

**Minnesota Department of Agriculture
Food and Feed Safety Division**

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Title: Surveillance Sampling SOP	

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1. PURPOSE

The purpose of this document is to describe the rationale for collecting surveillance samples and process for creating the Surveillance Sampling Plan by the Minnesota Department of Agriculture's (MDA) Food and Feed Safety Division (FFSD) Manufactured Food and Retail Food Programs. This procedure identifies when surveillance samples should be collected as a part of the Surveillance Sampling Plan to monitor food products or environments of interest.

2. SCOPE

This document pertains to all parties involved in creating the Surveillance Sampling Plan and food inspectors collecting samples as a part of the Surveillance Sampling Program. All samples collected using this procedure must be official samples and should be handled accordingly. This procedure only applies to scheduled, non-FDA contract surveillance sampling and does not define processes for response, complaint or inspector-initiated sampling. Refer to *FOOD.30.10 – Environmental Sampling – Food Manufacturing SOP* for all FDA Contract sampling. This SOP does not include the specific instructions for collecting, transporting, and submitting the samples, but these specific instructions may be referenced by this document where necessary.

3. BACKGROUND

Surveillance sampling can allow for an enhanced picture of emerging issues, it can act as a check for new standards or requirements, and it can allow for exploration of issues of interest. Surveillance sampling occurs on a quarterly basis, as time and resources allow. While the goal of the program is to complete four sampling assignments per year, other division work may take priority over a surveillance sampling assignment. Sampling assignments may shift or vary in length dependent on the samples assigned or other staff priorities. The Surveillance Sampling Plan Coordinator leads the development of each Surveillance Sampling Plan; the planning process for each quarter will begin at least six weeks before the first day of sampling. Thus, surveillance sample planning and sample collection may be occurring simultaneously (e.g. planning for Fall Surveillance while Summer Surveillance is ongoing). Food inspectors collecting manufactured food samples in commerce for surveillance sampling may be part of the Retail Food Program. All food inspection staff receive training on sampling techniques and documentation.

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4. RESPONSIBILITY

Compliance Staff – The Compliance Staff will participate in planning meetings as requested and assist in the determination of next steps following violative sample results.

Food Inspector – The Food Inspector will provide suggestions for surveillance sampling as able and fulfill sampling assignments as assigned.

Food Inspection Supervisor – The Food Supervisor will participate in planning meetings, assign surveillance sampling assignments to staff, consult with the Food Inspectors regarding recommendations for Surveillance Sample collection, and assist in the determination of next steps following violative sample results.

Food Program Manager – The Manufactured Food or Retail Food Program Manager will assist in the determination of next steps following violative sample results.

Surveillance Sampling Plan Coordinator – The Surveillance Sampling Plan Coordinator will schedule the Surveillance Sampling Planning Meeting(s) and coordinate with food program staff and the laboratory regarding the sample schedule. Provide schedule guidelines to Inspection Supervisors and an informational memo and Sample Request Forms to all inspection staff involved in the Surveillance Sampling Program. The coordinator also provides continual support throughout the surveillance sampling process.

Laboratory Staff – The Lab Staff will participate in planning meetings as requested and provide guidance related to sample analyses as needed.

5. DEFINITIONS

Official Sample: An Official Sample is a sample taken in a manner so that it can serve as the basis for enforcement and/or legal action and handled in a manner that preserves integrity as evidence including identity, ownership, traceability, and a clear record of chain of custody.

Surveillance Sampling Planning Meetings: Surveillance Sampling Planning Meetings are meetings held to discuss and develop the Surveillance Sampling Plan. Participants may include but are not limited to: Inspection Supervisors, selected Chemistry and Microbiology Laboratory staff, selected Compliance Program staff, the Program Management, Division Director and/or Assistant Director, and the Surveillance Sampling Plan Coordinator.

Surveillance Sampling Plan: The Surveillance Sampling Plan is the end product of Surveillance Sample Planning Meetings. It is made up of a surveillance sampling schedule and surveillance sampling memo.

6. PROCEDURES

6.1. Surveillance Sampling Plan Coordinator

6.1.1. Surveillance Sampling Planning Meeting –

- a. Lead the initial Sampling Planning Meeting(s).
- b. Create a quarterly sampling plan.

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- c. Schedule all planning meetings. The initial planning meeting should take place at least six weeks before sample collection begins. Additional meetings may be scheduled as needed.
 - d. Collect suggestions for surveillance sampling projects before the sampling planning meeting. Suggestions can be collected via email or by meeting in person with individuals within the program. The coordinator should send out a call for suggestion for sampling projects at least three weeks before the initial sampling meeting.
 - e. Communicate and update the sampling team and all involved in the Surveillance Sampling Plan development and execution.
- 6.1.2. **Staff Schedule Assignments** – Based on the Surveillance Sampling Planning Meeting(s):
- a. Develop a schedule for sampling assignments.
 - b. Provide the plan to Inspection Supervisors as guidance for assigning staff to specific dates.
 - c. Ensure the schedule spreadsheet is updated with the current sampling projects and schedules (see Example Surveillance Sample Collection Schedule). The spreadsheet includes the following data:
 - I. Food Product or Swab Collected
 - II. Analysis Requested
 - III. Sample Submission Deadline
 - IV. Sampling Site
 - V. Sample Size
 - VI. Total Number of Samples
 - VII. Survey Name
 - VIII. Food Inspector Name (filled out by Inspection Supervisor)
 - d. Provide a memo to all staff involved at least two weeks prior to the beginning of the sampling quarter which describes the details and sampling requirements of each project (see Example Surveillance Sample Collection Memo). The memo will include:
 - I. A review of guidelines
 - II. Sampling date range
 - III. Chemistry sampling projects (description, required sample size, product description, analysis code, survey name, and other sampling guidance needed)

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- IV. Microbiology sampling projects (description, required sample size, product description, analysis code, survey name, and other sampling guidance needed)
- V. Residue sampling projects (description, required sample size, product description, analysis code, survey name, and other sampling guidance needed)

e. Complete and email the *Sample Request Form* to the assigned sampler at least one week prior to the sampling assignment. Attach the sample request form to the inspection file in USAFS, if applicable.

6.1.3. **Surveillance Sample Collection** – Continue communication with Inspection Supervisors, Inspectors, and laboratory staff to ensure the sampling plan is properly executed.

6.2. Food Inspection Supervisors

6.2.1. Surveillance Sampling Planning Meeting –

- a. Participate in the initial Sampling Planning Meeting(s). Identify the following:
 - i. Resource availability (inspector availability, training, experience, etc.)
 - ii. Suggestions for sampling projects
 - iii. Timeline for sampling program projects (frequency of sampling, length of sampling period)

6.2.2. **Staff Schedule Assignments** – The Surveillance Sampling Plan Coordinator will provide the Inspection Supervisors with a sampling schedule with open dates for sampling assignments at least one month before the first scheduled sampling date. Supervisors will be assigned a time period within the schedule for which they are responsible.

- a. Assign sampling dates to inspectors at least three weeks before the first scheduled sampling date based on the following criteria:
 - I. Inspector territory
 - II. Work load
 - III. Sampling type (manufactured food, retail food, sampling teams required, etc.)
 - IV. Inspector training and experience

Inspectors may work directly with their supervisor if they are unable to complete a sampling assignment or if it must be reassigned.

6.2.3. **Surveillance Sample Collection** – Continue to work with the Surveillance Sampling Plan Coordinator to resolve issues throughout the process.

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6.3. Food Inspectors

- 6.3.1. **Surveillance Sampling Planning Meeting** – Inspectors will not routinely participate in Sampling Planning Meetings, but are encouraged to submit suggestions for sampling. A request for suggestions will be circulated by the Surveillance Sampling Plan Coordinator at least three weeks before the initial Sampling Planning Meeting.
- a. As requested, submit suggestions to the Surveillance Sampling Plan Coordinator by the date of the initial Sampling Planning Meeting.
- 6.3.2. **Staff Schedule Assignments** – Inspection staff are given surveillance sampling assignments by their supervisor based on territory, workload, sample type, training, and experience.
- a. Review the sampling schedule upon receipt to ensure ability to sample on assigned dates. All scheduling conflicts or concerns must be communicated with a Supervisor.
 - b. Communicate with the sampling team, if applicable, before the sampling assignment date.
- 6.3.3. **Surveillance Sample Collection** – Inspection staff will execute the Surveillance Sampling Plan by collecting samples as scheduled for an allotted time period.
- a. Collect the assigned sample within the appropriate time period and routinely reference the sampling schedule to ensure this occurs. If a deadline cannot be met, notify the supervisor and the Surveillance Sampling Plan Coordinator.
 - b. Collect samples identified on the *Sample Request Form* using the appropriate Work Instructions listed below:
 - I. *FOOD.WI.30.02 - Aseptic Food Collection*
 - II. *FOOD.WI.30.03 - Aseptic Water Collection*
 - III. *FOOD.WI.30.04 - Environmental Swabs and Sponges Collection at Retail*
 - IV. *FOOD.WI.30.13 – Environmental Sampling at Manufacturing*
 - V. *FOOD.WI.30.05 - Non-Aseptic Collection Methods*
 - VI. *FOOD.WI.30.06 - Sample Seal, Storage, and Transfer (required for all samples)*
 - VII. *FOOD.WI.30.46 – Creating Food Samples in USAFS WI*
 - VIII. *FOOD.WI.30.61 – Paper Sample Submission WI*
 - c. Collect supplier information for all samples unless instructed otherwise. This information could assist in the rapid traceback of any product found to be

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contaminated. Supplier information can consist of copies of firm records or can be written in the inspection report.

- d. Collect labeling related to the product collected if not collecting an in-tact, packaged product. These may include:
 - i. Photographs of the bulk food container label (refer to *FOOD.WI.30.59 - Documenting Digital Photographs-Video Evidence-Manufactured Foods WI* or *FOOD.WI.30.62 - Documenting Digital Photographs-Video Evidence-Retail Food WI as applicable*)
 - ii. Photographs of ALL sides of a packaged food product (refer to *FOOD.WI.30.59 - Documenting Digital Photographs-Video Evidence-Manufactured Foods WI* or *FOOD.WI.30.62 - Documenting Digital Photographs-Video Evidence-Retail Food WI as applicable*)
 - iii. A scan or photocopy of a label or print-out of the label from the facility:
 - a) attach to the Inspection Maintenance page in USAFS if label is collected to support a written order
 - b) attach to the Sample Maintenance page in USAFS if label is collected to support a submitted sample
- e. Some samples will require photograph collection. These samples will be identified in the informational memo. Refer to *FOOD.WI.30.59 - Documenting Digital Photographs-Video Evidence-Manufactured Foods WI* or *FOOD.WI.30.62 - Documenting Digital Photographs-Video Evidence-Retail Food WI* for guidance on photo documentation and submission.

6.4. Laboratory Staff

6.4.1. Surveillance Sampling Planning Meeting –

- a. Participate in the Surveillance Sampling planning process as requested. Representatives from both the Chemistry and Microbiology Labs will participate in the initial Sampling Planning Meeting(s).
- b. During plan development, identify the following:
 - I. Limitations of specific sampling projects (lab capabilities or limitations, accuracy of tests, etc.)
 - II. Limitations of the plan as a whole (time and staffing resources, etc.)
 - III. Alterations to acceptance criteria for special situations
 - IV. Timeline for sampling program (frequency of sampling, length of sampling period)

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- 6.4.2. **Surveillance Sample Collection** – Continue to work with the Surveillance Sampling Plan Coordinator to resolve issues during the execution of the Surveillance Sampling Plan.

6.5. Compliance Staff

6.5.1. **Surveillance Sampling Planning Meeting** –

- a. Participate in the initial Sampling Planning Meeting(s) as requested.

6.5.2. **Surveillance Sample Collection** – Compliance staff will not have a role in sample collection but may if there are violative sample results.

- a. Assist Food Inspection Supervisors and Manager in identifying next steps or actions following any violative sample results.

7. RELATED DOCUMENTS (includes References, Attachments)

FOOD.WI.30.02 - Aseptic Food Collection WI

FOOD.WI.30.03 - Aseptic Water Collection WI

FOOD.WI.30.04 - Environmental Sample Collection at Retail WI

FOOD.WI.30.05 - Non-Aseptic Collection Methods WI

FOOD.WI.30.06 - Sample Seal, Storage, and Transfer WI

FOOD.WI.30.13 – Environmental Sampling at Manufacturing WI

FOOD.WI.30.46 – Creating Food Samples in USAFS WI

FOOD.WI.30.59 - Documenting Digital Photographs-Video Evidence-Manufactured Foods WI

FOOD.WI.30.61 – Paper Sample Submission WI

FOOD.WI.30.62 - Documenting Digital Photographs-Video Evidence-Retail Food WI

Food Programs Sample Acceptance Criteria

Sample Release Form

8. EQUIPMENT/MATERIALS NEEDED

N/A

9. SAFETY

N/A

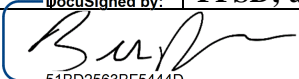
10. CIRCULATION

This document is circulated to the following individuals within FFSD: Inspection Staff, Inspection Supervisors, Program Managers, RRT staff, Compliance staff, and relevant laboratory staff. The current version will be stored electronically on the FFSD document control site.

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11. APPROVAL/DOCUMENT HISTORY

Document History		
Version #	Status (I, R)	Change History
1	I	Initial Policy Drafting.
2	R	Updated procedure to begin with Sampling Plan Coordinator Role and planning meeting; updates made due to division structure change from DFID to FFSD; updated names of related work instructions.
DocuSigned by:  <small>64BD2568BF6444D...</small>		1/3/2017
Approved By:		Date
Approved By:		Date

I = Initial document; R = Revised document