

Texas Poultry HACCP Roundtable

May 4, 2006

Notes: There was very poor turnout for this quarter's Roundtable. We had good discussions concerning AI and the impact that the ABC movie may have on the industry, and possible solutions. USDA representatives were Mr. Al Almanza and Dr. Jennifer McKean. The next Roundtable will be scheduled for August. When a firm date is set, we will e-mail the date. If you have questions that you like for me to submit, please e-mail them to me at mdavis@poultry.tamu.edu. As always, if there are any other problems or concerns that you have regarding the Roundtable or other areas in production or HACCP, please don't hesitate to contact me.

Michael Davis, Asst. Prof. & Extension Poultry Specialist

Questions

1. What changes can we expect from the district office as a result of the recent *Salmonella* initiative?

- a. Short Term

Nothing in the short term because of budgetary issues.

- b. Long Term

Don't know the exact direction that the agency is going. It is very early in the game. Have to wait and see. Hopefully, there will be more information by the next Roundtable.

2. What's new in the district office?

There are budgetary concerns at this time. The District Office has a new Humane Handling Specialist (Dr. Sheryl Beckett, District Veterinary Medical Specialist). Even though the Humane Slaughter Act does not apply to poultry right now, FSIS does expect establishments to utilize good commercial practices when handling live birds intended for slaughter. Dr. Beckett will be visiting poultry plants later this year to discuss the Federal Register Notice that was issued in September 2005 and to observe handling of poultry.

The budget does allow for the hiring of in-plant personnel, including veterinarians, food inspectors, and Consumer Safety Inspectors. Dr. McKean is still recruiting new veterinarians all the time. There will be no new hires at any position above Front Line Supervisor at this time.

3. Is there a difference between a formal 30 day letter and an 'informal' 30 day letter?

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A 30-day letter is non-regulatory. There is no difference in a 30-day letter from the District or one from the IIC. It is nice if you respond in writing to the letter, but you do not have to respond in writing. The objective is to provide clarification to the issuer about the questions raised in the 30-day letter.

4. Will the FSIS personnel in the Dallas district begin to recognize the growing, conventional wisdom that there is no direct correlation between fecal material and the presence of *Salmonella*? How will that affect local inspection and front line supervision?

District office personnel recognize this, and are making an effort to get the point across. You still have to meet the zero-tolerance standard (381.65e), but this is not linked to Salmonella contamination. We hope that everyone has interventions directed at Salmonella other than zero-tolerance, since 381.65e is not an intervention strategy for Salmonella.

5. What can industry do to make these meetings more productive / better for USDA?

The questions that are raised at each Roundtable are good. However, some of the more complicated questions could be e-mailed to Dr. Davis or directly e-mailed to Dr. McKean so that any research could be done beforehand. That way it won't take as long to get the answer back to you and up on the web.

Maybe could look at bringing a Front Line Supervisor to one of the meetings.

Maybe could pool the resources of more than one company (or one company only) and have Mr. Almanza or Dr. McKean come to a complex and discuss issues.

6. What percent of FSA's result in NOIE's?

It varies based on the reason for the FSA. It also varies based on the number of FSA's that a plant (or corporation) has been through. Note that NOIE's are appealable as far as 'do the documented issues rise to the level of food safety regulations'.

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As far as FSA's that are just poultry related and are not triggered, Dr. McKean or Mr. Almanza will get this information.

7. Regarding fecal appeal procedure: Who is responsible for holding the bird if the plant wants to appeal a fecal call?

*If the USDA holds the bird, then the plant complains.
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These should be resolved at the plant. If you plan to appeal, at least take some high quality photos.

8. Regarding Vet shortage: Is there truth about the rumor concerning removing Vet's and replacing them with GS-9 supervisory positions?

Concerning new hires (vets), there are only 2 positions open in East Texas right now, although not all of the new hires have completed training and reported yet.

The GS-9 supervisory positions are not connected with the vet shortage. This is concerning team inspection, and it allows for vets to be able to travel, to perform other duties such as EIAO assessments. The GS-9 Supervisory Consumer Safety Inspector is a supervisor, thus there will be supervisory oversight of the inspection team when the vet is not present.

9. Have all poultry plants had an FSA? What is going to be the frequency for FSA's if not triggered?

Not all poultry plants have had FSA yet. We would like to finish one assessment in all of them, but that project is on hold right now. The main focus (region wise) is Dallas, Houston, San Antonio, and El Paso, due to budgetary concerns.

10. Regarding biosecurity: Where do you think that we are going?

Right now the agency is gathering data to see what kind of plans that various plants have and how good they are. FSIS just released a Notice on a survey that is going out. This will determine if any rulemaking action is necessary.

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11. Regarding *Salmonella* meeting: If a plant has been Category I for years, can we expect an increase in the line speed. If so, then what is the timetable for an increase?

No idea on the timetable right now. Possibly later this year or early next year.

Notes from Mr. Almanza:

- USDA is very concerned with *Salmonella* numbers within the poultry industry. It seemed that the industry was on track to reduce this pathogen. However, the new numbers have shown that *Salmonella* incidence across the industry is rising again. The newest numbers show that there is no difference now in incidence than when testing and HACCP started.
- Concerning NR appeals: there are a fair number of appeals, and Mr. Almanza has added another step in response. District is looking at how NR's are being written more critically to make sure that that what is written down is done correctly. If an NR is written incorrectly (as with correlation issues), then that NR should be appealed.
- If you appeal an NR to district, make sure to send the NR, appeal letters to IIC and Front Line Supervisor, and answer letters from IIC and Front Line Supervisor before you send the appeal to district. This helps to speed up the process, because they will ask you for this information before considering the appeal.