

Texas Poultry HACCP Roundtable

February 1, 2005

Morning Session

- See attached attendance sheet with contact information. Much better industry participation. Companies represented: Pilgrim's Pride, Sanderson Farms, John Soules Food, Cargill, Tyson, and Buddy's Natural Chicken.
- Dr. Michael Davis will be the new roundtable moderator beginning at the next roundtable meeting
- Everyone approved of the new facility with the exception of temperature control.

Afternoon Session

Agency Representatives: Al Almanza
Dr. Gary Cannon

Opening discussion centered on a summary of assignments since our last meeting. Dr. Gary Cannon and Dr. Jennifer McKean will fill the Deputy District Manager positions for the Dallas District. In addition 2 new EIAOs have been assigned to the district office.

Questions/Answers

1. What are the staffing decisions for Mt. Pleasant due to the IIC (vet.) shortage?

Reviewing staffing and trying to hire new vet every day. Problem is we have a nationwide shortage of qualified vets. I have hired one vet from Tennessee; he is the only one that has applied with appropriate qualifications. He will be on board in 6 weeks. As more vacancies open, we will look at putting supervisory inspectors into these facilities instead of vets. This will not be the case for HIMP plants. This staffing solution has been used in the panhandle with some success. I am making a proposal this be done in Mt. Pleasant and some other locations. Hoping to complete these staffing decisions within the next 4 weeks depending on approval after District Managers meeting in Atlanta next week.

2. Could you explain the team inspection? What does it entail? What will be the focus?

Team inspection will be more obvious in areas with multiple plants (i.e. Dallas Metroplex area). Dallas circuit will have all 9's covering this area. They would come in on Monday with a meeting to determine their assignments for a week - tasks in food safety, homeland security, etc. This is fuzzi now because we need budgetary approval. Would entail staggered shifts; establishments could have inspectors come in at several different times of the day to perform tasks. Team inspection is not going to happen until sometime in 2008 because of the USDA budget process. All tasks would be completed in a one week time period. Food safety is the main focus for this inspection procedure.

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3. USDA staffing – is there a plan? Eliminating veterinarians from poultry processing plants?

Don't have a plan. They are doing the best they can because of the national shortage of vets. The vets just don't want to work for USDA.

4. Update on staffing in Dr. Hairgroves circuit?

Covered in previous discussions.

5. Are they going to replace veterinarians that have retired?

Covered in previous discussions.

6. What can be done to derive better consistency between agency personnel? Too much variation, even between shifts.

I could say there is too much variation in industry as well. I wish I could cut inspectors out with a cookie cutter; however, I cannot. HACCP has brought more consistency and I feel the old system was much worse. Variation causes problems with management and I understand that. If there are errors let me know and I will handle them.

7. Why are certain circuits held to different standards – by the circuit supervisor – one circuit has X number of NRs, another has Y number of NRs? You said before that you can go into any plant at any time and find problems. If you rotated circuit supervisors and inspection staff to other circuits the two results would not match – Why?

“If I could clone Dr. Hairgrove, I would. I would put her circuit up to any in the country. If I could I would select more front line supervisors like her.” We would like to be as uniform as possible. Hope that filling the deputy district manager positions will help with this. I will be making visits to each location to address this in the near future.

8. Concerns over USDA being consistent at plants.

Covered in previous discussions.

9. Is there a schedule set for plants that have not had an EIAO audit to be audited?

No set schedule. Assessments will be completed in between addressing recalls and consumer complaints.

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10. What triggers an EIAO assessment? What is the focus for EIAO assessments this year?

Listeria monocytogenes failure, Salmonella subset failure, school lunch programs w/ E. coli.

Focus will be helping industry find things they have not or cannot find in their programs. Beef plants are complete so Listeria monocytogenes has been the focus. Trying to schedule only plants that have not had an assessment; however, this depends on cause. Al Almanza has been instructed to schedule processing facilities during 2005. "Poultry is next."

11. Discussion of trends and findings in district EIAP audits.

Findings seem to be all over the board. Validation and verification is the big deal. Seems to be confusing to some people, not here to hammer industry, just want to help. We will tell you what we find as we go. If it's major we might choose to take action. If it's minor, we teach while we are there and probably take no action. Pride ourselves in having all of our EIAO's on the same page. Decision making documentation is also very important. We are not disputing; just want to know why you decided "once a week" or "calibration frequency". Most decision making documents are not adequate. If the flow chart lists 15 steps, the hazard analysis must be designed around 15 numbered steps.

12. Are NRs issued for OCP-1 (airsac) failure of Table 2 based on the number of birds tested up to a point or based on the total number of birds to be tested for a shift by USDA?

Are we issuing NRs for this? Talked to Dr. Hairgrove about this and don't remember her rationale for this. Will get with Dr. Hairgrove and get back to the roundtable.

13. Is it "normal" or accepted practice to issue two NRs for OCP-1 (airsac) – one for the failure one for the process being out of control?

Not normal. You shouldn't get 2 each time. I would say you only get one. No basis for doing this. What does issuing 2 NR's serve? Will follow up with Dr. Hairgrove.

14. Can an NR be issued for a process being out of control for feces found by FSIS prior to the CCP (@the C.I. Station)? (issued as an SSOP NR).

Can, but should they issue a NR? Would have to be other circumstances.

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15. Can an NR be written/issued for an NR not being answered by a date requested by the IIC?

This should not be happening, will talk to front-line supervision and get back to the group.

16. What can be done to streamline NR appeal process? Still having difficulty getting timely responses.

From IIC's or Dr. Hairgrove? I have spoken to Dr. Hairgrove about this as this is one of my pet peaves. I am sorry to see this question again, so I will address this. Also commented on writing NRs for rusting motor mounts: this is a waste of time, we need to focus on food safety issues.

17. Is there a regulatory requirement for USDA to verify moisture content by performing a "moisture test" through the chiller?

Not any more. We shouldn't be doing tests, just verifying this is being completed by industry.

18. Is there a new directive on retained water? How does a USDA inspector currently verify moisture content of product?

Yes there is a new moisture directive; revision will be out in next few weeks.

19. What, if any, documentation is required for feces found in the C.I. if there is a step after the inspector? The C.I. is not where the CCP is.

No documentation is required, let the system work.

20. Is there a regulatory requirement about where reprocessed birds may be hung back on the main evisceration line to be inspected by FSIS?

Not a regulatory requirement.

21. What are the "limits" as to FSIS inspecting/checking carcasses that have not completed the process (checks being done @ various points on the evisceration line)?

No limits exist before you complete the process.

22. Can we use a USDA sampling frequency for justification for plant sampling frequencies?

Yes.

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23. Can single shift records be reviewed more than once and by numerous different inspectors?

Yes they can; however, I would rather they spend there time doing more productive work. Should be communicating between shifts to make the best use of their time.

24. Validation is being questioned – local inspection is reviewing validation procedures and stating “someone will be looking at this soon”. What is adequate validation?

90 days worth of records with no deviations. All decision making and supportive documents in place when we go out. Ask yourself; how well are you implementing?

25. If USDA tags (retains) product and the establishment provides USDA with negative micro results – can a USDA inspector at the establishment release product even though the NR is being appealed? If by chance, USDA releases product after receiving negative micro results while the NR is under appeal – Who is held accountable for the product? (USDA or the establishment).

Inspector obviously can release. The establishment is always held accountable for the product. We are not the ones that will be sued, industry will. There were other circumstances surrounding this situation. If a NR is under appeal, I would hold product. USDA could have required a recall; however, we decided this served no purpose. Releasing product while under appeal is just bad business. Negative micro results are not the sole factor, where chemical and physical attributes considered? Need more to work with.

26. If I have a large prepared foods plant – how many inspectors should I have per shift?

Typically one inspector. Will depend on how many HACCP plans in the future.

27. Product is retained by USDA for 10 months. Lab results have been submitted 2 times to Dallas – numerous phone calls and no answer. The NR has been closed by USDA, the lab results are acceptable for human consumption, and we still can not release the product – Why?

Not getting back is not acceptable. All components that adulterated this product must be addressed. Unknown situations or substances may result in us never releasing product. This is an example of where industry has the right to go to a higher level.

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28. 417.5(c) – “where practical” – Please define.

Verifications being performed by someone else. Where you have 2 people, it is not practical. Where you have 3-4 people, it is practical and you should be doing this.

29. Pathogen testing on cooked product – How is the sampling schedule designed?

30. In reference to physical hazards – If the plant has credible validation for a food safety hazard, can the IIC determine an object to be a hazard if the validation says it is not?

If it is determined not likely to occur, not up to the IIC to determine. We want industry to identify and describe hazards likely to occur. Should be addressed in the hazard analysis and the supporting documentation.

31. Are inspectors going to begin monitoring CCPs at the monitoring frequency stated in the plant’s HACCP plan?

No

32. Will there be any industry FSRE training scheduled for this year?

Not aware of the training schedule, will have to get back to you.

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