

# Small Plant NEWS

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## Small Plant NEWS

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## Preventing the Production of Foods With Undeclared Food Allergens

By *Kazuhiro Okumura, LTJG, USPHS*

Imagine eating something and having a reaction that made it so difficult to breathe that you lose consciousness, go into shock, or even die. This is the risk that people with food allergies live with everyday. For some people, simply being in the same room with a particular food is enough to induce an allergic reaction.

People with food allergies must rely on being able to read the declared ingredients on labels to keep themselves safe. This has become a great concern to FSIS because the Agency issued a large number of recalls in 2011 due to allergens. In 2011, there were 48 recalls issued for undeclared ingredients. Undeclared allergens, potential public health hazards, accounted for 40 of those recalls. In 2010, 18 recalls were issued due to undeclared allergens; and, in 2009, 14 were issued. Many of these recalls could be traced back to when the product formulation was changed, or there was a change in a supplier's ingredient formulation that was not reflected on the labeling of the finished meat or poultry.

The U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) has identified root causes when recalls due to undeclared ingredients occur:

- The chemical (allergen) food safety hazard in a plant's hazard analysis has not been addressed;
- The establishment has failed to support the decision in the hazard analysis;
- The hazard analysis has not been reassessed; and
- Controls identified to mitigate the hazard have not been implemented.

Based on the highest number of cases in the population, there are eight foods that have been labeled as the "Big Eight Allergens." They are:

- wheat;
- crustacean shellfish (e.g., shrimp, crab, lobster);
- eggs;
- fish;
- peanuts;
- milk;
- tree nuts (e.g., almonds, pecans, walnuts); and
- soybeans.

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What are the steps you, as an establishment, can take to avoid recalls and potential harm to the public? Mark Wheeler of FSIS' Labeling and Program Delivery Division says, "Check with all of your suppliers to make sure that their formulation is labeled correctly, and make sure to declare all purchased ingredients correctly on the product label."

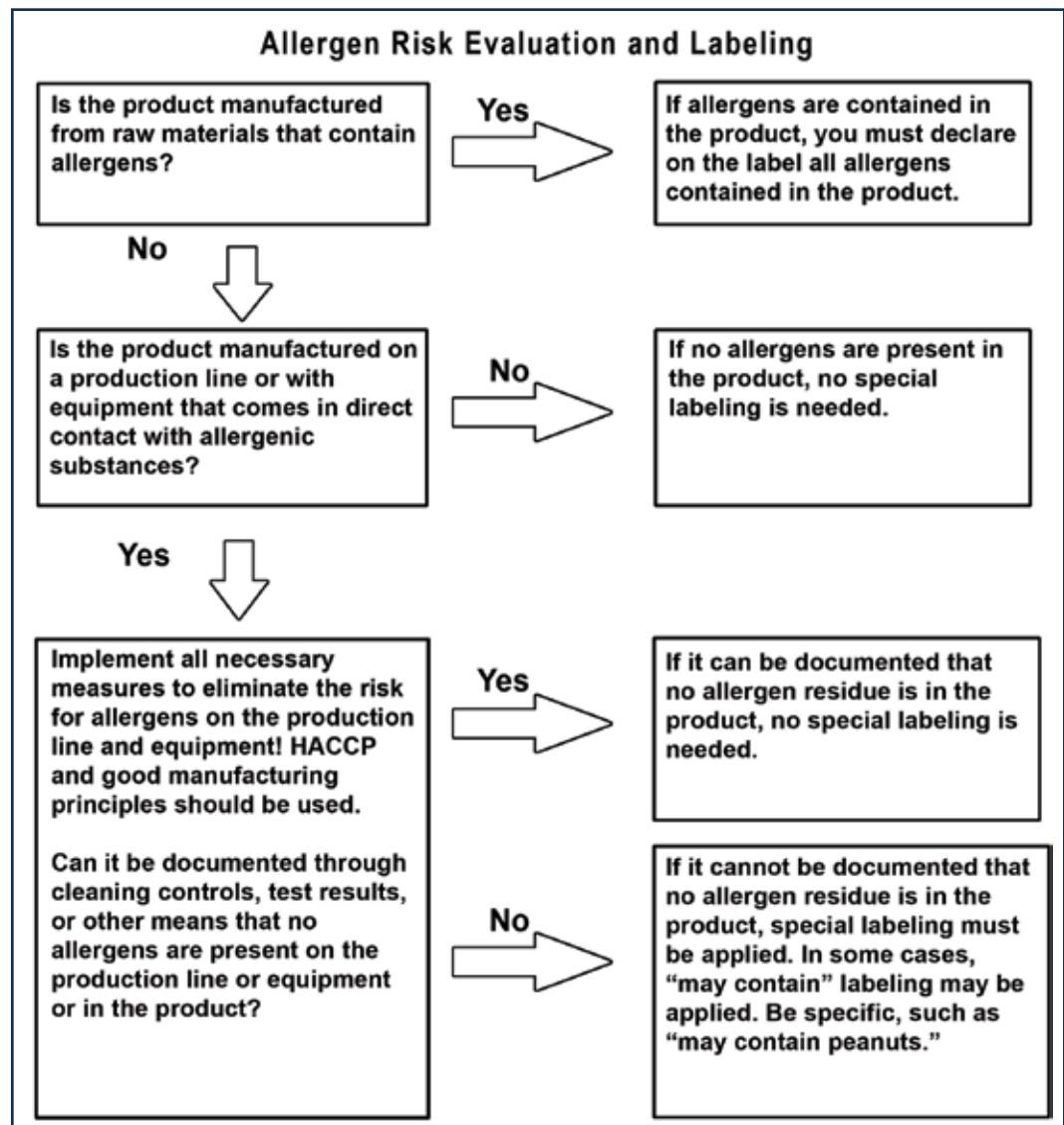
In addition, you want to make sure that the appropriate label is applied to each product and that your product is manufactured in accordance with the product formula in the labeling record. A review of any prerequisite programs and targeted Sanitation Standard Operating Procedures (SSOPs) is also a good idea to prevent any cross-contamination that may occur when producing multiple products.

Let's review what your responsibilities are by breaking down the process into three steps:

1. **Identify:** All ingredients going into your product must be identified before the assembly process. Inspect incoming non-meat ingredients by matching the label sketch and approval with the formulation to ensure label accuracy. If there is a discrepancy, the ingredients must be held from use until they are correctly identified and properly labeled.
2. **Prevent:** Your equipment must be designated or tagged if used for only allergenic ingredients, and sanitation and processing procedures must be in place to prevent cross-contamination. One simple step you can take to prevent cross contamination is to handle and process non-allergenic ingredients before handling and processing allergenic ingredients. Critical control points must be included within your Hazard Analysis and Critical Control Point (HACCP) plan, SSOPs, allergen control plan, or other prerequisite program that sufficiently and effectively prevents the potential for undeclared allergens.

3. **Declare:** Packaging and storing of allergenic and non-allergenic final meat products must also be separated and labeled immediately according to their correct contents. Labeling procedures must be in place to ensure that the final product accurately reflects the packaged product, and that product cannot be confirmed into commerce until the packaged product's label is approved.

If you have further questions on what you should do to prevent your product from being recalled due to allergens, contact FSIS' Policy Development Division through *askFSIS* at <http://askfsis.custhelp.com> or call (800) 233-3935. If your questions relate to FSIS' labeling requirements for ingredients, you may contact the Labeling and Program Delivery Division through *askFSIS* using the Web-link above or by calling (301) 504-0878.



# Do You Use a Systematic Approach to Humane Handling

By Jane Johnson, DVM

The U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) wants to remind all small and very small slaughter plant owners and operators that the agency recommends that you use a systematic approach to humane handling. A systematic approach focuses on treating livestock in a way that minimizes excitement, discomfort, and accidental injury the entire time livestock is held in connection with slaughter.

To develop and maintain a systematic approach to meet the humane handling requirements, FSIS has stated that slaughter plants should:

- (1) Conduct an initial assessment of where and under what circumstances livestock may experience excitement, discomfort, or accidental injury while being handled in connection with slaughter and, except for establishments conducting ritual slaughter, where and under what circumstances stunning problems may occur.
- (2) Design facilities and implement practices that will minimize excitement, discomfort, and accidental injury to livestock.
- (3) Evaluate handling methods periodically to ensure that they minimize excitement, discomfort, and accidental injury, and except for establishments conducting ritual slaughter, evaluate stunning methods periodically to ensure that all livestock is rendered insensible to pain by a single blow.
- (4) Improve handling practices and modify facilities when necessary to minimize excitement, discomfort, and accidental injury to livestock.

In the first step of a systematic approach, you should conduct an assessment of where handling and stunning problems occur. You should consider such factors as whether:

- (1) the movement of livestock is done with a minimum of excitement and discomfort to the animal and at a suitable pace;

- (2) the particular livestock's genetics, instincts, and behavior are taken into account in the handling of livestock in the establishment;
- (3) electric prods and other implements are used as little as possible to move animals within the establishment;
- (4) animals have access to water;
- (5) there is sufficient room in the holding pens for animals that are held overnight;
- (6) training is provided for establishment personnel in the appropriate and proper use of restraints and prods; and
- (7) potential weather and climatic conditions of the locale, especially for disabled livestock in the establishment, will lead to the inhumane treatment of animals.

In addition, you should also assess the stunning method used for your effectiveness in rendering animals immediately unconscious and to ensure that animals are being properly stunned before being slaughtered. You should also assess the training for your employees in the appropriate use of stunning and slaughtering equipment.

In the second step of a systematic approach, you should determine if you're in compliance with regulatory requirements by analyzing whether:

- (1) the pens, driveways, and ramps are designed and maintained to prevent injury or pain to the animals;
- (2) the pens are free of loose boards or openings, so that the head, feet, or legs of an animal will not be injured;

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# Nutrition Information Charts Available as Resources

By Jane Johnson, DVM



On March 1, 2012, FSIS began requiring nutritional labeling of the major cuts of single-ingredient, raw meat and poultry products, as well as on all ground or chopped meat and poultry products, with or without added seasonings, unless an exemption applies.

In order to assist retail stores that sell meat and poultry products to post point-of-purchase nutrition information, FSIS has created downloadable charts for printing. These charts show nutrition information for the major cuts of meat and poultry. Retail stores are welcome to download, print, display, and/or distribute them to consumers in close proximity to the relevant foods in the stores.

The charts may be accessed on FSIS' Web site at the following locations:

Chicken and Turkey  
[www.fsis.usda.gov/PDF/Chicken\\_Turkey\\_Nutrition\\_Facts.pdf](http://www.fsis.usda.gov/PDF/Chicken_Turkey_Nutrition_Facts.pdf)

Pork and Lamb  
[www.fsis.usda.gov/PDF/Pork\\_Lamb\\_Nutrition\\_Facts.pdf](http://www.fsis.usda.gov/PDF/Pork_Lamb_Nutrition_Facts.pdf)

Beef and Veal  
[www.fsis.usda.gov/PDF/Beef\\_Veal\\_Nutrition\\_Facts.pdf](http://www.fsis.usda.gov/PDF/Beef_Veal_Nutrition_Facts.pdf)

If you are without Internet access, call the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) for assistance.

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- (3) the floors of pens, ramps, and driveways are constructed so that an animal is not likely to fall (e.g., using cleated or waffled floors or sand on the floors); and
- (4) driveways are designed so that sharp turns or sudden reversals of direction are minimized, so that they are not likely to cause injury to animals.

FSIS has more guidance on developing a systematic approach, as well as information on other aspects of humane handling, posted on the agency's Web site at [www.fsis.usda.gov/Regulations\\_&\\_Policies/Humane\\_Methods\\_of\\_Slaughter/index.asp](http://www.fsis.usda.gov/Regulations_&_Policies/Humane_Methods_of_Slaughter/index.asp).

[www.fsis.usda.gov/Regulations\\_&\\_Policies/Humane\\_Methods\\_of\\_Slaughter/index.asp](http://www.fsis.usda.gov/Regulations_&_Policies/Humane_Methods_of_Slaughter/index.asp). Here, you'll find the humane handling statutes and regulations, FSIS directives and notices, enforcement reports, training materials (including the *Humane Handling of Livestock and Poultry* booklet, from which this article was taken), as well additional humane handling resources.

For questions or assistance in obtaining more information on humane handling, you may wish to contact the Small Plant Help Desk at (877) 374-7435. You may also send an email to [InfoSource@fsis.usda.gov](mailto:InfoSource@fsis.usda.gov).