In the November/December 2011 issue, I wrote an article called “Inspection Checklist Syndrome,” which discussed the shortcomings of using a checklist to do a general GMP/sanitation inspection in a food plant. I was trying to convey that using a narrowly focused checklist allows many missed opportunities to discover actual or potential issues within food plants. I stand by my original thoughts on the subject, but feel it is important to share another side of this issue.

My job requires that I fly to just about every assignment I have. Sometimes I fly great distances to China, while other trips are to nearby regional areas. Regardless of the size of the aircraft or the destination, I am extremely grateful that the pilots conduct their pre-flight inspection of the craft using a checklist. This list has been developed over the years from experiences with the aircraft and general good aviation practices to protect the safety and well-being of the passengers.
Does this system ever fail? Personally, I would rather not dwell on the rare occasions where it failed to detect an issue, but in those instances the pilot had confidence in the system’s ability to function before it started, otherwise the aircraft would not have passed inspection.

This same principal needs to be applied in the food industry. Just like the importance of checking on critical functions and systems before a plane takes off, the same system should be in place when starting up a processing system. Who knows what could have happened from the time you left the equipment at the end of your shift until the time you returned to resume production. It has likely been through sanitation procedures, maintenance repairs, and idle time. That is a considerable amount of time outside of your direct control where something could have happened.

A checklist that provides a specific focus on a piece of equipment or system is a valuable tool. It establishes the expectation of looking for and highlights the important things to look for to help prevent very costly incidents.

Too often, underlying risks with food manufacturing systems are ignored until an event happens. This is unfortunate and short-sighted since there are enough reported incidents to thoroughly convince us of the benefit of inspecting our systems before turning them on. A pre-start-up list can include several other considerations besides sanitation and proper assembly. For example, you could include verification that the operational settings are correct from the start, instead of simply adjusting them as you go. This would likely save product, increase yield, and reduce issues with components down the line. Use a list to verify you have taken care of all of the important items that experience and history with the system have told you to check. If a problem develops, you will be starting from a known point and will save time finding a solution.

**THE PRE-START-UP CHECKLIST.**
Regardless of how simple or complex a system is, there is always a chance that something could go wrong. This is where a pre-start-up checklist would be a significant benefit. Ask:
- Have all product contact areas been properly cleaned?
- Have all tools used for sanitation or maintenance been removed?
- Is all equipment that was removed for cleaning put back in place and properly aligned?

Everyone likely has a story about how they started up a system and a pipe connection wasn’t secured, a transfer sleeve was not reinstalled, or drains were left open to spill hundreds of gallons of material onto the floor and down the drain. The list of items to verify as correctly completed could be quite long or short. Each plant will have to decide what is important for operation, and add the items to its list.

What could be more important than verifying that an allergen cleaning has been properly conducted on a system? There is always a chance that one element of the system was overlooked or not properly cleaned to remove the risks for allergen contamination.

This is particularly true when you are pressured for time and rushed to get production up as fast as possible. Using a checklist to verify that everything is ready to go when the program demands it be used, affords you a level of safety and consumer protection. This should be a non-negotiable issue.

Maintenance often receives quite a bit of heat when things go wrong in the production area after systems have been worked on. Things get overlooked, perhaps equipment was not tightened as it should be or someone soiled a food contact surface without realizing it. Assuming that others will take care of items, rather than doing them ourselves, can lead to failure. A post-maintenance checklist can assist in avoiding many of these issues. Was the system restored to working condition? Did we drain a component that needs to be refilled before production can start? How many parts are left over after a piece of equipment was disassembled? Is everything put away properly?

**LITTLE THINGS: BIGGEST ISSUES.**
It might seem that some of these simple issues don’t need to be included on a list, but experience tells me that it is the little things that often result in the biggest issues. The inevitable question is asked in nearly every event, “Why wasn’t that taken care of before we started?” And in almost every instance, the answer is, “I forgot,” “I thought someone else took care of that,” or “I didn’t check it.”

It is extremely important that pre-start-up checklists become a mandatory element of your programs. The biggest issue to guard against is complacency. People tend to get to a point where they think they have the checkpoints memorized and stop using the list. They reason that they will just fill it out later when they have more time. However, as with all other required documentation, from lot number recording to metal detector verification logs, these documents must be taken seriously.

I continue to believe that checklists used for a general inspection of a food plant limit the ability to do as thorough and detailed job as you could, because they restrict you to only looking for specific issues. However, on the other hand, a checklist developed for a specific function to verify that critical issues have been taken care of before equipment is placed into use is indispensable.

Just as pilots understand their responsibility to get passengers to their final destination, the food industry has to have the same attitude toward protecting our customers from harm and ensuring our systems are ready to fly.

The author is Head of Food Safety Education, AIB International.
AIB has been a leader in providing independent food safety inspection, audit, and educational services to industry for over 60 years.

In recent years, with the rise of the Global Food Safety Initiative (GFSI) audit schemes, and with the passage of the 2011 Food Safety Modernization Act, AIB’s distinctive ability to provide thorough facility inspections has become more important than ever before. Many have chosen to continue with the full AIB GMP Inspection, often in conjunction with a GFSI audit.

However, others have requested that we develop an evaluative product that will be additive to their food safety program and not duplicate audit elements found elsewhere.

FS•360 is derived from the core elements of the AIB Consolidated Standards for Inspection.

It is guided by two critical sections of the Food, Drug and Cosmetic Act of 1938:
- Section 402 (a)(3)
- Section 402 (a)(4)

SCOPE AND CHARACTERISTICS

The scope of the FS•360 evaluation within a facility will be determined by the client through prior discussion with AIB. The visit typically will be announced.

FS•360 is intended to be consultative and educational in nature. It is recommended a facility be down, or at least partially down. After an AIB International FS•360 has been completed no score or laudatory terminology will be given.

Report-writing will be kept to a minimum, unless otherwise requested by the client. Typically records will not be reviewed. The intent is to maximize the floor time spent by the AIB expert during his/her visit.

FS•360 can be used in a free-standing manner or complementary to other audits, including the GFSI schemes or extending the scope of the AIB Consolidated Standards to really challenge your GMPs. Its entire focus is a detailed probe of facility on-floor food safety practices. After all, this is where the food is produced.

Contact us today!
800-633-5137 or jlazaro@aibonline.org

www.aibonline.org