

Recommendations v. Requirements

The following table identifies each of the potential differences in the proposed rule that would establish what is a recommendation instead of a requirement.

**Table.** Current Good Manufacturing Practice; Recommendations v. Requirements

|  |  |  |
| --- | --- | --- |
| **Proposed Rules** | **Recommendations (Shoulds)** | **Requirements (Musts)** |
| Proposed § 507.14(a)--Personnel--Personal Hygiene |  | The requirement for personal hygiene in animal food proposal is much weaker than the proposed rule for human food. |
| Proposed § 507.14(b)--Personnel—Education & Training | Proposed § 507.14(b) would *recommend* that personnel responsible for identifying plant sanitation failures or animal food contamination should have a background of education or experience to provide a level of competency necessary for production of clean and safe animal food. Animal foodhandlers and supervisors must receive appropriate training in proper food handling techniques and foodprotectionprinciples and should be informed of the danger of poorpersonal hygiene and insanitary practices. | *NOT REQUIRED*FDA is requesting comment on whether to change the *recommendations to requirements* for education or training in proper food handling techniques and food-protection principles. |
| Proposed § 507.17(a)--Plant and Grounds--Maintenance |  | It would *require* themaintainance of the grounds around a plant |
| Proposed § 507.17(b)--Plant and Grounds--Maintenance |  | It would be *required* that the plant's size, construction and design allow for cleaning, maintenance, and exclusion of pests. |
| Proposed § 507.19(a)—Sanitary Operations--Maintenance |  | It would be *required* that buildings, fixtures, and other physical structures be maintained in sufficient sanitary condition and repair to prevent animal food from becoming adulterated |
| Proposed § 507.19(b)—Sanitary Operations--Maintenance |  | It would *require* that cleaning compounds and sanitizing agents must be free from undesirable microorganisms |
| Proposed § 507.19(c)—Sanitary Operations-- Maintenance |  | It would *require* that only certain types of toxic materials, such as cleaning compounds, laboratory testing reagents, and lubrications for equipment, be used or stored in the plant. |
| Proposed § 507.19(d)—Sanitary Operations |  | It would *require* that effective measures be taken to exclude pestsfrom the manufacturing, processing, packing, and holding areas. |
| Proposing in § 507.19(e)(1) and (e)(2)—Sanitary Operations |  | It would *require* that animal food contact surfaces be cleaned. |
| Proposed § 507.19(e)(3)—Sanitary Operations | Proposed § 507.19(e)(3) would *recommend* that single-service articles (such as paper cups or paper towels) be stored in appropriate containers. | *NOT REQUIRED*Failure to properly store such articles could lead to contamination of the articles and then to contamination of animal food if thearticles come in contact with the animal food. |
| Proposed § 507.19(f)—Sanitary Operations | Proposed § 507.19(f) *recommends* that non-animal food-contact surfaces of equipment used in the operation of the plant be cleaned in a manner and as frequently as necessary to protect against contamination of animal food, animal food-contact surfaces, and animal foodpackaging materials.  | *NOT REQUIRED*FDA is requesting comment on whether to change proposed § 507.19(f) to *require rather than recommend* that non-animal food-contact surfaces of equipment used in the operation of a food plant be cleaned in a manner and as frequently as necessary to protect against contamination of animal food, animal food-contact surfaces, and animal food-packaging materials.Failure to clean non-animal food-contact surfaces could lead to contamination of animal food-contact surfaces of the equipment and utensils and then to contamination of animal food if thecontaminated equipment and utensils come in contact with animal food. |
| Proposed § 507.19(g)—Sanitary Operations | Proposed § 507.19(g) would *recommend* that cleaned and sanitized portable equipment with animal food-contact surfaces be stored in a place and in a way that would protect any animal-food contact surfaces from contamination.  | *NOT REQUIRED*FDA is requesting comment on whether to change proposed § 507.19(g) to *require rather than recommend* that cleaned and sanitized portable equipment with animal food-contact surfaces and utensils be stored in a location and manner that protects animal food-contact surfaces fromcontamination. Failure to properly store and handle such equipment and utensils could lead to contamination of the equipment and utensils and then to contamination of animal food if the equipment and utensils come in contact with animal food. |
| Proposed § 507.22(a)(3)—Equipment and Utensils | Proposed § 507.22(a)(3) would *recommend* that equipment be installed and maintained in such a way to facilitate the cleaning of that equipment and the adjacent spaces. | *NOT REQUIRED*FDA is requesting comment on whether to change proposed § 507.22(a)(3) to *require rather than recommend* that equipment be installed and maintained in such a way to facilitate the cleaning of that equipment and adjacent spaces. Failure to properly clean equipment and adjacent spaces due to improper installationand maintenance could lead to contamination of the equipment and then contamination of animal food if the equipment comes in contact with the animal food. |
| Proposed § 507.22(b)—Equipment and Utensils |  | It would *require* that seams on food-contact surfaces be maintained to minimize accumulation of food particles, dirt, and organic matter. |
| Proposed § 507.22(c)—Equipment and Utensils |  | It would *require* that equipment in the animal food manufacturing or handling area that does not come into contact with animalfood be constructed in a way that enables it to be kept in a clean condition. |
| Proposed § 507.22(d)—Equipment and Utensils |  | It would *require* that systems such as holding, conveying, and manufacturing, be of a design that would enable them to be maintained in an appropriate sanitary condition. |
| Proposed § 507.25(b)(1)(iv)—Equipment and Utensils | Proposed § 507.25(b)(1)(iv) would *recommend* that containers and carriers of raw materials be inspected on receipt to ensure that their condition has not contributed to contamination or deterioration of animal food. Visual inspection alone could identify certain physical hazards in incoming raw materials and ingredients and prevent certain contaminated ingredients from being added to animal food. | *NOT REQUIRED*FDA is requesting comment on whether to change proposed § 507.22(b)(1)(iv) to *require rather than recommend* that containers and carriers of raw materials and ingredients be inspected on receiptto ensure that their condition has not contributed to contamination or deterioration of animalfood. Containers and carriers of raw materials not properly maintained can lead tocontamination or deterioration of animal food. |
| Proposed § 507.25(c)--Adulterated Food | Proposed § 507.25(c) would *recommend* that animal food, raw materials, and ingredients that are adulterated would need to be disposed of in a manner that protects against the contamination of other animal food or, if the adulterated animal food is capable of being reconditioned, be reconditioned using an effective method that has been proven to be safe. | *NOT REQUIRED* |
| Proposed § 507.25(c)(10)-- | Itwould *recommend* that animal food be protected fromcontaminants that my drip, drain, or be drawn into the food. | *NOT REQUIRED*There are no circumstances where it would not be necessary to provide adequate physical protection of animal food fromcontaminants that may drip, drain, or be drawn into animal food. |
| Proposed § 507.25(c)(11)-- | It would *recommend* that when heat blanching is required in the preparation of animal food.  | *NOT REQUIRED*Properly heating and cooling animal food during blanching is necessary to protect animal food from contamination and wouldapply in all cases for animal food when heat blanching is required in the preparation. |

Copyright 2013 | Mollie Morrissette | Poisoned Pets