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Making a Food Defense Plan Functional: It Won't Help If You Don't Use It!

By LTJG Kazuhiro Okumura, U.S. Public Health Service Commissioned Corps

Food Defense Plan Security Measures for Food Defense

Establishment Name: _____
Establishment Location (city, state): _____
FSIS Establishment Number: _____

In *Small Plant News*, Volume 3, Number 5, the article "Developing Food Defense Plans: Shifting Greater Awareness Into Action" discussed why you should adopt a food defense plan, its benefits, and the process in developing a plan.

Nick Bauer of the U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service's (FSIS) Office of Data Integration and Food Protection gives five reasons why you should adopt a food defense plan. It:

1. Helps to protect your product and customers.
2. Helps to maintain a safe working environment for employees.
3. Increases establishment preparedness and facilitates an appropriate response to an emergency.

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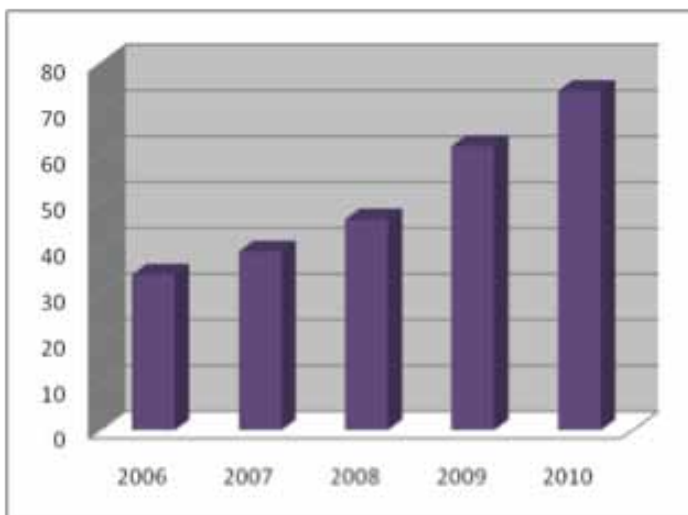
4. Enhances establishment security.
5. Helps to protect your company's bottom line.

“Having a food defense plan is an effective way to reduce the risk of intentional tampering or contamination of your products. FSIS is encouraging businesses to not only have a food defense plan, but to make sure it's also functional,” said Bauer.

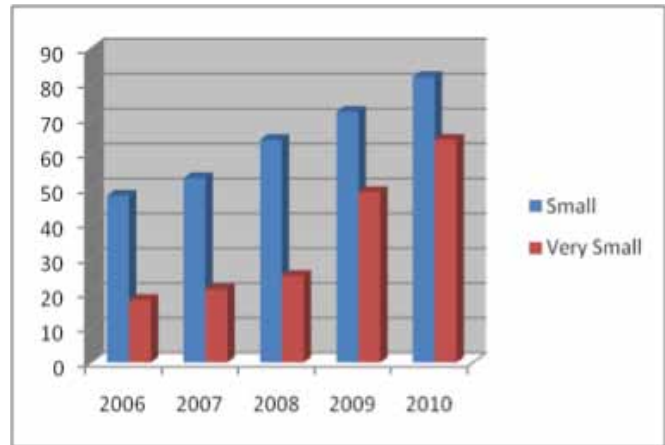
So, what is a functional food defense plan? There are five elements:

1. Conduct an assessment of your business and facility.
2. Develop a food defense plan that can adequately protect your business and products.
3. Implement the plan.
4. Test the plan. This is a key difference between simply having a food defense plan and having a functional one. Every functional food defense plan must be tested to make sure it works. A plan on paper may look and sound good, but it may be a different story when it is put into action.
5. Review and maintain the plan. Any changes in your operations and the results from testing should be considered, and your food defense plan should be revised to incorporate any corrective actions you identified. The plan should be reviewed at least once a year.

Percentage of Plants With a Functional Food Defense Plan



Percentage of Small and Very Small Plants With a Functional Food Defense Plan



For those of you who have a food defense plan, how do you know it is effective? Will it work when you need it? In other words, if your facility was targeted for an intentional attack, will the plan help minimize losses to your business and your customers?

There has been an upward trend in plants adopting functional food defense plans across all establishment types and sizes. FSIS conducted a survey in August 2010 and found that 74 percent of all plants had a functional food defense plan, which represents an increase of 12 percentage points from December 2009. A total of 82 percent of small plants and 64 percent of very small plants had a functional food defense plan, compared with 72 percent and 48 percent, respectively, in December 2009. Detailed results of the August 2010 survey can be found at www.fsis.usda.gov/Food_Defense_&_Emergency_Response/Food_Defense_Plan_Survey_Results/index.asp.

A copy of the general food defense plan, *Food Defense Plan: Security Measures for Food Defense*, can be found on the FSIS Web site at www.fsis.usda.gov/PDF/General-Food-Defense-Plan-9-3-09%20_2_.pdf.

FSIS has many resources to help you develop a food defense plan and make it functional on its Web site at http://www.fsis.usda.gov/Food_Defense_&_Emergency_Response/index.asp. You can also request assistance on food defense guidance materials by contacting the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or by emailing InfoSource@fsis.usda.gov. The Help Desk is open from 8:00 a.m. – 4:00 p.m. ET, Monday through Friday.

For policy-related questions, please call the FSIS Policy Development Division at 1-800-233-3935 (6:00 a.m. – 5:00 p.m. CT, Monday through Friday, except on Federal holidays), or submit a question to [askFSIS](http://askfsis.custhelp.com) at <http://askfsis.custhelp.com>.

Revised and New Performance Standards for *Salmonella* and *Campylobacter* in Effect

By Jane Johnson, DVM

On March 16, 2011, FSIS announced the implementation of revised and new performance standards for verification sample sets aimed at reducing the prevalence of *Salmonella* and *Campylobacter* in young chickens and turkeys. The improved standards went into effect July 1, 2011. After 2 years of implementing the new standards, the Agency estimates that the new *Campylobacter* standards will prevent approximately 5,000 illnesses a year, and the revised *Salmonella* standards will prevent approximately 20,000 illnesses a year.

The revised and new standards include:

1. The movement of young chicken and turkey establishments to the highest scheduling priority due to the initiation of *Campylobacter* testing for these product classes.
2. Analysis of all sample sets scheduled for young chicken and turkey establishments for both *Campylobacter* and *Salmonella*, and analysis of follow-up sample sets responding to sample set failure for either organism analyzed for both organisms.
3. The new *Salmonella* standards accept 5 positive samples in a 51-sample set for young chickens and 4 positive samples in a 56-sample set for turkeys.
4. *Salmonella* performance Categories 1 and 2 for young chicken and turkey establishments will be applied exclusively for Agency internal analysis and quarterly aggregate reporting.
5. Web posting of a list of young chicken and turkey establishments that fail the new *Salmonella* standards (Category 3) for their last set will begin when sample sets scheduled for July 2011 are completed.
6. *Campylobacter* performance standards and sample set criteria for tracking and reporting to establishments are applied to results from the smaller of the two laboratory *Campylobacter* sample portions (1 mL), which detects higher levels of contamination, making the performance standards 10.4 percent for young chickens and 0.79 percent for turkeys.
7. *Campylobacter* sample set criteria for tracking and reporting 1 mL results are 8 positive samples acceptable per 51-sample set for young chickens and 3 positive samples acceptable per 56-sample set for turkeys.
8. *Campylobacter* results from the larger of the 2 laboratory *Campylobacter* sample portions (30 mL for chickens, 24 mL for turkeys), which detects lower levels of contamination, are used for Agency internal analysis.
9. Agency responses to *Campylobacter* sample set results will follow current *Salmonella* procedures for immediate followup testing for both organisms and for food safety assessments when necessary.
10. Category 1/2/3 results will be posted in quarterly aggregate reports for all establishments producing raw products subject to FSIS *Salmonella* testing, including young chickens and turkeys under the new standards.



If you have any questions or wish to receive more information, feel free to contact the Small Plant Help Desk at 1-877-FSISHELP, or email InfoSource@fsis.usda.gov. The Help Desk is open from 8:00 a.m. – 4:00 p.m. ET, Monday through Friday.

Commonly Asked Questions & Answers

Q. *Can a charitable organization custom slaughter livestock in accordance with 9 Code of Federal Regulations (CFR) Part 303.1 (a)(2) and serve the meat or meat food products derived from that custom slaughter to individuals who access the services of the charitable organization?*

A. No. Meat or meat food products derived from the custom slaughter of livestock can only be used by an owner, household members, non-paying guests, and employees. Individuals who access the services of the charitable organization are not “non-paying guests.” They are clients who receive services from the charitable organization.

BIFSCo Releases Guidance Document

By Jane Johnson, DVM



The Beef Industry Food Safety Council (BIFSCo) has posted a guidance document, *Guidance Document for Sampling and Lotting of Beef Products and Sample Analysis for Pathogens*, on its Web site. The document was introduced at the council’s ninth annual Beef Industry Food Safety Summit, held in Dallas from March 2- 4, 2011.

According to its introduction, it “provides best industry practices for components (lotting, sampling, and laboratory analysis) of the pathogen-testing program as a part of an overall food safety system.

It’s important to recognize that these are just components of the system, and their success depends on the proper implementation of the best practices leading to these steps and after these steps.” The document may be accessed at the council’s Web site at www.bifsc.org/CMDocs/BIFSCO/Sampling,%20Lotting%20and%20Sample%20Analysis%20Document%20FINAL%20SEPT%202010.pdf.