

Texas Poultry HACCP Roundtable

September 6, 2007

Notes: As always, if I can be of assistance, please call or email me, and I will do what I can. (mdavis@poultry.tamu.edu)

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Questions

- 1. Is there a place on the FSIS website to look at plant numbers and categorization for the new *Salmonella* testing schedules?**

This site does not contain plant numbers but it describes how FSIS categorizes plants and schedules Salmonella sets.

FSIS Scheduling Criteria for Salmonella Sets in Raw Classes of Product
http://www.fsis.usda.gov/Science/Scheduling_Criteria_Salmonella_Sets/index.asp

- 2. Should the evisceration lines be stopped when a small amount of foreign material is found (i.e. rubber particles, black grease, etc.)? Corrective actions and further planned actions must be given per USDA, and if deemed not acceptable, the lines are not re-started until the preventive measure is deemed acceptable.**

It depends on the frequency of the findings and the amount of affected product. For an ongoing problem that affects significant amounts of product, regulatory control action is appropriate.

- 3. What position do you have regarding the performance of a prerequisite program? What is considered a failure with regard to a prerequisite program? If a prerequisite program that is used to justify a hazard is not significant and the action line established in the prerequisite program is deviated from on one check, what does this bring into question on your hazard analysis?**

The pre-req. program is supporting documentation. This takes care of things that are deemed not likely to occur. You will have to address a corrective action, but this should not lead to a re-assessment of the hazard if it is an isolated incident. However, if there is a trend, then re-assessment of the hazard may be necessary.

- 4. Explain how compliance is evaluated for deviations to a critical limit and how this is associated to a deviation of a CCP. If all parts of 9CFR 417.3 are completed, does this mean that the CCP has failed? (Do deviations equal failure?)**

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The deviation corresponds to the CCP. This does not mean that a system or process failure has occurred. This is what the HACCP System and CCP's are designed to do. There should not be a system failure unless trends are developed.

- 5. What are the expected issue items (frocks, hairnets, boots, etc) an establishment should give agency personnel?**

Personal protective equipment such as ear plugs or ear muffs, hardhats, and skid resistant boots are provided by FSIS or reimbursed, and should not be provided by the establishment. FSIS also provides cut-resistant gloves, aprons, and protective nitrile gloves.

If an establishment requires frocks, uniforms, hairnets, or beardnets, or other items in order to meet their GMPs or SSOPs, they must provide these items. If there is a question about providing a specific item that is not addressed, please call the Dallas District Office.

- 6. Clarify how hanging plastic can be used to control drips, condensate, debris, etc. until the establishment can implement the permanent fix. (This means plastic within reason, not weeks of plastic use. And also that the establishment has an action plan proposed to fix the situation permanently.) It has been stated by the IIC that hanging plastic as a temporary measure to prevent contamination of product or product contact surfaces is no longer acceptable.**

Ongoing issues should have permanent fixes. Spot problems should be able to be taken care of with some method until a permanent fix can be established. This would include the hanging of plastic to keep adulteration from happening.

- 7. During a pre-operational inspection, inspectors are not releasing the area after corrective actions are given until the IIC approves the corrective action response. If the IIC is not present, then downtime is incurred.**

The inspector that is doing the pre-operational inspection should be able to release the area.

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- 8. When USDA verifies line speed, should they manually verify it, or is looking at the setting on a control panel sufficient?**

The inspector should manually time the line.

- 9. An establishment has a GS8 and a Vet doing preoperational inspection. Do we have to pay both of them to complete this task? Does it require two personnel to complete a normal preoperational inspection?**

Both personnel should not be there all of the time. The IIC will routinely make supervisory observations of the inspector performing pre op, and this is charged to the plant.

- 10. What is the allotted time to be spent inspecting each piece of equipment during a preoperational inspection by the agency? Is the guideline 1 minute?**

The establishment equipment should be broken down into one minute units. Generally, it shouldn't take more than 1 (one) minute, unless multiple deviations have occurred on a specific piece and there is a trend.

- 11. When doing early pre-op for pipes and pumps, is the criteria the same as regular pre-op? (i.e. if nothing is found, then move on to the next item, or keep breaking down pipes until something is found)**

Unless there is a good reason to break down a pipe, then move on. Break down pipes where problems are most likely to occur.

- 12. If the Texas HACCP Roundtable is organized in conjunction with a Processor's Workshop, what participation could the Dallas District provide? (i.e. regulatory overviews, etc.)**

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The District Office should be able to arrange for a speaker, or would participate in a roundtable with questions and answers. Please contact Dr. McKean with additional information about topics or formats that would be desired.