

Intro

Effective sanitation is the backbone of any Hazard Analysis and Critical Control Point (HACCP) program. While HACCP plans define where hazards exist and what critical limits must be maintained, it is the facility's day-to-day sanitation execution that determines whether those controls actually work.

Foodborne illness outbreaks, product recalls, and failed regulatory inspections are rarely the result of a flawed HACCP plan on paper. More often, they trace back to inconsistent sanitation execution: missed pre-operational checks, undocumented corrective actions, or employees without current food safety training being assigned to sanitation-critical tasks.

This HACCP Sanitation Checklist is designed to help food processing and CPG facilities close that gap. It covers the seven HACCP principles as applied to sanitation, along with practical verification tasks your team can use to confirm that controls are in place, personnel are qualified, and records are audit-ready.

#01 HAZARD ANALYSIS

The first principle of HACCP requires facilities to conduct a thorough hazard analysis, identifying biological, chemical, and physical hazards that could occur at each step of the production process if sanitation controls are absent or fail.

A hazard analysis is not a one-time exercise. As ingredients, equipment, processes, or regulations change, the hazard analysis must be reviewed and updated. Sanitation-specific hazards to evaluate include microbial contamination from inadequately cleaned food-contact surfaces, chemical residues from improper sanitizer concentrations, and physical hazards introduced by equipment in disrepair.

Facilities that integrate their HACCP hazard analysis with workforce data, tracking which employees are certified to conduct sanitation verification and whether those employees are actually scheduled at the appropriate control points, are better positioned to maintain continuous compliance.



CRITICAL CONTROL POINTS (CCPS) #02

Once hazards have been identified, HACCP requires the establishment of Critical Control Points, which are steps in the production process where a control measure can be applied to prevent or eliminate a food safety hazard. For sanitation programs, CCPs commonly include cleaning and sanitizing of food-contact surfaces, equipment, and the production environment between production runs or product changeovers.

Effective CCP monitoring requires:

- Clear assignment of sanitation tasks to qualified personnel
- Defined monitoring frequency and methods (e.g., visual inspection, ATP bioluminescence testing, chemical concentration verification)
- Documentation of monitoring results in real time, not reconstructed after the fact
- Immediate corrective action when monitoring indicates a CCP is out of control

Scheduling gaps, such as an untrained employee filling in for an absent sanitation team member or a sanitation step missed due to poor shift handoff communication, are among the most common sources of CCP failure. Workforce management systems that enforce qualification-based scheduling help prevent these gaps before they create compliance risk.

#03 PRE-OPERATIONAL SANITATION

Pre-operational sanitation, which involves cleaning and sanitizing the production environment before production begins, is a prerequisite program that directly supports CCP integrity. A failed pre-op inspection should trigger a documented corrective action and, where required, a hold on production start.

Pre-operational sanitation must address:

- All food-contact surfaces, including equipment, conveyors, slicers, mixers, and utensils
- Non-food-contact surfaces that could serve as harborage points for pathogens (e.g., equipment legs, overhead structures, drains)
- Sanitation chemical concentrations and contact times verified against SSOPs (Sanitation Standard Operating Procedures)
- Pest activity or evidence reviewed prior to production start

Documenting pre-op inspections by the individual who performed them, including the date, time, and any corrective actions taken, is essential for FDA inspections and third-party audits.



TRAINING AND CERTIFICATIONS #04

HACCP sanitation programs are only effective when the people executing them are properly trained. The FDA's Food Safety Modernization Act (FSMA) requires that individuals who perform preventive controls, including sanitation controls, have the education, training, or experience necessary to perform their assigned functions.

Employee training and certification requirements for sanitation roles typically include:

- Food handler certification or equivalent food safety training
- Facility-specific SSOP training for each piece of equipment and area of the facility
- Training on sanitation chemical handling, dilution, and safety
- Allergen awareness training, particularly for facilities managing multiple product lines
- Refresher training following any corrective action, recall event, or regulatory change

One of the most significant and most preventable HACCP compliance risks is scheduling an employee to perform sanitation verification tasks for which their training is expired or incomplete. Workforce management platforms that track certification status at the individual employee level and enforce those requirements at the point of scheduling give facilities a critical layer of automated compliance protection.

#05 CHEMICAL CONTROL

Sanitation chemicals, including cleaners, sanitizers, and disinfectants, must be used at verified concentrations to be effective. Overconcentration can leave chemical residues that constitute a food safety hazard; underconcentration fails to achieve the required antimicrobial reduction.

Sanitation chemical control procedures should address:

- Approved chemical lists with corresponding SDS (Safety Data Sheets) on file
- Documented dilution procedures and concentration verification methods (e.g., titration kits, test strips)
- Segregated storage for sanitation chemicals away from food, packaging, and ingredients
- Proper labeling of all chemical containers and spray bottles
- Employee training on chemical handling, PPE requirements, and emergency spill procedures

Concentration monitoring results must be logged at each use and reviewed as part of the HACCP record system.



ALLERGEN SANITATION #06

For facilities producing products with multiple allergen profiles, sanitation at product changeover is a critical control point in its own right. Inadequate allergen cleaning between production runs is one of the leading causes of undeclared allergen recalls, and undeclared allergens represent one of the most serious categories of food safety risk for affected consumers.

Allergen sanitation procedures must include:

- A documented changeover cleaning protocol specifying the sequence, methods, and verification steps required when transitioning between allergen-containing and allergen-free products
- Verification methods appropriate to the allergen (e.g., ELISA test kits or ATP swabbing for high-risk allergens)
- Clear scheduling of changeover sanitation tasks, assigned to qualified personnel familiar with the specific allergen protocol
- Traceability records linking changeover cleaning records to production lot numbers

Given that the FDA now recognizes nine major food allergens, including sesame (added in 2023), facilities should review their allergen control procedures regularly to ensure they reflect the current regulatory landscape.



#07 ENVIRONMENTAL MONITORING

An Environmental Monitoring Program (EMP) is the ongoing surveillance of the production environment for pathogen indicators (such as *Listeria* species) and sanitation performance indicators (such as aerobic plate count via ATP testing). A robust EMP validates that sanitation controls are achieving their intended purpose between production runs and over time.

Key EMP components include:

- Defined sampling zones (Zone 1: food-contact surfaces; Zone 2: non-food-contact surfaces near food; Zone 3: non-food-contact surfaces farther from food; Zone 4: areas outside the production environment)
- Sampling frequency and rotation schedules to prevent adaptation of target organisms
- Documentation of positive findings, corrective actions, and trend analysis
- Integration of EMP results into the HACCP hazard analysis and corrective action system

EMP findings should trigger a review of whether the sanitation personnel assigned to affected zones were qualified and whether all SSOP steps were completed as documented.



RECORD- KEEPING

#08

When sanitation monitoring indicates that a CCP is not under control, or when a pre-op inspection fails, EMP results are positive, or a sanitation deviation is observed, a documented corrective action must be initiated and completed before production continues or product is released.

Corrective action records must capture:

- The nature of the deviation and the affected CCP or sanitation control
- The immediate action taken (e.g., re-clean and re-sanitize, hold affected product)
- Root cause analysis and long-term corrective measures
- The individual responsible for executing and verifying the corrective action
- Sign-off by a qualified supervisory or food safety personnel

HACCP regulations require that corrective action records be retained for a minimum of two years and be available for regulatory review on demand. Facilities that maintain these records in a digital, searchable format, linked to the employees, shifts, and equipment involved, are significantly better positioned to demonstrate compliance during an FDA inspection or third-party audit.



#09 SANITATION SCHEDULING

Even the most detailed HACCP sanitation program will fail if the right people are not in the right place at the right time. Sanitation scheduling is a workforce challenge as much as it is a food safety challenge.

Common workforce-related HACCP sanitation failures include:

- Uncertified backfill: An absent sanitation employee is replaced by someone without current food safety or equipment-specific training
- Shift gap coverage: Sanitation tasks scheduled at shift change are missed because outgoing staff assume incoming staff will complete them
- Overtime fatigue: Sanitation verification quality degrades when employees are working extended hours without proper fatigue management
- Undocumented task completion: Sanitation steps are performed but not logged, creating a compliance gap even when the physical work was done

Indeavor's workforce management platform addresses these risks by enforcing qualification-based scheduling at the point of assignment, ensuring that only employees with current, verified training and certifications are scheduled to perform sanitation-critical tasks. Combined with real-time visibility into shift coverage, absence management, and task completion tracking, Indeavor gives food processing operations the workforce infrastructure their HACCP program requires.

Your Facility's HACCP Sanitation Checklist

Hazard Analysis

- Confirm that a documented hazard analysis is in place and reflects current ingredients, processes, and equipment
- Verify that biological, chemical, and physical sanitation hazards have been identified at each process step
- Ensure the hazard analysis has been reviewed within the past 12 months or following any process change
- Confirm sanitation hazards are linked to documented critical control points

Pre-Operational Sanitation

- Confirm pre-op inspection is conducted by a qualified employee before each production start
- Verify that food-contact surfaces, equipment, and utensils are cleaned and sanitized per the SSOP
- Check that pre-op inspection results are documented, including any failures and corrective actions taken
- Ensure drains, floors, walls, and overhead structures are included in the pre-op scope

Critical Control Points (CCPs)

- Verify that all sanitation CCPs are documented with defined critical limits, monitoring procedures, and responsible personnel
- Confirm CCP monitoring records are completed in real time and reviewed by a qualified supervisor
- Ensure corrective action procedures and documentation for each CCP
- Verify that CCP records are retained for a minimum of two years

Training and Certifications

- Verify that all sanitation personnel have completed facility-specific SSOP training for their assigned areas
- Confirm food safety certifications (e.g., PCQI, ServSafe, or equivalent) are current and on file
- Check that training records are documented and accessible for audit
- Ensure refresher training is scheduled following any corrective action or regulatory update
- Confirm scheduling enforces certification requirements for the assignment

Checklist Continued

Chemical Control

- Verify all sanitation chemicals are on the approved chemical list with current SDS on file
- Confirm chemical concentrations and dilution procedures are documented, verified, and logged at each use
- Check that sanitation chemicals are stored separately from food, packaging, and ingredients
- Ensure all chemical containers and dispensing equipment are labeled
- Confirm employees handling chemicals have received PPE training

Environmental Monitoring

- Confirm EMP sampling zones (Zones 1–4) are defined and schedules are documented
- Verify sampling frequency is adequate for production environment risk level
- Check that positive EMP results trigger documented corrective actions and root cause analysis
- Ensure EMP data is reviewed as part of the ongoing HACCP program review
- Confirm EMP records are retained and available for regulatory inspection

Allergen Sanitation

- Verify a documented allergen changeover cleaning protocol exists for all product transitions
- Confirm allergen verification methods (e.g., ELISA, ATP swabbing) are in use and results are logged
- Ensure changeover sanitation tasks are assigned to personnel trained in allergen control
- Confirm allergen cleaning records are linked to lot numbers for traceability
- Verify the allergen control program reflects all 9 FDA-recognized allergens

Record-Keeping

- Verify corrective action is documented for sanitation deviations or CCP failures
- Confirm corrective action records identify deviation, immediate action, root cause, and responsible personnel
- Ensure all HACCP sanitation records are retained for at least two years
- Check that records are accessible in a searchable, audit-ready format
- Verify that corrective action completion is signed off by qualified supervisory personnel

Checklist Continued

Sanitation Scheduling

- Confirm that sanitation tasks are formally scheduled and assigned to named, qualified individuals each shift
- Verify the scheduling system prevents uncertified employees from being assigned to sanitation CCPs
- Check that shift handoff procedures ensure sanitation task continuity across schedule changes
- Ensure absence management procedures include qualified backfill protocols for sanitation roles
- Confirm fatigue management policies are applied to employees in sanitation-critical roles

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