

USDA CONTRACT RESPONSIBILITIES SYNOPSIS

PLANT SURVEYS

- USDA Plant Survey performed annually by USDA supervisors.

SANITATION INSPECTIONS

- Conduct pre-operational sanitation inspection with plant personnel to ensure equipment is in sanitary condition prior to daily production start-up.
- Create daily sanitation reports that document the history of sanitation issues, including responses provided by the contractor.
- USDA AMS Inspectors are present during the entire production day, monitoring in-process activities and documenting sanitation deficiencies as they are observed and notifying the contractor when corrective actions are needed and the time the deficiency has been corrected. If/when critical sanitation issues are found, DLA Troop Support is notified, and USDA Certification of production is withheld until corrective action is satisfactory.
- When needed, sanitation issues are coordinated with other government agencies, including USDA, FSIS; FDA; and United States Department of Commerce (USDC), National Marine Fisheries, as appropriate.
- When applicable, the inspector is present to observe any rework activity associated with a foreign material incident.
- Integrated Pest Management (IPM) Program is monitored to ensure no rodents /pests are present which could contaminate ingredients/raw materials/ products which may not be detected after production.

IN-PLANT INSPECTION ACTIVITIES

- In-plant inspection allows for monitoring of all aspects of production (in-process activities) and provides the highest level of assurance that the entire lot of finished product will perform as expected by the end-user (troops).
- Most operational ration (OR) products produced under In-plant USDA Inspections have a QSP requirement. USDA Inspectors audit the contractor's QSP by performing Audits of all 13 areas of the QSP and provide a monthly summary of the areas that have been audited and any Corrective Action Requests issued because of those audits. This evaluation of a contractor's system helps ensure that the contractor is adhering to their QSP, requires corrections if/when the plan is not being followed, and can lead to improvements in the serviceability of covered OR products for the troops.
- Ensure that proper sanitation and Good Manufacturing Practices (GMP) are maintained throughout production, e.g., if clean-up overspray from one area contaminates other equipment, this issue would be corrected before proceeding. Prevents build-up of unsanitary conditions during production.
- Ensures employees maintain appropriate personal hygiene. Perform sanitation checks and present during production to verify compliance to GMPs.
- Present during production to verify formulation, filling, and sealing of the products, and processing of the products in accordance with the current contract requirements.
- Present during production to verify ingredients are stored under sanitary conditions and are free of beetles, other insects, or other pests or contamination. Notify DLA Troop Support if/when infestations are identified and provide updates on corrective actions and notify

DLA Troop Support when insects have been eradicated. Segregation of ingredients to address allergen concerns is verified during plant the daily "rounds".

- Sample production lots representatively during the entire production day. Considers production schedule, such as delays and/or intermittent down-time.
- Maintain skip-lot ledgers for both end-item skip-lot (as applicable) and analytical skip-lot (as applicable), with current day's production information to establish which lots will need to have verification inspection and/or testing performed later. These procedures allow for reduced frequencies of production lot inspections and provides some cost-saving when these procedures are implemented, and the contractor has an acceptable quality history.
- Monitor rework activity to ensure rework plan is being performed as stated. Observe product that has been placed on hold to ensure that the non-conforming product is not inadvertently reintroduced into the final lot being procured by DLA Troop Support.

IN-PLANT INSPECTION

- Submittal of analytical tests to the USDA/AMS National Science Laboratory is performed daily after the production day has ended.
- When certain criteria are met regarding availability of required test equipment, etc., USDA Inspectors in-plant can perform analytical tests for some requirements found in the specifications, such as oxygen content, water activity, moisture content, and residual air. In-plant USDA testing can provide a cost savings and faster turnaround for results.
- During daily activities, if Food Defense vulnerabilities are observed, USDA will report this information to the DLA Troop Support Auditing Branch, who is the party responsible for monitoring Food Defense.
- Submit Periodic Review samples to Natick and meet with the contractor to review production samples rejected by Natick and document this follow-up review so that the product can potentially be improved to meet Natick's expectations. Also, perform QSP audits to observe the contractor's Product Exams being performed to determine if the issues identified by Natick are being overlooked during their exams.
- On-site inspection facilitates knowledge sharing and understanding by contractors (especially new contractors) of DLA contract requirements and contractor responsibilities.
- The Contractor can ship finished product faster when USDA is sampling the lot as it is being produced. USDA can certify the product as soon as the lot has passed all inspections. In some cases, certification can be accomplished within a few days if the Contractor produces under Higher Level Contract Requirements and the lot is selected for End-Item and Analytical Skip-lot.

FOOD SAFETY, FOREIGN MATERIAL, AND PROCESS DEVIATIONS

- DLA Troop Support recommends that the contractor notify the USDA immediately when a food safety and foreign material issues is identified.
- USDA monitors the incident and corrective actions steps taken and documents observations on the daily sanitation report, such as a verification that the affected area has been cleaned and sanitized to maintain GMPs.
- USDA reviews contractor's corrective actions and provides acceptability determination for consideration by the contractor and FTR if/when the lot is offered for acceptance by DLA Troop Support.
- USDA reviews contractor's notifications to Regulatory Agencies when that action is required for Food Safety and Foreign Material issues.

- USDA monitors processing activity and reviews Thermal Process Deviations and other Deviations from the Contractor's Critical Control Points (CCP). USDA reviews this information with the USDA Supervisor or Operational Rations Section. Operational Rations Section contacts the applicable Regulatory Agencies when additional review and oversight is needed.