Good Manufacturing Practices (GMP) Written Programs

Written programs are all the policies and procedures required to meet the standards of your food safety system. These programs include operational and monitoring procedures. Examples of written GMP programs include: environmental controls (premises and building), personnel practices, shipping, receiving, handling and storage, sanitation, equipment maintenance, pest control, recall and water safety.

A written program includes:

- program descriptor: name and number of the GMP program
- program standard (optional)
- scope: policies and procedures covered by the standard (optional)
- name of the person who developed the program
- policies and operational procedures
- monitoring procedures
- program review
- records

Policies and operational procedures

Policies are the stated rules of the organization. They usually refer to expected behavior of the employees. Examples of policies include: hand washing, jewelry policy, etc.

Operational procedures are the activities that need to be done to meet the standards. They are usually written as a set of instructions describing routine operations in the building, known as Standard Operating Procedures (SOP) or Sanitation Standard Operating Procedures (SSOP). Examples of SOPs include: SOP hand washing, SOP calibration of scales, SSOP cleaning and sanitizing food contact surfaces, etc.

SOP and SSOPs should include:

- name or position of the person(s) performing the task

- frequency
- detailed procedure to perform the task
- record (if it applies)
- corrective action (if it applies)

If any of these elements change, the procedures need to be reviewed, modified and employees retrained.

Monitoring procedures

These procedures confirm that everyone is following the GMP program as written and that the program is operating effectively.

Monitoring may involve:

- observing employees to ensure they are following appropriate behavior (e.g., personnel hygiene practices)
- observing employees performing their activities to ensure they are following the

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procedures described in the written programs (e.g., handling of chemicals during operation)
- examining products, utensils, chemicals for problems (e.g., products are labelled properly, products stored in designated areas)
- reviewing records to ensure that personnel are performing jobs as required (e.g., that receiver is only receiving products listed on the purchase order)

Additional monitoring procedures:
- reviewing all records to ensure they are complete and accurate. Confirm records are dated, that observations are included and proper corrective actions are taken according to documented procedures.
- reviewing training records to confirm that only trained personnel are performing specific tasks, such as handling chemicals, receiving ingredients and materials, etc.

All monitoring procedures should include:
- description of the monitoring task (what)
- name or position of the person responsible for monitoring (who)
- frequency of monitoring (when)
- procedure to monitor the SOPs/policies (how)
- deviation/corrective action -- steps to follow if a deviation is found
- records used to document the results of the activities. Records should contain the date and the initials of the person monitoring the task

Program review

Develop a procedure for reviewing your written programs to ensure they remain current and effective. This procedure should also include: who, what, when, how, corrective action and record.

Once your program is reviewed, update the programs and record the modifications in a log book. Document the results of the program review in your records (e.g., program review form). Train employees on updated procedures.

Where to start

Define your standard. Identify the standard you will follow as the foundation of your food safety program.

Meet the standard. Think of the policies and procedures required to meet your standards. Sometimes a policy will be enough to meet a standard; but often you will need a written procedure (SOP) to implement it.

Train your staff. Training is essential for the implementation of your written programs. It ensures policies and procedures described in your programs are performed correctly.

Develop monitoring procedures to ensure the activities are performed as indicated in the program. Create records to document the results or tasks.

Assess your compliance with the standards by performing an internal audit. This will help assess if the programs are being followed as written; if the documentation is complete; if SOPs meet the standards.

For more information on food safety please contact the Food Safety and Inspection Branch at foodsafety@gov.mb.ca.