

# Small Plant NEWS

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## Inside

**Protect Your Suppliers and Distributors** ..... 2

**Food Safety Resources** ... 2

**Briefs** ..... 3

**Compliance Guidance Issued for Small Plants** ... 3

**Handling Food Animals with Care** ..... 4

## Small Plant NEWS

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## How You Can Prevent Recalls



An FSIS scientist runs a test in the microbiology lab. (USDA photo)

By Jeff Tarrant  
LCDR U.S. Public Health Service

It is Friday night. Hermann Q. Fuerschlinger, jovial and beloved owner of Fuerschlinger's Better Meat Company (fictitious name and company), is preparing to take his family out to dinner. The phone rings. He picks up the receiver and wishes the caller a good evening, but his good mood quickly dissolves.

The speaker introduces herself as a representative of USDA's Food Safety and Inspection Service (FSIS). She informs him that the ground beef samples collected earlier in the week were found to be presumptively positive. Confirmatory test results are expected tomorrow morning. Mr. Fuerschlinger can't believe it. He asks, "Are you sure?"

She replies, "Yes. As a matter of fact, our folks need to meet with you as soon as possible to get product and distribution information so we are ready for your recall."

Mr. Fuerschlinger drops the phone into the cradle, hunger pangs rapidly being displaced by a sour stomach.

Could this happen to you? Or, more importantly, can you prevent it? In many cases, the answer is, "Yes."

### Pathogens—Test and Hold

Products sampled for microbiological testing may be either shipped or held pending the results. Shipping your product before the test results come back is perfectly legal, but it's not necessarily cost effective if there is a chance the test will be positive for a pathogen. Holding your product may be difficult, especially if the product has a short shelf life and storage space is at a premium. Furthermore, the vast majority of tests (over 12,000 tests for *E. coli* O157:H7 in 2006) do come back negative. However, the short- and long-term costs to your business of even one recall can be enormous.

In 2006, 10 of that year's 34 recalls (29 percent) could have been avoided if the companies had held their products until testing was complete. Therefore, although "test and hold" is strictly voluntary, FSIS urges establishments to hold product until testing results arrive.

### Allergens—Intensify Quality Control

An increasing number of recalls are due to undeclared allergens. FSIS refers to these as "ingredients of public health concern" because to some consumers with food allergies, exposure to even very small amount can be fatal. Milk, eggs, fish, crustacean shellfish, peanuts, tree nuts, wheat and soybeans are the most common "ingredients of public health

Continued on Page 3 ...

# Protect Your Suppliers and Distributors

By Keith Payne

**E**nsuring the safety of the food supply from intentional contamination is not just your responsibility as a plant owner or operator, but one that needs to be shared by all who handle food from production to the instant it is served on a plate. The amount of time, effort and pride you pour into your products can all be erased by one act of deliberate contamination before supplies reach your plant, or after your finished products leave your premises. As a small business, you can ill afford to have any product tampering associated with your brand, even if the deliberate contamination didn't occur within your plant.

That's why FSIS has developed the *Guide to Developing a Food Defense Plan for Warehouse and Distribution Centers*. Even though the agency is targeting the owners and operators of warehouse and distribution centers with the distribution of these resource tools, the next time you speak to your suppliers or distributors, you might want to bring up the topic of food defense and make sure they have a copy of this guidance document. And if you have a warehouse, put the guidance to use for your own operations as well.

In the December 2007 and January 2008 issues of *Small Plant News*, you learned about the importance of a food defense plan and reducing the insider threat. FSIS' new guide integrates these concepts to assist owners and operators in developing cost-effective food defense plans for warehouses and distribution centers.

However, the agency didn't craft the guide on its own. "We developed this guide in consultation with a variety of

warehouse and distribution center establishments," said Suzanne Rigby, executive associate of FSIS' Office of Food Defense and Emergency Response. "We wanted to make sure the information presented within the guidance document serves our target audience well by being beneficial, practical and achievable."

Three steps within the guide help owners and operators of warehouse and distribution centers take measures to safeguard their operations from intentional harm. Outlined broadly, these steps are:

- Conduct a Self-Assessment
- Develop a Food Defense Plan
- Implement Your Food Defense Plan

By using this guide, owners and operators can develop a food defense plan that is specific to their facility. "We want folks to keep in mind that not all of the guidance contained in this document may be appropriate or practical for every warehouse and distribution center," added Rigby. "As a small plant owner, we recommend you work with your suppliers and distributors; review the guidance and assess which preventive measures are suitable for their operations."

So, take some time and share this material with your partners in the food chain. The *Guide to Developing a Food Defense Plan for Warehouse and Distribution Centers* is available on FSIS' Web site at: [www.fsis.usda.gov/PDF/Guidance\\_Document\\_Warehouses.pdf](http://www.fsis.usda.gov/PDF/Guidance_Document_Warehouses.pdf). If you or others need help or have questions about this guidance, call FSIS' Office of Food Defense and Emergency Response at (866) 395-9701.

## Food Safety Resources

By Mary Gioglio

Today, more than ever, businesses must take steps to protect their products from intentional contamination and chemical, biological or nuclear threats. As we mentioned in the December 2007 and January 2008 issues of *Small Plant News*, one way to safeguard your business is to develop a Food Defense Plan and FSIS has the resources to help.

*Food Defense: Security in a Foodservice Operation* (DVD) was

developed by the South Dakota State University Cooperative Extension Service in partnership with FSIS. While the title implies it is for foodservice businesses, the information contained in the DVD can apply to any business. Assessing risks to your business, developing contingency plans, communicating the plans with your employees and putting those plans into action are all covered. In addition to the DVD, FSIS has published many guidebooks for developing food defense plans in meat and poultry plants, including *Developing a Food Defense Plan for Meat and Poultry*

*Slaughter and Processing Plants* (booklet).

These resources and others are available on FSIS' Web site at [www.fsis.usda.gov](http://www.fsis.usda.gov) or you can order copies from FSIS' *Food Safety Resources Brochure for Small and Very Small Plants*. A PDF of this brochure is found at [www.fsis.usda.gov/PDF/HACCP\\_Resources\\_Brochure.pdf](http://www.fsis.usda.gov/PDF/HACCP_Resources_Brochure.pdf) and the order form can be faxed to (202) 690-6519. There is also an online version of the brochure, where requests can be submitted electronically to [www.fsis.usda.gov/Science/HACCP\\_Resources\\_Order\\_Form/index.asp](http://www.fsis.usda.gov/Science/HACCP_Resources_Order_Form/index.asp).



## Briefs *By Sheila Johnson*

### Public Meetings

The National Advisory Committee on Meat and Poultry Inspection (NACMPI) meeting was held on February 5-6. The Committee meets biannually to discuss food safety issues and make recommendations to the Secretary of Agriculture. At this particular meeting, the NACMPI discussed FSIS' planned public health-based slaughter inspection system for young chickens and how a similar approach could be used for inspection in processing and other slaughter establishments. Transcripts, presentations and the committee's recommendations are available on FSIS' Web site at [www.fsis.usda.gov/News\\_&\\_Events/Meetings\\_&\\_Events/index.asp](http://www.fsis.usda.gov/News_&_Events/Meetings_&_Events/index.asp). Call (202) 690-6520 for further assistance in obtaining these materials.

### Methods to Ensure Effective Sanitation

Continuing its efforts to improve outreach to small and very small plants, FSIS is sponsoring a monthly seminar series covering a variety of technical topics concerning agency policies and new technologies of interest to industry. These seminars are offered to all participants at no cost and conducted via net meeting, which uses Internet access for viewing the presentation and a phone line for the audio portion. On April 16, 2008, a seminar titled *Methods to Ensure Effective Sanitation in Meat, Poultry and Egg Products Establishments* will be led by Robert Savage of the HACCP Consulting Group. This seminar will emphasize methods that small and very small meat, poultry and egg products plants can implement to ensure effective sanitation and thus safer products for consumers. To register for this seminar, call (800) 336-3747.

... Continued from Page 1

concern," accounting for over 90 percent of all reported food allergies in the United States.

It's essential that products declare these ingredients on the label if they are in the food. If they are not declared then the product is mislabeled, and product already shipped will need to be recalled.

How can you prevent a food recall due to undeclared allergens? According to Lisa Volk, director of FSIS Office of Field Operations, Recall Management Staff, "more double-checking of label and ingredient statements and better quality control could go a long way."

In many companies today, changing ingredient suppliers and multiple product lines can make their food production process complicated and make it a challenge to ensure all ingredients are absolutely controlled.

The responsibility to ensure that the food label accurately reflects the product rests with the company. FSIS recommends that operators double-check to ensure that product formulations match the ingredient statements. This is particularly important when suppliers of ingredients are changed. A seemingly insignificant change in the vendor or ingredient specifications may result in the unintended introduction of an allergen and, potentially, a recall.

By holding tested product pending the test results, and by double-checking that your ingredient statement is accurate and that there are no undeclared allergens—perhaps even making it a critical control point—you can avoid costly recalls, helping to protect public health and your bottom line simultaneously.

In the next edition of *Small Plant News*, we'll discuss what to do, if despite your efforts at preventing it, you are obliged to recall a product. For more information on food recalls, visit FSIS' Web site at [www.fsis.usda.gov/Fsis\\_Recalls/index.asp](http://www.fsis.usda.gov/Fsis_Recalls/index.asp) or call the Recall Management Division at (202) 690-6388.

### Compliance Guidance Issued for Small Plants

*By Karlease Kelly*

**F**SIS has issued compliance guidance on a range of regulatory issues for small and very small plants through various resource documents. These guidance documents do not set regulatory requirements. However, they provide information to plant owners and operators on how they can meet regulatory requirements to ensure food safety.

One of the most recently issued documents is the *Compliance Guideline for Controlling Salmonella in Poultry*. This resource describes concerns and validated controls for each step in the broiler slaughter process. It targets small and very small poultry plants to help them better comply with regulatory requirements.

Another recently issued resource is the *Compliance Guideline for Small and Very Small Plants Appealing Inspection Decisions*. In this document, FSIS provides information to help plant owners and managers understand the appeals process and, in turn, learn how to make an appeal regarding an inspection decision.

For a complete listing of these compliance guidelines, visit [www.fsis.usda.gov/Regulations\\_&\\_Policies/Compliance\\_Guides\\_Index/index.asp](http://www.fsis.usda.gov/Regulations_&_Policies/Compliance_Guides_Index/index.asp). Also, for upcoming net meetings where subject matter experts review the compliance guidance and answer questions on line or by phone, visit [www.fsis.usda.gov/News\\_&\\_Events/Regulatory\\_Web\\_Seminars/index.asp](http://www.fsis.usda.gov/News_&_Events/Regulatory_Web_Seminars/index.asp). For assistance in obtaining any of this information, call (202) 690-6520.

# Handling Food Animals With Care

By Maxine Hillary and Carol Romeo

While preventing intentional and unintentional contamination of the meat, poultry and processed egg products supply remains FSIS' primary mission, the agency is also committed to ensuring the humane handling and slaughter of food animals. There are different schools of thought on the welfare of animals that are raised and slaughtered for food, but Federal regulators, members of the meat and poultry industry, consumers and animal welfare groups agree on the importance of the issue and pursuant to Federal law, FSIS routinely takes steps to ensure that its workforce, as well as industry, is ensuring humane handling and slaughter.

Agency veterinarians enforce humane handling and slaughter regulations pursuant to the Humane Methods of Slaughter Act. The oversight begins at the moment a live animal reaches your facility. FSIS veterinarians and slaughter line inspectors observe the methods by which livestock are slaughtered, and they are obligated to take appropriate enforcement actions.

FSIS Veterinarian Thomas McDougal who works out of the Dallas Field Office comments on the part of his job that requires him to enforce the Humane Slaughter Act. "Ensuring that livestock are handled and slaughtered in a humane manner is a vital and very satisfying role that I carry out as an FSIS Public Health Veterinarian. We have been given the legal mandate and the necessary authority to enforce the humane handling and slaughter of livestock and it is something that I take very seriously, and I think it is one that the consuming public takes very seriously as well."

His perspective is echoed by Janet Riley, senior vice president for public affairs at the American Meat Institute in Washington, DC. Riley considers that the best practices come from within and regardless of motive, result in a better product. "Ensuring optimal welfare is good for livestock—and good for business. Good handling reduces livestock stress and increases meat quality," says Riley.

For some producers, humane handling not only satisfies a legal statute and guarantees brand loyalty from the consumer—it's the right thing to do. Tedd Heilmann, general manager of Organic Valley, a cooperative of organic farmers based in LaFarge, WI, considers it a moral issue. The people who buy his product insist that the animal be treated humanely at all points of processing.

"We believe deeply in humane animal treatment. We want to ensure these animals' well-being up to the point of the most humane slaughter possible and work with our processors to make sure that the holding areas and the holding pens that the animals are in prior to the slaughter meet our standards. All of our farmers have a strong sense of compassion and conviction about humane animal treatment," says Heilmann.



Humane slaughter practices are effective in the processing of most food animals, even those that are not covered by the Humane Methods of Slaughter Act. Although there is no specific Federal humane handling and slaughter statute for poultry, poultry regulations under the Poultry Products Inspection Act require that live poultry must be handled in a manner that is consistent with good commercial practices, which means they must be treated humanely. Recommendations are described in a September 2005 FSIS Notice – *Treatment of Live Poultry Before Slaughter*, which is accessible at [www.fsis.usda.gov/OPPDE/rdad/FRPubs/04-037N.htm](http://www.fsis.usda.gov/OPPDE/rdad/FRPubs/04-037N.htm). The Notice is based on information provided in the National Chicken Council (NCC) Animal Welfare Guidelines.

FSIS recommends that you periodically review the following steps to ensure humane handling of all food animals. First, you should assess your current systems for any handling problems. Next, take steps to minimize these problems. Finally, periodically evaluate whether your systems are working.

FSIS is committed to working with you and other stakeholders to improve the treatment of livestock and poultry. Although the agency does not have authority under the law to regulate how animals are raised on farms—before they reach a slaughter facility—you are encouraged to develop and use sound standards for the care, handling, transportation, and slaughter of livestock.

FSIS believes that industry and others who have an interest in animal welfare and safe food production should continue to work proactively to ensure humane handling of animals and to produce even safer food. In the next month's issue of *Small Plant News*, we'll cover the various organizations you can turn to for more information on humane handling.