

# Texas Poultry HACCP Roundtable

February 23, 2006

**Notes:** Thanks for the attendance at the February edition of the HACCP Roundtable. There were some good questions. Thanks again to Dr. Jennifer McKean for taking the time to address these questions and visit with us. The next roundtable will be held in May 2006. I will send e-mails when a firm date has been set. If you will not be able to make it to the May roundtable, but would like pose some questions to the USDA representative, please e-mail them to me and they will be presented.

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## Questions

1. What is the status of HIMP?

*There will be no new chicken HIMP plants. Current HIMP plants will stay under HIMP inspection. Eventually, HIMP and traditional inspection will be changed to deploy inspection resources most effectively, but no information on the type of inspection or dates of implementation as yet. Team-based and Risk-based inspection will be implemented first.*

2. What is new with *Campylobacter*?

*Agency is looking at Campylobacter as a possible food safety concern. However, there are no samples being taken right now..*

3. In the training manual given at the EIAO / FSRE training for industry, under the SSOP section referencing 9 CFR 416.15 and 416.16 it states; 'There must also be a written record of any corrective actions required by 416.15. These records must be maintained daily. The establishment has until the beginning of the same shift the following day to complete these records.' Is this saying that SSOPs, if complete do not have to be turned in until the next day?

*Yes. The plant does not have to have complete SSOP records until the start of operations next day. Note that this is different from HACCP recordkeeping requirements.*

4. What will be the key focus on allergens? Storage? Labeling? Is there a time frame on which to expect allergen regs?

*Key focus is Hazard Identification and Hazard Analysis with proper labeling. The regulations will most likely follow in FDA's footsteps (i.e. they won't be much different than FDA regulations). Currently allergen labeling is voluntary.*

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<http://www.fsis.usda.gov/Frame/FrameRedirect.asp?main=http://www.fsis.usda.gov/OPPDE/larc/Ingredients/Allergens.htm>

5. Are inspectors supposed to check product in a reprocessing barrel prior to the product being placed on the line? It is the establishment's understanding that only the IIC is supposed to check the barrels.

*Offline inspectors or the IIC can check these barrels in a HIMP plant. The IIC is responsible for overall process control at reprocessing, but the off-line inspectors can provide input on process control and look in the barrels.*

6. The plant is experiencing lines being stopped each and every time the CI's observe a tumor of any size or if a bird is presenting breast side. The plant hasn't failed OCP-2's. Should the lines be stopped?

*This is a safety issue. The CI is not supposed to touch the birds with the line running, so the line has to be stopped to turn birds around, manipulate birds, etc.*

7. During a correlation with the QA Supervisor, plant management and a new veterinarian concerning sep-tox birds and airsac findings, the vet abruptly stated, 'That's enough talk. I have work to do.' The vet then walked off. How is the plant supposed to know what to call if the vet won't spend the time to explain what they call defects?

*Vets need to correlate. If they don't have time at that moment, then a later time should be scheduled for later in the shift or soon thereafter. Since there have been a lot of vet hires in the past few months, there should be a decrease in staff shortages.*

8. Are necks required to be removed when the birds are being reprocessed offline?

*There is no requirement (regulation) that says that the neck has to be removed. The birds need to be in a ready-to-cook state as defined in 381.1.*

## Texas Poultry HACCP Roundtable

February 23, 2006

9. The plant has been told by an IIC that once feed goes into the digestive tract it is considered feces and the descriptives such as texture, consistency, and color are no longer a consideration. The bird that was being used as an example still has the stomach with some feed in it and some gall stains. Are the descriptives no longer being used in the determination of fecal contamination?

*Any material that is being called feces should follow FSIS Directive 6420.2 Attachment One, which describes color, consistency, and composition to aid inspection personnel in identifying feces in poultry. Stains are not considered feces.*

10. What are the procedures for looking for airsac during Food Safety and / or OCP test (concerning digging and probing into the cavity of a bird)?

*Inspectors should be able to see clearly at the reprocessing station (there should be 200 fc light). However, they should not be making additional cuts to see in the birds or tearing the birds up to see inside..*

11. Can you clarify the appeal steps? Some plants are asked to send all appeals directly to the front line supervisor.

*IIC (vet or inspector), then to Front-Line Supervisor, then to District is the normal stepwise process for appeals. If there are relief personnel at the establishment, contact the FLS regarding whether appeals should be sent to relief personnel. There is an entry for each step in PBIS.*

12. Concerning processed product being exported to Mexico: Do the chickens have to be tested or can they just be produced at approved facilities?

*See 7b under Documentation Requirements in the Export Library for Mexico.*

<http://www.fsis.usda.gov/Frame/FrameRedirect.asp?main=http://OFO/export/MEXICO.htm>

*Product intended for further processing in Mexico (including mechanically separated, fresh/frozen chicken, frames, and offal) are not required to be tested for AI.*