

# **Guidelines for Internal Compliance Programmes**

**Fishing Industry Inspection and Certification Council  
Wellington  
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## Preface

The Fishing Industry Inspection and Certification Council has agreed that it would be desirable for guidelines to be developed to assist with the establishment of internal compliance programmes.

These guidelines describe the responsibilities of all personnel involved in internal compliance programmes, as well as describing the required activities to ensure compliance with IAIS 003.8: *Internal Compliance Programme and Records Circular 1997*.

These guidelines are intended as recommendations for companies, but it should be noted that the requirements of the legislation and the Fishing Industry IAISs and circulars must be met.



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## Amendments

Suggestions are welcomed for alterations, deletions or additions to these guidelines to improve them or to make them better suited to the needs of the fishing industry and inspection staff. Suggestions should be forwarded to the co-ordinator, together with reasons for the change and any relevant experimental or documentary data.

Amendments to these guidelines can be identified by the issue number in the page header and a background screen over the changes which have been made. Deletions are marked by a background screen appearing where the entry has been deleted, e.g. .

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## Amendment Record

It is important that these guidelines are kept up-to-date by the prompt incorporation of amendments.

To update these guidelines when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue. Complete instructions will be given on the covering letter accompanying the amendment. File the covering letter at the back of the guidelines and sign off and date this page.

If you have any queries, please ask your local Inspector.

Issue No.	Date	Initials	Issue No.	Date	Initials
1	June 1997	MAF RA	11		
2	November 1999	MAF Food	12		
3			13		
4			14		
5			15		
6			16		
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# **1. Introduction**

## **1.1 Purpose**

These guidelines have been developed to assist company checkers comply with the requirements of IAIS 003.8: *Internal Compliance Programme and Records Circular 1997*.

## **1.2 Objectives of the Internal Compliance Programme**

The internal compliance programme will:

- ensure compliance with the requirements (i.e. the Regulations and Industry-Agreed Implementation Standards (IAISs));
- ensure that the fish and fish products produced are safe;
- provide authorised signatories with evidence that the fish and fish product being produced meets all requirements;
- ensure specific importing country requirements are met.

## **2. Preparation of the Internal Compliance Programme**

### **2.1 Approach**

An internal compliance programme should detail the items that are checked, how often they are checked and where they are recorded. It should also detail what is actually done, not what should be done. For example, if the chlorine level in the water is checked once a day and recorded on the daily check-list, then that is what should be in the internal compliance programme, not that the chlorine level is checked several times a day.

For certain checks, it may be possible to set limits on what is acceptable and actions to be taken if the checks show that they are not within those limits. For example, an acceptable level for chlorinated salt water may be 0.3 ppm, and the actions taken if the chlorine level falls below this could be addition of more chlorine and a check of the chlorination system to ensure it is working.

The checks carried out and the records kept should match up with the internal compliance programme and should comply with the requirements of the IAISs. Often the simplest way of preparing an internal compliance programme is to determine what checks are carried out and what records are kept of these, and write that down as the basis of the programme. This should then be checked against the standards to ensure it meets the requirements — if it doesn't, the programme with its appropriate checks and records will need to be modified until it does comply.

### **2.2 Components of the Programme**

The essential components of the internal compliance programme are:

- a daily pre-operational inspection;
- a series of checks carried out daily, weekly or at defined intervals (the specific details will be determined by the requirements in the Regulations or the IAISs, product being processed and performance);
- examples of the check lists used;
- all the above checks should tie in with the company's quality assurance programme.

There will also be periodic audits carried out by MAF Inspectors.

### **2.3 Examples of the Documentation Required**

A guide to the type of checks that will be carried out can be found in Appendix I. Appendix II gives the recommended frequency of checks, and Appendix III has in it samples of the types of check lists that can be used.



## **3. Operation of the Programme**

### **3.1 Responsibilities of the Licensee**

The Licensee will ensure that:

- a named person is responsible for the company quality assurance programme (generally this is the programme manager);
- the necessary corrective actions are taken;
- non-compliances and the actions taken are recorded;
- non-compliances are rectified within the appropriate time frame;
- all records are available to the Inspector.

Overall responsibility for the management of the internal compliance programme rests with the Licensee.

### **3.2 Responsibilities of the Programme Manager**

The role of the programme manager may include overseeing or actually carrying out the following:

- writing the original programme and reviewing as required;
- providing clear instructions to the company checker about the requirements of the programme;
- ensuring the company checker receives any additional training (refer to Section 4 on training);
- ensuring that the necessary corrective actions are identified for non-compliances, and that the actions are carried out when necessary, within an appropriate time frame;
- reviewing the records and procedures on a regular basis to identify any on-going problems and changes required;
- ensuring all records are available to the Inspector.

In small companies, the Licensee and the programme manager may be the same person.

### **3.3 Responsibilities of the Company Checkers**

The company checker should be familiar with the requirements of the IAISs and have access to these documents. The company checker will:

- understand the requirements of the Fish Export Processing Regulations 1995 and the IAISs in the area of their responsibility;
- have a basic knowledge of food hygiene;
- carry out the required daily and weekly checks.

The company checker is the person responsible for carrying out the checks required by the internal compliance programme. Depending on the premises, the position of the company checker may vary because of the size of the company, product range or complexity, training, etc.:

- In a small premises, the company checker will probably be the same person who carries out all the individual programme checks such as the Reception of Fish, Storage and Transport, Cleaning, etc. This allows many of the check lists used to be simplified in order to avoid unnecessary duplication.
- In a medium to large company, the individual programme checks may be carried out by several people with varying roles and areas of responsibility. The company checker in this case should be someone with overall responsibility for all the areas covered by the programmes. The checks by the company checker will ensure that all the programmes have been completed as required and that any non-compliances have been addressed, i.e. corrective actions have been defined and carried out.

It is important that the programme manager and the company checker have the necessary organisational freedom and authority to carry out their duties as required.

### **3.4 The Checking Process**

The company checker is required to carry out a thorough check of the specific areas identified by the company at the appropriate times. The company is required to have a list of specified checks that it carries out for its operation — it is this list that the checker uses while carrying out the inspections. Section 2.3 of IAIS 3.8 gives a broad outline of the areas to be checked, e.g. product areas, cleaning and sanitation personnel, but it is up to the company to detail what these checks involve in relation to the products they are processing and their premises.

If as a result of these checks there are no problems, then the checker records this as a tick in the appropriate place on the check sheet. A tick indicates that the area has been thoroughly checked and is in compliance.

### **3.5 Non-compliances**

Should there be unacceptable areas found during the inspections, these must be recorded as a cross on the check-sheet. The company checker must then record the following under the “Checker’s Comments” section:

- the details of the non-compliance;
- what action has been or will be taken;
- the allowed time for correcting the non-compliance;
- the sign off when the corrective action is completed.

This must be done regardless of the severity of the non-compliance or the time taken to rectify the problem.

Some companies may find that it is useful to classify defects, for example into critical, major or minor. See Appendix IV for definitions of these.

### **3.6 Safeguarding of Product**

If product is at immediate or possible risk of spoilage or contamination and the non-compliance cannot be corrected immediately, the company must take precautions to safeguard the product. This may include stopping production in a particular area. In these cases, the company checker will re-inspect the area to ensure compliance prior to recommencing production.

## **4. Recommended Competencies**

### **4.1 Company Checker**

It is important the company checker is competent to carry out the required duties. Competency in the following areas is recommended:

*Seafood ITO (Industry Training Organisation) Unit Standards*

15653 Complete checks for a prerequisite programme in a seafood processing operation

5331 Handle seafood products or 15344 Handle shellfish products

5332 Maintain personal hygiene and use hygienic work practices in seafood processing plant

6212 Clean and sanitise plant and equipment in a seafood processing plant.

**Or**

*Equivalent learning*

### **4.2 Person Responsible for the Internal Compliance Programme**

The person responsible for the internal compliance programme is generally the programme manager.

It is important that they are competent to carry out the required duties. Competency in the following areas is recommended:

*Seafood ITO (Industry Training Organisation) Unit Standards*

15654 Supervise a seafood processing operation in accordance with a company internal compliance programme

5331 Handle seafood products or 15344 Handle shellfish products

5332 Maintain personal hygiene and use hygienic work practices in seafood processing plant

6212 Clean and sanitise plant and equipment in a seafood processing plant.

**Or**

*Equivalent learning*

## Appendix I. The Types of Checks Required

The following provides a guide to the type of checks that may be carried out. Each premises should develop checks to suit its operation.

### Arrival of Fish

- product has been iced/refrigerated (other than live product)
- product temperature
- is there any evidence of spoilage of the fish?
- smell
- any foreign matter present, e.g. cigarette butts, paint, rust
- are the containers clean?
- is the product protected from contamination, damage?
- is the product alive (if required)?
- is the product correctly labelled?

### Pre-operational Check

- no vermin present
- no evidence of vermin overnight
- drains clean, covered, no smell
- hand washers have soap and towels present
- hand washers operating correctly
- water temperature correct
- sanitiser rinsed where required
- tables and equipment visually clean
- cutting boards clean, smooth
- clean smell in the room
- equipment off the floor
- fish tubs clean
- overalls clean
- boots clean
- aprons, gloves and armlets clean
- knives clean
- all condensation removed from the factory
- product being thawed according to process control criteria
- temperature checks of refrigeration

### Construction and Maintenance (acceptable target dates to rectify given)

- no flaking paint
- no cracks in the floor
- no holes in the wall
- no damage to ceilings
- windows/window ledges clean

- windows flyscreened
- no damaged drain covers
- all equipment smooth, food grade materials, free draining
- self-closing doors operating
- adequate ventilation
- all equipment easy to clean
- no leaking plumbing

### **Product Areas**

- all handwashers are operational
- all sanitisers operational
- sufficient towels, soap, etc.

### **Cleaning and Sanitation**

- all chemicals are approved
- written cleaning programme
- cleaning programme being adhered to
- potable water supply
- water at required temperature
- chemicals used correctly, i.e. correct concentration, contact time
- chemicals stored correctly
- no product or packaging present during cleaning

### **Product Contact Surfaces**

- of food grade material
- smooth, impervious, free draining
- stored correctly, e.g. cutting boards not propped against a wall
- protected from waste water splash and condensation
- hoses off the floor, not placed in product

### **Personnel and Protective Clothing**

- all personal clothing covered
- hair restrained/hats worn correctly
- overalls clean
- sleeves covered
- aprons/gloves stored correctly
- waterproof clothing washed at each break
- waterproof clothing not worn in toilet areas
- overalls changed daily
- no eating, etc., in processing area
- employees in acceptable health
- all protective clothing stored correctly

- hand washers being used by all staff at appropriate times
- boots clean
- watches, jewellery removed

### **Ingredients and Additives**

- only approved ingredients/additives
- ingredients/additives are of food grade
- stored correctly
- used according to approved process
- microbiologically sound

### **Containers and Packaging**

- clean
- intact, undamaged
- labelled correctly
- stored correctly
- dry
- protected from vermin

### **Maintenance Compounds**

- only approved chemicals
- stored correctly

### **Processing**

- process criteria being met
- checks being carried out
- contamination or deterioration of product minimised
- processing carried out without unnecessary delay

### **Final Product**

- handled correctly
- stored correctly
- suitable for use
- correct temperature
- microbiologically sound
- correctly labelled

### **Storage**

- temperature correct
- protected from contamination
- storage areas free of ice build up
- CATRs checked and calibrated

## **Excess Material**

- excess material contained in premises
- removed from the premises quickly
- containers holding excess material leakproof
- no build up of excess material in the premises
- no cross contamination of excess material with product

## **Vermin Control**

- approved programme in place
- approved programme being followed
- chemicals stored correctly
- fly screens present and in good repair
- fly zappers not positioned over product areas
- self-closing doors operational

## **Environs**

- clean and tidy
- no rubbish
- dust kept to a minimum

## **Transport**

- documentation completed correctly
- decks clean
- product covered
- product held at appropriate temperatures

## **Amenities**

- clean and tidy
- civilian clothes not stored above protective clothing
- enough lockers available for all staff
- protective clothing stored in a hygienic manner

## **Stores**

- clean and tidy
- part of cleaning programme
- goods stored protected from vermin and contamination
- packaging stored off the floor



## Appendix II. Recommended Frequency of Checks

<b>Programme</b>	<b>Recommended initial frequency of checks</b>	<b>Potential for reducing frequency with good compliance?</b>
Reception of fish	Daily	Yes
Managing the risk of contamination	Daily	Yes
Cleaning and sanitation	Daily	Yes
Water monitoring	Weekly	No
Product recall	As required	No
Non-complying product	As required	No
Storage and transport	Daily	Yes
Vermin control	Daily	Yes
<i>Listeria</i>	Weekly	No
Parasites	As required	No
Imported fish	As required	No
Depuration	As required	No
<b>Other Checks</b>		
Pre-operational hygiene (pre-op)	Daily	Yes
Process control	Daily	Yes — except for “high risk” products
Water containment	Daily	Yes
Final product (including labelling)	Daily	Yes
Construction and maintenance of the premises	Weekly	Yes
Containers and packaging	Weekly	Yes
Maintenance compounds	At time of purchase	No
Disposal of excess material and effluent	Daily	Yes
Certification	Weekly	Yes
Environs	Daily	Yes
Ingredients and additives	At time of purchase	No
Mercury	As required	No
Training	Monthly	No

## **Appendix III. Examples of Check Lists**

### **III.1 Internal Compliance Programme Check Lists for Smaller Premises**

Appendix III.1 contains an example of a check list to cover the daily and weekly checks.

### **III.2 Internal Compliance Programme Check Lists for Larger Premises**

The Cleaning and Sanitising Check List is separated from the main Internal Compliance Programme Check List in the system used in larger premises.

Appendix III.2 contains an example of a check list used to ensure all of the various programmes have been completed, and an example of a check list for one of these programmes, cleaning and sanitising.

### **III.3 Pre-operational Hygiene Check List**

This contains an example of a pre-op check list.

### III.1 Internal Compliance Programme Check Lists for Smaller Premises

Week starting: \_\_\_\_\_

Daily Checks	Requirements	Checked (signature)						
		Mon	Tue	Wed	Thu	Fri	Sat	Sun
<b>Cleaning and Sanitising</b>								
Pre-operational hygiene	Pre-op check sheet completed							
Personal hygiene	All staff observe correct procedures							
Clean down at breaks	Done effectively, including boots, aprons, gloves, knives							
Amenities, storage	Clean and tidy							
Carton room	Clean and tidy, packaging protected from contamination							
Chiller	Floors washed							
Processing area	Cleaned and sanitised daily as in programme							
Processing machinery	Cleaned and sanitised daily as in programme							
Boots, aprons, gloves, knives, etc.	Cleaned, sanitised and stored correctly at end of day							
Waste area and product	Waste covered; removed regularly							
<b>Reception of product</b>	Reception check sheet completed for each batch							
<b>Water/ice</b>	Taste, odour, colour OK							
<b>Refrigeration temperatures</b>	CATR checked; recorded on temperature check sheet							
<b>Contamination</b>	Product at no risk of contamination							
<b>Product temperatures</b>	Random checks recorded on temperature check sheet							
<b>Process control criteria</b>	For each process, monitoring done, including freezing and thawing							
<b>Final product</b>	Parasites; correct packaging, labelling, storage; market requirements (mercury)							
<b>Product loadout</b>	Vehicle clean, sound; temp. control, compressor, test							
<b>Inspector's Signature</b>								

<b>Weekly/Monthly Checks</b>	<b>Requirements</b>	<b>Checked</b>	<b>Inspector</b>
<b>Cleaning and Sanitising</b>			
Environs	Area tidy and no risk of product contamination		
Carton store	Floors washed		
Chiller	Cleaned and sanitised at least 2x weekly		
Blast freezer/freezer store	Floors clear; no significant frosting		
Ice plant	External surfaces and hatch way clean		
<b>Vermin</b>	Check bait stations, fly screens, etc.		
<b>Water monitoring</b>	Check if monthly test needs to be done this week		
<b>Listeria</b>	Check whether sampling required		
<b>Thermometer calibration</b>	Hand held thermometers – check if monthly calibration needed		
<b>Maintenance</b>	Check any problem areas for maintenance req'd, work completed, including equipment, leaks, hoses, etc.		
<b>Certification</b>	Randomly select x certificates; check for detail, errors		
<b>Additives/ingredients</b>	Approved, stored correctly		
<b>Chemicals</b>	Cleaning, sanitising, vermin control, etc. – approved, locked		

**Checker's Comments:**

Defect	Crit/Maj/Min	Action	To be completed by	Check completed	Signature

### III.2 Internal Compliance Programme Check List for Larger Premises

Week starting: \_\_\_\_\_

Daily Checks	Requirements	Checked (signature)						
		Mon	Tue	Wed	Thu	Fri	Sat	Sun
<b>Pre-op hygiene</b>	Pre-op check sheet completed; actions taken where required							
<b>Cleaning and sanitising</b>	Cleaning and sanitising of premises and equipment; personal hygiene; C & S check list completed							
<b>Water/ice</b>	Chlorine check (if req'd); taste, odour, colour OK							
<b>Reception of product</b>	Reception check sheet completed for each batch							
<b>Refrigeration temperatures</b>	CATR checked; recorded on temperature check sheet							
<b>Contamination</b>	Product not at risk of contamination							
<b>Product temperatures</b>	Random checks recorded on temperature check sheet							
<b>Process control criteria</b>	For each process, monitoring done, including freezing and thawing							
<b>Final product</b>	Suitable for consumption; parasite check; correct packaging, labelling, storage							
<b>Product loadout</b>	Container clean, sound; temp. control, compressor, test							
<b>Inspector's Signature</b>								

Weekly/Monthly Checks	Requirements	Checked	Signature
<b>Cleaning and sanitising</b>	Environ, chillers, freezers, ice plant, carton store, etc. checked on C & S check list		
<b>Vermin</b>	Check bait stations, fly screens, etc.		
<b>Water monitoring</b>	Check if monthly test needs to be done this week		
<b>Listeria</b>	Monitoring carried out if required		
<b>Maintenance</b>	Check any problem areas for maintenance req'd, work completed, including equipment, leaks, hoses, etc.		
<b>Labelling</b>	Randomly select packed product; check labels		
<b>Certification</b>	Randomly select x certificates; check for detail, errors		
<b>Additives/ingredients</b>	Approved, stored correctly		
<b>Chemicals</b>	Cleaning, sanitising, vermin control, etc. — approved, locked		
<b>Thermometer calibration</b>	Hand held thermometers — check if monthly calibration needed		

# Cleaning and Sanitising Check List

Week starting: \_\_\_\_\_

Daily Checks	Requirements	Checked (signature)						
		Mon	Tue	Wed	Thu	Fri	Sat	Sun
Personal hygiene	All staff observe correct procedures; correct clothing; wash hands, clean down when contaminated							
Clean down at breaks	Done effectively, including work areas, boots, aprons, gloves							
Knife sanitising	Carried out at breaks and when contaminated; sanitiser checked							
Amenities, storage	Clean and tidy							
Carton room	Clean tidy, packaging protected from contamination; off floor							
Chiller	Floors washed							
Processing area	Cleaned and sanitised as in programme							
Processing machinery	Cleaned and sanitised as in programme							
Boots, aprons, gloves, knives, etc	Cleaned, sanitised and stored correctly							
Bin wash area	Bins cleaned effectively; area tidy							
Waste area and product	Waste covered; removed regularly							
Inspector's Signature								

Weekly Checks	Requirements	Checked	Signature
Environs	Area tidy and no risk of product contamination		
Carton store	Floors washed		
Chiller	Cleaned and sanitised at least 2x weekly		
Blast freezer	Floors clear; no significant frosting		
Ice plant	External surfaces and hatch-way clean; chlorine monitoring up to date		

**Checker's Comments:**

<b>Defect</b>	<b>Crit/Maj/Min</b>	<b>Action</b>	<b>To be completed by</b>	<b>Check completed</b>	<b>Signature</b>



### III.3 Pre-Operational Hygiene Check List

Item	Condition	Criteria	
Pens, white board	Clear of offal	100% clear of offal from all areas, no smell	
Foot baths	Clear water, effective sanitiser	10% sanitiser solution	
Offal bin and surrounds	Clean of offal, new liner in bin	100% clean bin, 100% clear from surrounds	
Rubbish	Clear from surrounds, rubbish in bin	All rubbish in bin	
Doors/closing arms	Clean, both sides	100% clear of offal both sides	
Walls	Clear offal, smells sanitised	100% clear of offal, from all areas, smells freshly sanitised	
Floor	Clear of offal, no water residue	100% clear of offal, no water residue	
Baths	Clear of offal, smells sanitised	100% clear of offal, smells freshly sanitised	
Plastic housing	Clear of offal, smells sanitised	100% clear of offal, smells freshly sanitised, no water residue	
Tables incl. working table, cook up table	Clear of offal, smells sanitised, no water residue	100% clear of offal, smells freshly sanitised, no water residue	
Mincer	Clear of offal, smells sanitised	100% clear of offal, smells freshly sanitised, no water residue	
Mincer parts	Clear of offal, no rust on working parts	100% clear of offal, smells freshly sanitised	
Hand basin	Clean	100% free from offal	
Soap	Soap in dispenser	¾ full	
Warm running water	Working	30 - 45 °C	
Operating foot pedal	Working	Effective starting and stopping of water	
Sewage outlet	Clear of offal, no offensive smell	No presence of offal, no offensive smell	
Ceiling	No condensation	100% free from condensation	
Bins	Clear of offal, smells sanitised, no water residue	100% clear of offal, no water residue, stored upside down	
Knives/cutting	Clear of offal, smells sanitised, no rust marks	100% clear of offal, stored in knife holder, no rust marks	
Skin off	Clear of offal, no rust marks	100% clear of offal, no rust marks	
Paper towels	Available for use	¾ full of towels	
Water	Clear	No visible colouration, no offensive smell	

<b>Item</b>	<b>Condition</b>	<b>Criteria</b>	
Scrubbing brushes	Clear of offal, placed in bucket with sanitiser	100% clear of offal, placed in bin with sanitiser	
Cleaning	Clear of offal, no offensive smell	100% clear of offal, stored in cupboard	
Rubbish bin	Clear of offal, new liner	100% clear of offal, no offensive odour, new liner in place	
Gloves	Clean	100% clear of offal, smells freshly sanitised, no water residue	
Aprons	Clear of offal, smells sanitised	100% clear of offal, smells freshly sanitised	
Power point to mincer/ weighing machine	Clear of offal	100% clear of offal, no water residue	
Walkways-drying room hall/mats	Clear of offal	100% clear of offal	
Ear muffs, goggles, fire extinguisher	Clear of offal, fresh smell	100% clear of offal on both sides, smells sanitised , no water residue, hanging off hooks in factory	
Hoses	Clean, off the floor	100% clear of offal, stored off the floor.	
<p><b>The above checks were completed by _____ for the following</b></p> <p><b>shift _____ on the _____ 1997 _____ signature</b></p>			

## Appendix IV. Definitions of "Critical", "Major" and "Minor"

- Critical defect** The fish or fish product is in immediate danger of spoilage or contamination. Such defects shall be corrected immediately. In cases of unavoidable delay in correcting critical defects, it may be necessary for processing in that area to temporarily cease.
- Major defect** The fish or fish products is in possible danger of spoilage or contamination. A limited time shall be given for correcting a major defect (this may be minutes, hours or up to the next work break). Significant delays could make it necessary to stop processing in a specified area.
- Minor defect** The fish or fish product is not in direct danger but a procedure is not being followed or a standard is not being upheld. Some leeway on the time to correct the defect can be allowed, although in practice most minor defects can be corrected "on the spot".