

Small Plant NEWS

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Small Plant NEWS

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Safeguarding the Nation from Small Amounts of Meat and Poultry from Unapproved Sources



By Natasha Williams

It's Monday morning and you're just settling in at work with a hot cup of coffee. Your cell phone rings; you answer it. To your dismay, you learn that your product coming in from overseas is being held up by the U.S. government because it is not from an approved source. This isn't the

way you want to start off the week. You've been counting on this shipment for production. Confused and frustrated, you start to think about the foreboding loss of thousands of dollars and wonder, "Why and how could this have happened?"

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Webinars Offer a Convenient and Easy Way to Learn

By Sally Fernandez

F SIS hosts regulatory webinars on a variety of topics including sanitary dressing, mobile slaughter units, and recall plans. A webinar is a conference that you attend through your computer—a no-cost, easy way to learn. FSIS webinars for each topic are offered on several different dates and times so that you can attend at your convenience.

Once you are joined into the event, you hear the speaker and view the PowerPoint presentation(s) at the same time. During the question and answer period at the end, you're encouraged to send an email or call if you have any questions or something was unclear.

FSIS' Web site features upcoming webinars with topics, dates, and times listed. Go to http://www.fsis.usda.gov/News_&_Events/Reg_Education_Videos/index.asp. Or you can click on "Find Resources for Small Plants" on the right side of the page. Then scroll down and follow these links: "Small and Very Small Plant Outreach" → "Education and Training Materials" → "Regulatory Net Meeting Webinars."

PowerPoint presentation slides are available before the webinar starts. The link to the webinar is accessible shortly



before the start time. Just click on it and you've joined the audience!

Of course, if scheduling conflicts prevent you from participating in any of the webinars you're interested in, you can call the Small Plant Help Desk at 1-877-FSISHelp (877-374-7435) and ask for the webinar presentations on CD.

Food Safety Resources

By Sally Fernandez

There's a quick and easy way to find resources for small and very small plants. Just go to the FSIS home page at www.fsis.usda.gov and look on the right-hand side of the screen. There you'll see "I Want To..." in a blue box with a bulleted list underneath. Clicking on one of these bullets will immediately link you to the topic.

- **askFSIS an Inspection-Related Question** – Click on this link to submit your question to FSIS experts or look for an answer in a database of questions and answers on topics such as exporting, labeling, inspection, programs, and procedures.
- **Apply for a Grant of Inspection** – This sends you directly to a step-by-step package, complete

with links to the information and forms you need.

- **Report a Problem with Food Products** – This connects you to information about which government agency is responsible for which products. There's also another link that takes you to current recalls and alerts.
- **Find Resources for Small Plants** – This sends you to a Web page designed especially for you with links to all the basic information you need. From this page, you can read all the archived issues of *Small Plant News*, order free HACCP and food safety publications and DVDs, find out about free training classes, and get compliance assistance.

I Want To...

- Ask a Food Safety Question (Ask Karen) or Chat
- askFSIS an Inspection-Related Question
- Apply for a Grant of Inspection
- Find Resources for Small Plants
- Attend a Public Meeting
- Export or Import Meat, Poultry or Egg Products
- Report a Problem with Food
- Watch Videos
- Visit the Food Safety Discovery Zone

All of this information and more is available at your fingertips just by clicking on the "I Want To..." box. You can also contact the Small Plant Help Desk at 1-877-FSISHelp (877-374-7435) or by e-mailing InfoSource@fsis.usda.gov. The Help Desk is open from 8:00 a.m. to 4:00 p.m. ET, Monday through Friday.

Commonly Asked Questions & Answers

Q. *Can I make a label bearing both “natural” and “organic” claims?*

A. Yes, if the product meets both the characteristics of “organic” (7 CFR 205) and “natural” (Policy Memo 55 in the FSIS Food Standards and Labeling Policy Book). Please note, however, that “natural” and “organic” are not synonymous.

Q. *Can natural smoke flavoring be listed as “natural flavor”?*

A. No, the labeling of natural smoke flavorings is covered by Chapter 9 of the *Code of Federal Regulations*, parts 317.2 (j) (3) and 381.119 (a), and by Policy Memo 117, “Smoke Flavoring.” Natural smoke flavoring may not be listed as “natural flavor” or “flavor” in the ingredients statement. It may be declared as “natural smoke flavoring” or “smoke flavoring.” Artificial smoke flavoring must be labeled as such.

Q. *Does the issuance of FSIS Notice 05-09, Measures to Address E. coli O157:H7 at Establishments that Receive, Grind, or Otherwise Process Raw Beef Products, mean that if a federally inspected establishment receives, or otherwise produces, raw intact beef products, they are to consider that the received or finished product is adulterated with E. coli O157:H7?*

A. No. The notice does not change current policy. Raw non-intact beef product contaminated with *E. coli* O157:H7 is adulterated unless it’s further processed to destroy the pathogen. Similarly, raw intact beef product that’s intended for use in non-intact product, such as beef manufacturing trimmings, is adulterated if it’s contaminated with

E. coli O157:H7, unless it’s further processed to destroy the pathogen. However, raw intact beef product, that is to be used intact, is not adulterated by the presence of this pathogen. According to Part 417.2 in chapter 9 of the *Code of Federal Regulations*, every official establishment needs to make determinations about whether the food safety hazards that they identify are reasonably likely to occur in their specific production process. If you’re asking whether a plant that produces a raw beef food product must address the potential food safety hazard of *E. coli* O157:H7, the answer is yes. The establishment needs to make a determination about this known pathogen in raw beef. If you’re asking whether the establishment is required to identify *E. coli* O157:H7 as a hazard that is reasonably likely to occur, just because it’s a raw beef product, the answer will depend upon the nature of the establishment’s process and the type of product it produces.

Q. *What areas should a food defense plan focus on?*

A. The plan should address:

- Inside and Outside Security
- Slaughter and Processing Area Security
- Storage Security
- Shipping and Receiving Security
- Water and Ice Security
- Mail Handling Security
- Personnel Security

For guidance on developing a food defense plan, go to www.fsis.usda.gov/Food_Defense_&_Emergency_Response/Guidance_Materials/index.asp or contact FSIS’ Policy Development Division at (800) 233-3933.

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Whether you're a large or small importing operation, or depend on a supplier who imports meat, poultry, or processed egg products, this situation can become an unfortunate reality if you're not aware of the changes that the U.S. Department of Agriculture (USDA) made to the process of reviewing import permits. Effective June 22, 2009, importers of food products that contain small amounts of meat or poultry will not be granted an import permit by USDA's Animal and Plant Health Inspection Service (APHIS) unless the Food Safety and Inspection Service (FSIS) first makes a determination that the product came from an approved source.

FSIS reviews whether the meat or poultry ingredient was prepared under specific conditions that ensure the ingredients are not adulterated. The ingredients must come from an approved source, which is prepared under FSIS inspection or under a foreign inspection system that has been found to be equivalent by FSIS.

Why has there been a change in the review process?

"We discovered that, for various reasons, products containing small amounts of cooked meat or poultry ingredients have entered the United States without an assurance that they come from approved sources," said Jerry Elliott, Director of FSIS' Import Inspection Division. "With food safety incidents involving what are traditionally considered low-risk food products, we need to be vigilant to protect consumers by ensuring the safety of all products under our jurisdiction."

To inform importers and all affected parties about the revised import permit process review, FSIS' Office of Outreach, Employee Education, and Training hosted, or partnered with outside associations, to hold several education sessions, in Anaheim, CA; Berkeley, CA; Elizabeth, NJ; Philadelphia, PA; and Washington, DC. At these sessions, participants learned what their responsibilities are when obtaining an APHIS import permit for food products.

"FSIS now has a direct role in issuing APHIS import permits," said Steve McDermott, Senior Director for FSIS' Office of International Affairs. "Importers are responsible for providing APHIS the permit application. Since the APHIS system allows supporting documentation with the application, importers can attach any supporting documentation that provides evidence of approved sources," he added.

This procedure may save time for the applicant since APHIS now forwards the permit application along with any supporting documentation to FSIS

for review. FSIS then reviews the documentation and verifies that the meat or poultry ingredients come from an approved source.

"If importers can provide documented evidence that the small amount of the meat or poultry ingredient included in the final product comes from an approved source, it can be imported into the United States, regardless of the equivalency status of the country producing or exporting the final product," said Elliott. "However, if this condition isn't met, then the imported food won't be considered approved for importation into the United States, and APHIS won't issue the permit."

Examples of supporting documents include a statement from a government agency from which the ingredient or product originated, a bill of lading, or invoice where the product was produced. In addition, if the importer has applied for an APHIS permit, the valid APHIS permit application reference number needs to be referenced on all supporting documentation.

If you're an importer or processor who depends on suppliers of imported products containing even a small amount of meat or poultry ingredient, you definitely need to know how the import permit review process works. Even if you're not directly affected by this, but know of others in the industry who import these food products, make sure they are aware of these guidelines.

In the past, FSIS played a secondary role to ensure that meat and poultry ingredients came from an approved source. Now, FSIS plays a direct role in verifying that the product comes from an approved source.

In addition, APHIS restricts some products from entering the United States because of animal disease conditions in the country of origin. Therefore, it still will be necessary to contact APHIS' Veterinary Services, National Center for Import and Export, for information on restrictions related to animal diseases and to obtain a permit from APHIS. You can call (301) 734-3277 or visit www.aphis.usda.gov to obtain an APHIS import permit application (VS Form 16-3).

FSIS' Office of International Affairs is also available to answer questions at (888) 287-7194 or by email at permits@fsis.usda.gov. There is also a reference tool titled Import Permit Guide for Products with Small Amounts of Meat and Poultry that is available in English, Spanish, Mandarin Chinese, Korean, and Vietnamese posted on FSIS' Web site at www.fsis.usda.gov/regulations_&_policies/Imported_Food_Products/index.asp.