



To: All QAD personnel providing shell egg grading services
From: Jeff Hendricks
National Shell Egg Supervisor
Subject: Amendments to QAD 705

The following amendments to QAD 705 are being issued as a superseding policy memo until such time as the amendments can be incorporated into the full QAD 700 Shell Egg Graders Procedures document.

These passages are being amended to reflect changes to FDA interagency referral reporting procedures based on recent reviews and meetings with FDA personnel.

QAD 705.1c Pre-Operative Sanitation Inspections is amended as follows:

Pre-operative inspections of equipment and facilities are to be completed at all official plants regardless of the type of grading performed. Graders will be responsible for conducting these pre-operative inspections prior to the start of operations. For scheduled or unscheduled plants, pre-operative inspections are to be conducted prior to each day of grading service. Grading activities at unscheduled plants should be planned so that the pre-operative inspection can be completed prior to startup of operations. If scheduling cannot be adjusted accordingly, the unscheduled plant has the option to proceed with processing of non-shielded product and, prior to official grading, cease processing, change the wash water, and complete a thorough cleaning of all critical items listed on Form LP-74: Pre-Operative Shell Egg Plant Sanitation Report (Exhibit I). After cleaning, the grader will conduct an inspection and determine if the equipment meets established sanitation requirements.

The time allotted for pre-operative inspections is based on the condition of the plant, the number of processing machines, and the plant's sanitation history. As a guideline, a minimum of 30 minutes prior to start-up should be appropriate. Upon approval by USDA, AMS supervision, and notification to the Regional Office, additional time may be authorized when it is deemed necessary to assure sanitation compliance. Regardless of the time allotted, plants are to be billed for this additional time unless the grader's tour of duty can be adjusted to include the pre-operative inspection.

When conducting pre-operative inspections, [the machine should be fully open and accessible for inspection. Disassembled components such as filters, screens, or panels should be placed on a sanitary surface such as a clean plastic pallet and never directly on the floor. Always start inspection with the critical areas and as such the cleanest areas first before inspecting the non-critical areas. The following inspection sequence is suggested:](#)

1. Loaders and accumulators
2. Washer compartments, filters, nozzles, brushes, and spray sanitizers
3. Egg drying equipment, including air filters
4. UV sanitizers and Egg oiling equipment (if applicable)
5. Mass scanning equipment and scales
6. Undergrade egg removal chutes and lines
7. Egg carriage systems
8. Packing and packaging equipment
9. Farm belts
10. Processing rooms
11. Coolers and storage areas
12. Bathrooms and common areas
13. Outside premises and refuse handling areas

Alternatively, equipment that needs additional time to prepare for operations after inspections (i.e. the farm belts bringing egg to the accumulator) may be assessed first. Graders should always be aware of potential cross contamination and follow each plant's recommended policies for washing hands and or wearing disposable gloves when conducting sanitation inspections.

USDA identified eggs may only be graded and certified once:

1. All critical components are satisfactory,
2. All non-critical areas are either satisfactory or have a plan to be corrected by next processing shift, and
3. All complex issues that have been approved for additional time to correct are on schedule.

If these conditions are not met or if conditions during processing do not remain reasonably clean, graders must withhold certification. Eggs produced on equipment or in facilities not meeting these requirements must be retained and reprocessed before they may be certified.

A minimum of twice per year, supervisors must accompany graders on pre-operative inspections to determine the thoroughness of the inspection and assure uniformity in applying inspection criteria. Additionally, supervisors are to review sanitation reports completed the previous visit to assess the plant's overall sanitation compliance and determine if any additional action is needed.

Graders in facilities with frequent sanitation non-compliances resulting in either processing delays or withholding of USDA certification must contact their supervisor for guidance. Supervisors should accompany the grader on a pre-operative inspection and discuss observations with plant management to obtain corrective and preventative action. Supervisors should also be in contact with the Regional Office who may consult with the National Shell Egg Office to determine any

additional actions in accordance with the regulations.

QAD 705.1f Recording Results is amended as follows:

Results of each pre-operative inspection are to be recorded on Form LP-74. All sanitation deficiencies are to be documented in the “Remarks” section of the form. List each specific deficiency, the management official contacted, the corrective action taken, and when the action was taken. Items identified as noncritical on the Form LP-74 may be re-classified by the grader as critical when unsatisfactory conditions are of such magnitude as to constitute a serious health hazard or as a result of gross negligence. Graders are to discuss all non-compliances with the designated management official and request that they acknowledge the discussion by initialing the form. If the designated official refuses to initial the form, the grader is to document the individual's name on the form. Sanitation problems occurring during the production shift must be recorded in the comments log of Form LP-75 when they are observed.

When a deficiency is a noncritical item that requires a significant amount of time to properly repair or completely correct, but action has been taken to assure general sanitary conditions are maintained, the minimum corrective action and projected completion timeframe stated by plant management must be recorded. When the corrective action is completed return to the initial documentation on the Form LP-74 to record closure of the non-conformance items. When keeping track of corrective actions for unsatisfactory findings, it may be helpful to highlight correction dates or use different color ink.

Alternatively, a reference on the current Form LP-74 and corrective action can serve as appropriate documentation. In the event that plant management cannot complete the corrective action in accordance with the established timeframe, contact the immediate supervisor for guidance. Exhibits II and III are examples of the proper way to document sanitation deficiencies on Form LP-74.

~~If a specific, detailed sanitation violation occurs in the same location (the same item listed on Form LP-74) for three consecutive days and presents a risk of cross contamination to the eggs, the violations must be documented and reported to the supervisor, using the U.S. Food and Drug Administration's (FDA) Interagency Referral Report (QAD 703, Exhibit II). The shell egg grader must advise plant management of the necessity for issuing the report. Documentation on official sanitation reports (description of detailed violation and name of plant management notified) must support this action.~~

The following is an example of documentation for a detailed recurring violation:

Monday—Adhering material (Fecal) observed on product contact surface area of packer head # 5, clamshells. (Disposition—Plant management (Susan Manager) corrected the affected area prior to start up).

Tuesday—Adhering material (Fecal) observed on product contact surface area of packer head #5, clamshells. (Disposition—Plant management (Susan Manager) corrected the affected area prior to start up).

Wednesday—Adhering material (Fecal) observed on product contact surface area of packer head #5, clamshells. (Disposition—Plant management (Susan Manager) corrected the affected area prior to start up).

A minimum of twice per year, supervisors must accompany graders on pre-operative inspections to determine the thoroughness of the inspection and assure uniformity in applying inspection criteria. Additionally, supervisors are to review all sanitation reports completed since the previous visit to assess the plants overall sanitation compliance and determine if any additional action is needed. Plants with a continuous history of sanitation non-compliances are to be referred to the Regional Director who may consult with the National Shell Egg Supervisor and Grading Services Branch Chief, to determine any additional actions in accordance with the regulations.