## 3. Corrective Action

The owner/Plant manager or designee identifies sanitation problems and stops production if necessary and notifies processing employees to take appropriate action to correct sanitation problems. If necessary, employees are retrained and corrective actions are recorded on Operational Sanitation form.

Halal-Specific Corrective Actions: If cross-contamination occurs (e.g., non-Halal contact), retain and condemn affected product as non-Halal. Stop Halal line, sanitize thoroughly, retrain staff, and notify certifying body if applicable. Document all actions to ensure traceability.