

# **Winery Inspections in Washington State**

***Claudia Coles***

***Policy & External Affairs Advisor***

***Washington State Department of Agriculture***

## **Food Safety Regulations:**

- Federal FDA – GMPs (21 CFR part 117)
  - WSDA FDA Contract Inspections
- State - WSLCB - Chapter 314-24 -020 WAC
- Local Health Departments
  - tasting rooms serving food – Food Code Rules

## WAC 314-24-020 Sanitation.

Domestic winery premises shall be constructed, kept and maintained in a clean and sanitary condition, and in accordance with such rules and regulations as shall be prescribed by the state department of agriculture through the dairy and food division, for the sanitation thereof and applicable to the sanitation of such winery premises.

[Order 5, § 314-24-020, filed 8/7/69, effective 9/8/69; Rule 60, filed 6/13/63.]

## WSDA Winery Inspections 2013 -2017

- 59 FDA State Contract Inspections – appx 10 to 15/year
- All Inspections reviewed for GMPs
- firms noted critical violation for lack of hand sink/toilet
- Inspections found minor violations:
  - Unscreened openings
  - Rodent activity in storage areas
  - Poor storage practices of wine handling equipment
  - Insanitary conditions of production areas of facility

## 21 CFR Part 117 –

# Current Good Manufacturing Practice, Hazard Analysis, and Risk-based Preventive Controls for Human Food

### **GMPs & PCs:**

Subpart A – General Provisions

Subpart B – Current Good Manufacturing Practice

Subpart C – Hazard Analysis and Risk-based Preventive Controls

Subpart D – Modified Requirements

Subpart E – Withdrawal of a Qualified Facility Exemption

Subpart F – Requirements Applying to Records That Must be Established and Maintained

Subpart G – Supply-chain Program

## Components of Good Manufacturing Practices (GMPs)

- Personnel
- Plant and grounds
- Sanitary operations\*
- Sanitary facilities and controls
- Equipment and utensils
- Processes and controls\*
- Warehousing and distribution
- **Holding and distribution of human food by-products for use as animal food, and**
- Defect action levels

\*Some components may be preventive controls based on hazard analysis

21 CFR 117.4 Qualifications of Individuals  
Who Manufacture, Process, Pack, or Hold Food

- Must have the education/ training/ experience necessary to manufacture, process, pack, or hold clean and safe food as appropriate to the individual's assigned duties
- *Must receive training in the principles of food hygiene and food safety, as appropriate to the food, the facility and the individual's assigned duties*
- **Records** required for food hygiene and food safety training, as appropriate

## GMPs for By-Products Sent to Animal Food

- Human food by-products sent to animal food use must comply with GMPs during holding and distribution; e.g.
  - Must be held under conditions that will protect against contamination
    - Ensure the safety of containers
    - Avoid contamination from trash or garbage
    - Identify the material through labeling

\*\* Winery lees, seeds, stems, leaves.....



## Commercial Processing of Produce

### Produce Safety Law:

- Wine Grapes are a covered produce crop under 21 CFR part 112
- Wine grapes must meet produce rules OR
- Meet the exemption allowance such as the commercial processing exemption criteria
  - Written agreements between grower & winery
  - Current enforcement discretion by FDA
  - FDA is looking to re-open the rules & public comments will be received

## 2018 Legislative Change

### Senate Bill 6380 & House Bill 2699

- Exempting alcohol manufacturers from the food storage warehouse license.
  - Limited to alcoholic only storage operations
  - Must be overseen by WSLCB

Both bills are supported by WSDA & WSLCB



# Questions?

**Claudia Coles**

**WSDA Policy & External Affairs Advisor  
ccoles@agr.wa.gov**