

Texas Poultry HACCP Roundtable

August 17, 2006

Notes: Thank you all for participation in the August edition of the Texas Poultry HACCP Roundtable. While there were not a lot of questions, the questions that were presented brought about a lot of discussion. FSIS representatives were Gary Cannon and Vicki Ruback. We thank them for the USDA's continued participation in the HACCP Roundtable. The next roundtable will be scheduled for early November. If your company cannot send a representative, but would like to pose questions, please email them to me at mdavis@poultry.tamu.edu.

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Questions

1. Are preventative measures actions taken that are reasonably likely to prevent recurrence? I.e. Are there any measures that can be taken to make sure an incident never occurs again?

We hope that inspection personnel are using common sense when releasing an area with regard to preventive measures. For example, when conducting an Pre-Op SSOP inspection on non food-contact surfaces, then a reasonable amount of time should be given to come up with preventive measures, since the area in question is not a food contact surface. However, with food contact surfaces in an SSOP or HACCP area, there should be a limited amount of time so that the process can be brought back under control. As a side note, you should not use 're-train employee' as a preventive measure all the time. Another note is that you use the information from your SSOP records to plot trends or hot spots. By doing this you can use extra cleaning techniques or a different approach to control the hot spots). This might help the establishment identify trends and hot spots stop constant documentation in certain areas.

2. During an FSA, the Compliance Rating (%) is documented. Local inspection also quotes these numbers.
 - a. How are the compliance ratings computed?
 - b. How do scheduled vs. non-scheduled tasks weigh in the calculation of % compliance for an establishment?
 - c. Are unscheduled tasks given equal weight?

Prior to an FSA, inspection personnel will look at 180 days of compliance history. The compliance percentage is calculated by looking at the total number of NR's compared to the total number of tasks (scheduled and unscheduled) that are performed. Unscheduled tasks are given the same weight as scheduled tasks when computing the percentage. However, the establishment should make sure that they address any issues where multiple NR's are issued where one NR would suffice. For example, a single 01C02 is sufficient for the shift. Once a noncompliance issue is found the NR should be opened and all subsequent

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noncompliances found for that shift should be added to the original NR, instead of opening other, new NR's.

3. Has the rotation of GS-9 inspectors proven to be as beneficial to USDA as expected?

Yes. There have been both good and bad incidences. In general, the system has worked out. There are still some issues, but it will only get better as the system is in place longer.

4. Will we see biosecurity become a regulation soon?

- a. If so, will this add a section to NR's or will there be another form that will be filled out for biosecurity issues?

This is speculation only, but most likely this will become a regulation. As of right now, the only action taken is the 'Memorandum of Interview' (MOI). Establishments may also want to look at FSIS Directive 5420.1 revision 3. It addresses issues related to Homeland Security. If biosecurity does become regulatory, we don't know if issues related to biosecurity will be on an NR form or not.

5. What can we expect as far as Animal Welfare from USDA?

Regarding Good Commercial Practices, the main objective is Humane Handling.

6. What is the latest on the *Salmonella* initiative?

Since FSIS is under budgetary restrictions until the first of October, establishments that are located outside of an EIAO's local traveling distance will not be having visits unless there is cause such as Lm positives test results on product sampling, just as an example. After October 1, travel restrictions should ease up.

7. It has been stated before that there is not a quota for the number of NR's written. However, the establishment's IIC has stated that there have not been enough NR's written, therefore we should get ready to receive more.

Again, this should not be going on. If there is not a problem, then there should not be an NR. There is no quota set by FSIS or the Dallas District Office.

8. What percentage of FSA's result in NOIE's?

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We don't have specific numbers, but for the past four years, the number of NOIE's has increased slightly, and has been decreasing again. For calendar year 2005, there were 40, and from Jan. 1, 2006 until now there have been 12.

9. At this time, is there any way that a plant could change inspection to HIMP? If so, is there a list and how do you get on the list?

Not at this time.

10. Referring to NR quotas again. Some inspectors have stated that they need to write an NR every day to show that they are doing their job.

Refer to question 7.

11. Is there still a vet shortage? How about GS-8's?

The population of veterinarians will go up and down due to attrition and retirement. Dr. McKean has recruited a lot of vets over the past couple of years. As for GS-8's, the agency is allowed only so many inspectors. Because of attrition and promotion, it may take a while for new inspectors to be put in place (paperwork and training). There is not really a shortage, it can just take a while when one GS-8 leaves before a replacement can be trained fully and allowed to perform tasks.

12. Regarding preventive measures. Can the inspector decline to accept your preventive measure and keep the department down for a long period of time and then decide to accept a preventive measure that was first given to them?

Technically, yes. Again, this is a common sense issue. There may be some incidences where investigation into the problem may be necessary before a complete preventive measure can be addressed. In cases such as this, corrective actions should be identified first, including the disposition of the product, so that preventive measures can then be addressed. If getting an area released in a timely matter seems to be a problem, discuss it first with the IIC at weekly exit meetings. If this does not resolve the issue, then you can contact the Front Line Supervisor and District, if necessary.

I would like to say that if the same area has had repeated problems with sanitation issues (as an example) and NRs are issued each time, the preventive measures should not be the same on each NR since the preventive measures on NR # 1 were either not effective or not applied. Preventive measures should be meaningful and implemented.

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13. Some inspectors are not accepting any preventive measures and the plant has to take everything to the IIC. Why won't the inspectors writing the NR accept the preventive measure without having to go to the IIC?

The IIC may be setting limits on what is acceptable. This may cause the inspector writing the NR to be extra cautious and ask the IIC to take a look before signing off on the NR. If this seems to be an excessive problem, talk it over first with the IIC, and then further up if necessary. Again, let me stress that if this is an area that is repeatedly found with a deficiency and past NR preventive measures have not been successful, then it would be hard for the inspector to accept the same preventive measures a second time.