

Texas Poultry HACCP Roundtable

March 6, 2008

Notes: Thanks to all of the participants in this roundtable. Dr. Jennifer McKean from Dallas District FSIS answered the questions for this period. As always, if I can be of assistance, please call or email me, and I will do what I can. (mdavis@poultry.tamu.edu)

Michael Davis, Asst. Prof. & Extension Poultry Specialist

Questions

- 1. If an inspector places a tag, does the tag have to remain on the equipment (or whatever is tagged) until the IIC approves the removal and any further planned actions? If the inspectors tag off something, don't they have the authority to remove their own tag and release whatever is tagged?**

It is appropriate for the inspector to discuss corrective actions and preventive measures with the supervisory chain before removing a tag.

- 2. We are having issues with inspectors stopping the lines for a single tumor on a bird, bruises, etc. This is causing the plant down time. We were told that the inspectors were told to stop the line because removing a bird with the line running is a safety issue, they could get their hands caught in the shackles? Please explain the correct procedure.**

Why are the inspectors removing the birds? We do not want inspectors injured by being caught in the line, but I am not sure why they are taking birds off the line.

- 3. The plant requested the IIC to release the plant's On-line Reprocessing from the IIC's suspension. The IIC did a test and found one bird with a partial kidney and then refused to release the OLR. What are the guidelines concerning the suspension of OLR and its release?**

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Is this on-line reprocessing for digestive tract contents or on-line airsac salvage? I need more information to answer the question.

In general, if the process is out of control, the IIC should not permit the process. The IIC needs to make a determination about process control.

- 4. Our plant produces 10 lb. bags of product and then four bags are put into boxes, the boxes then go to the master scale (it weighs the product and we sell the product at that weight) just prior to entering the cooler.**

The plant uses clear bags and bags that have a 10 lb. label on them. The product is sold as a 40 lb box to the customer. Should the checks for Maximum Allowable Variance be performed on the individual bags or the box?

If the 10-lb bags are a consumer package with the weight declared on them, the net weight testing should be done on the 10-lb bags. If the bags are clear, and the only declared net weight is on the 40 lb box, then only the 40 lb box should be weighed.

- 5. If a bag of product didn't seal properly and the bag is dumped back into the bagging machine chute, is the product adulterated if it touches the outside of the bag in the process? The bags are made from a roll of plastic by the bagging machine just before the product is dropped into it; the outside of the bag should be sanitary.**

I would have a hard time calling this product adulterated in this scenario.

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6. Has the Sanitation Performance Standards changed regarding condensation, especially concerning stainless steel (drip pans mainly)? There has been some changes concerning this issue. When asked when and why the standards changed, we were told that inspection (did not specify if it was at IIC, FLS, District, or higher) has changed they way they look at it. Please explain. If there is a new version of the Sanitation Performance Standards Compliance Guide, we need one.

There are no changes we are aware of. The inspectors need to use the methodology discussed in 5000.1.

7. Please explain the procedure that inspection is to follow when doing lock-out/tag-out. Please describe the time tables as far as how long it should take to do lock-out/tag-out and Pre-Op. We are getting inspection taking 20 to 30 minutes for lock-out/tag-out and spending several minutes on each unit during Pre-Op.

The IIC/FLS should determine how long it takes to do lock out/tag out in a particular plant. On average, this should be 10-20 minutes, depending on the size of the plant, the amount of equipment to lock out, the amount of walking time, etc.

It should only take 1 minute to inspect each unit. We allow walk time between units. The amount of total time for pre op should be based on the number of areas, number of units, and the amount of time for lockout/tagout, plus some walk time. The supervisor or FLS should have a good idea of whether the times are reasonable.

The attachment to FSIS Directive 5000.1 explains how many units and how many areas are to be inspected in slaughter establishments.

8. Pre-op: The plant has been told that the procedure for Pre-Op is that if an item is found to be unacceptable, it will be tagged, the inspector will then move to the

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next area. When it is time to re-inspect the item that was tagged, the inspector will inspect that item and then as many as they need to make sure the area is clean. When it was mentioned that extended inspection was no longer in effect, the IIC agreed but said that this isn't extended inspection and that they will check as many items as they need to "feel comfortable that the area is sanitary".

This needs to be discussed with the supervisor.

9. What is the definition of whole bird contamination?

A bird that is too contaminated with digestive tract contents to make a disposition on would be condemned for contamination. This would also include birds contaminated with foreign materials or other adulterants to the extent that they could not be made wholesome.

10. Should the plant receive an NR for Post-Chill if no product is retained?

A plant would receive a NR when the process is out of control as defined in the regulation 9 CFR 381.76. The plant has lost control when the retest fails.

11. Looking at the possibility of reusing water from the IOBW. Microbial counts have been very low with *Salmonella*, *E. coli*, and coliform counts negative. Total plate counts are in the single and double digits. The water is chlorinated prior to the IOBW. Would it be necessary to re-chlorinate the water before use in the picking room?

The establishment needs to be able to demonstrate that they have reduced physical, chemical, and microbiological contamination. If they can do this without rechlorinating the water, then they would not be required to do so.

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- 12. It is the understanding of the plant from a conversation with NCC and Dr. Peterson that 'USDA should not be taking regulatory action based on one bird entering the scalders'. Should this be a multiple bird issue? What is the position of the Dallas District on this issue?**

Our position has been to take a regulatory control action for a live bird entering the scalders. This was based upon previous discussions and emails from the DVMS group.

- 13. There have been some issues with turning in made-available NR's a few days too late. In 5400.5 that the NR's should be turned in by the end of the tour of duty. Is this OK?**

This is our expectation as well.

- 14. What is the latest on Risk-Based Inspection?**

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There is still information on the FSIS webpage. The most recent information was published in February 2007. Risk based processing inspection will not be implemented in accordance with the posted timeline since it was not funded.

[http://www.fsis.usda.gov/Regulations & Policies/RBI in Processing/index.asp](http://www.fsis.usda.gov/Regulations%20&%20Policies/RBI%20in%20Processing/index.asp)

The Agency is still looking at risk-based poultry inspection. There will be another NAMPI meeting on this topic on March 28, 2008.

[http://www.fsis.usda.gov/Regulations & Policies/National Advisory Committee on Meat & Poultry/index.asp](http://www.fsis.usda.gov/Regulations%20&%20Policies/National%20Advisory%20Committee%20on%20Meat%20&%20Poultry/index.asp)

15. The plant is not receiving Directives anymore. How do we get back on the list?

The Agency has reduced mailing costs since all Notices and Directives are available electronically. The establishment should sign up for the automated email service that sends a notification when a new Directive or Notice is published. It will contain a link to the new issuance so it can be printed.

16. Industry feels like a significant number of NR's are being written without adequate support for the non-compliance. The writing of the NR's seems to be based on the potential for non-compliance. Is there any discussion at the District level concerning these types of NR's?

We review NRs on a monthly basis as part of management controls and provide feedback to the FLS, particularly on NRs where there is either no basis for the NR or when the regulatory citations, ISP code, or other information appears incorrect. If there are specific NRs, please talk to the DM or one of the deputies.

17. Does the District feel like they are getting too many appeals of NR's?

No. We receive very few appeals.

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18. Can you discuss FSIS employees following plant GMP's. Is there any course of action that the plant has in regard to this issue?

FSIS employees are to follow plant GMPs. If they do not follow plant GMPs, this should be brought to the attention of the supervisor. If the supervisor does not address the issue and resolve it satisfactorily, then the plant should contact the next level of supervision.