

# Texas Poultry HACCP Roundtable

## May 5, 2005

### Questions

1. We have been told in the past that inspectors should combine alike ISP Code noncompliances. Is this still true? Example: receiving 3 06D01 NR's in the same shift by the same inspector.

*Considered to be a district issue. Tech Center advice is not to separate. This keeps the system from having continuous open NR's. We know the reason for the high numbers, and this is not necessarily a problem. 06D01's are not the what triggers an EIAO audit.*

2. In relation to question 1, the IIC's are telling inspectors not to combine alike ISP Code NR's.

*See answer to Question 1.*

3. A rotation of floor inspectors has occurred between 1<sup>st</sup> and 2<sup>nd</sup> shifts. There seems to be a competition to find problems on the alternate shifts.

*Mr. Almanza does not tolerate quotas or races between inspectors to find deficiencies. This is not the mission of USDA. If the case outlined in the question is occurring, then maybe we should look at the individual inspectors and determine if they are not busy enough and need more plants to cover.*

4. During the February meeting it was stated that inspectors should not go onto the floor just to find a noncompliance. There are times that the IIC is not on the floor until Friday, and will come down and not leave the floor until a noncompliance is found. Other times the IIC will come down in the middle of the week, find a noncompliance and not be seen again on the floor for the rest of the week. Is there a quota on NR's?

*Again, there is not a quota on NR's. NR's should reflect the condition of the plant. No plant is perfect. Food safety is the bottom line and that is what we are looking for. Not opposed to plants not receiving NR's.*

5. While performing a Finished Product standard test at prechill, the process is determined to be out of compliance. Can the plant consider a retest as a scheduled test if it is time to perform the scheduled test, instead of performing back to back tests (retest then scheduled)?

*No.*

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6. There is hearsay about a memo telling inspectors and IIC's to write all noncompliances found and not give the establishment an opportunity to take care of the situation. Is this true?

*There is no memo. If the noncompliance is important enough to point out to the plant, then a record should be kept in the context of food safety. Should not be writing NR's for a paper towel lying on the floor. Mr. Almanza stated that he would not instruct inspectors to write NR's on every noncompliance.*

7. Are all USDA personnel rotating? Is this a national or district program?

*All offline inspection personnel should be rotating.*

8. During weekly exit conferences, are meetings supposed to be between the IIC and management. There are instances where issues about inspectors would like to be brought up to the IIC at these meetings, but the inspectors seem to be in charge. The IIC might say 10 words during the 45 minute meeting.

*Needs more information. Bottom line is that the IIC has the final decision. The team concept is good, but there are specific issues with an inspector, request a one-on-one meeting with the IIC.*

9. Is there a regulatory requirement that the establishment weigh every case of product produced, and that a scale be present on the processing line?

*Not a regulatory requirement, but there must be a method to determine the amount of product in each container before it leaves the establishment.*

10. Why can't the plant hang reprocessed birds on the evisceration line where the plant determines that it is OK, as stated in Appendix 4 in HIMP draft 8?

*As long as the process is under control, this should not be an issue. If there are continued problems with this action, then it should be an issue, but only if the process is not under control. Will look into this specifically.*

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11. Concerning the agency's meaning of adulteration:

- a. The establishment retains raw product for age and for containing an odor. Due to these conditions, the establishment chooses to condemn the product.
- b. The establishment chooses to condemn the bottom layers of a pallet of raw product due to container condition.

Are both of these examples considered adulteration of product and does condemnation of product have to be documented on SSOP records?

*(a) Not necessarily adulteration. Depends on the strength of the odor. Establishment's decision.*

*(b) If this is an economics issue, then it is not adulteration. If the inner liner is intact, then there is no adulteration.*

*As far as records go, there should be some documentation, not necessarily SSOP documentation.*

12. The plant continues to receive NR's and fail Pre-Op inspection due to condensation on the ceiling above the scalders. This is after installing a stainless steel ceiling which is subject to Pre-Op inspection and is cleaned and sanitized daily. Past roundtable discussions have stated that cleaned and sanitized stainless steel would not be considered an issue for condensation over the scalders.

*This should not be an issue for failing Pre-Op inspection. Will look further.*

13. Please explain 9CFR part 381.3(b). Waiving of regulations in special cases such as a public health emergency or testing new equipment, procedures, etc.

*Have not seen this regulation used as justification for an NR. Will look further.*

14. What are the expectations in HACCP as far as water reuse is concerned?  
Recirculation, red water, etc.

*This issue is being looked at very closely. Will look further.*

15. If birds are vacuumed due to airsac, should these birds be counted as airsac if only a small piece of kidney is left in the crypts?

*All kidney should be removed.*

16. From previous roundtable: 12) Are NR's issued for OCP-1 (airsac) failure of Table 2 based on the number of birds tested up to a point or on the total number of birds to be tested for a shift by USDA? What did Mr. Almanza find out?

*All HIMP 1 Forms from the shift.*

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17. What warrants a process evaluation in evisceration? What determines if a plant's process is out of control?

*Related to Question 13. Should be concerned with food safety issues.*

18. Concerning recordkeeping. There are procedures that are part of the pre-requisite programs. If the situation is in control according this documentation does a deviation need to be documented on an SOP form? If the deviation is documented, is there still a reason for an NR?

*Anytime a deviation is noticed, it needs to be documented somewhere. If the deviation is caught by the plant, an NR should not be issued. If an NR is issued in this circumstance, appeal the NR.*

19. Why are open NR's an issue in some plants, but not in others? The IIC has stated numerous times that the establishment has 10 open NR's, but fails to mention that he has rejected half of them and sent them back to the plant. If an answer is accepted by the GS 9 on the floor, why is the answer not accepted by the IIC in the NR answer? Can the IIC reject NR answers?

*Open NR's are always a concern, though food safety issues are more pressing. Don't know why someone is rejecting an answered NR. As long as the answer addresses preventive and corrective issues and is not repetitive, the NR should not be rejected. Can appeal an NR if it is rejected. For the GS 9 question, the GS 9 should be able to make the decision. This goes back to the team concept.*

20. If an SSOP NR is issued, does the answer have to be added to the SSOP plan before the NR and plan are signed of by the IIC?

The Inspector needs to verify the answer before closing the NR.

21. Statements of concern made by the IIC during two shifts:

- a. S\_\_t is going to hit the fan here.
- b. It doesn't matter if the inspectors' OCP tests pass or not, I am going to catch them (the plant) anyway.
- c. No inspectors are to engage in conversation with plant people, because they (plant personnel) know too much already.

*Making comments like this is nonprofessional and not acceptable.*

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22. Plant received an NR for process being out of control because the IIC performed a process evaluation and found 7 of 12 birds with airsac. Requested that line speed be reduced from 75 to 60 bpm. A recheck found 1 bird with a piece of kidney in the crypt. IIC stated that the process was out of control and requested further slow down to 50 bpm. In the NR, no numbers are documented, only that 'repetitive incidents occurred'. The process evaluation was performed without cause, no Q.A. tests, USDA tests, or production test had found airsac. After the 1<sup>st</sup> findings by the IIC, the root cause was found, corrective actions taken. It would seem that finding only one small piece of kidney shows that corrective actions worked and the decrease to 50 bpm was unnecessary. Please advise.

*The plant shouldn't be in a position where this would happen. Tech Center advice would have been to completely stop the line.*

23. Plant performs corrective actions for a fecal finding (blade falling out of the opening cut machine). Further planned actions were maintenance checking the machine 3 times per shift for 5 days. IIC stated that after the 5 days were over and no more documentation was made, he would expect to be told and shown other further planned actions. Please advise.

*First corrective actions were enough.*

24. Are inspectors supposed to record when they perform an unscheduled task, even if there are no findings?

*Yes*

25. Will an EIAO auditor look at the percentage of time performing a task has resulted in an NR being written?

*No*

26. Will an EIAO auditor link SSOP operational / pre-operational findings if the corrective actions are different each time?

*EIAO's don't perform linking. Their starting point is PBIS findings.*

27. Is the USDA considering zero tolerance for *Salmonella*?

*No*

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28. Where does the USDA stand on condensation that is not over product, or that is not heavy enough to drip?

*Condensate is usually an indicator of improper airflow. Don't typically concern ourselves if the condensate is not a food safety issue. If the condensate is not over a food flow area, then the inspector can be liberal in the time allowed to remove the condensate.*

29. Waiting several weeks, even months, for appeals to be returned from circuit supervisor.

*Will look into.*

30. Has FSRE training for industry been scheduled?

*No, not yet.*