

Small Plant NEWS

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Small Plant NEWS

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Choosing Your Suppliers: Some Helpful Tips From Small Plant Owners

By Larae Booker

The U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) wants you to have the information you need to comply with regulatory requirements and to produce the safest possible food.

To help the Agency do this, from time to time *Small Plant News* will bring you tips from small and very small plant owners—just like you—on topics that matter most to your operation.

For this issue, *Small Plant News* reached out to Hugh Tyler, owner and operator of the Columbia, South Carolina-based, The Butcher Shop, with over 40 years in the meat industry, and to Mark Schad, who in his position with Smart Food Safety, Inc., a consulting company, uses knowledge from 30-plus years in the meat industry, primarily as owner of a small processing operation based in Cincinnati, Ohio, to advise small and very small plant owners.

Tyler and Schad weighed in on an area they both found of critical importance to you: choosing your suppliers. The following are four major tips that came out of *Small Plant News*' conversations with these experienced—and successful—meat industry professionals.



Inside a sheep processing plant. (USDA image)

Tip 1: Relationships are key.

Both Schad and Tyler suggest buying only from suppliers with whom you can have a relationship.

Schad, whose processing operation made only one product, was able to form a solid relationship with a single supplier. He recognized that other operations that produce multiple products may need several suppliers, but the idea is the same: "Nail it down to one supplier and form a relationship with him or her, or narrow it down to as few suppliers as possible."

While Tyler suggested a slightly different approach of using two to three suppliers to spur competition for pricing, he also stressed the importance of relationships. And

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How the 2008 Farm Bill Affects State and Federal Meat and Poultry Plants

By Elizabeth Boody

The Food, Conservation, and Energy Act of 2008 (also known as the Farm Bill), which was enacted on June 18, 2008, provides a new program option for certain State-inspected establishments, as well as new regulatory requirements for federally inspected establishments.

The new law supplements the existing Federal-State cooperative inspection program with a new provision whereby existing State-inspected plants with 25 or fewer employees can apply to join a new program. Under the direction of USDA, State employees would administer Federal regulations and label all products with a Federal mark of inspection. Thus, these USDA-selected small and very small State-inspected establishments would be eligible to ship interstate.

When the interstate program goes into effect, the U.S. Department of Agriculture will reimburse the respective States for “not less than 60 percent” of the inspection costs at those selected establishments. Under the current cooperative agreement, the reimbursement is up to 50 percent. The Farm Bill also provides “transition grants” for States to help establishments develop food safety plans in order to transition to this new hybrid program.

On September 16, 2009, FSIS published the proposed rule for interstate shipping. Two public teleconference meetings were held on October 27 and November 5.

State meat and poultry inspection programs that choose not to participate will continue to operate under the current cooperative agreement, which requires that State meat and poultry inspection programs impose mandatory inspection and sanitation requirements “at least equal to” those in the Federal Meat Inspection Act and the Poultry Products Inspection Act. However, under that program, State-inspected meat and poultry products produced are prohibited from being shipped across State lines.

Another provision in the Farm Bill having an impact on small plants is a requirement that all FSIS-inspected meat and poultry establishments do the following: (1) prepare and maintain recall plans for all meat or poultry products produced and shipped by the establishment; (2) document each reassessment of the process control plans of the establishment; and (3) “promptly notify USDA FSIS with regard to the type, amount, origin, and destination of the [meat] or poultry product” if they have “reason to believe, that an adulterated or misbranded [meat or poultry] product received by or originating from the establishment has entered into commerce.”

If you have further questions or need more information on the progress of the Farm Bill implementation, contact FSIS’ Congressional and Public Affairs Office at (202) 720-9113.

Adopt a Food Defense Plan Voluntarily

By Marianne Elbertson

F SIS is offering a new, simple and easy-to-use planning tool to small and very small plants that need food defense plans. The agency hopes to avoid rulemaking that will mandate food defense plans by encouraging all plants to adopt them voluntarily.

If at least 90 percent of the regulated industry maintains functional plans, as evidenced by surveys of FSIS inspection personnel, FSIS will deem rulemaking unnecessary. In December 2009, FSIS will repeat its Food Defense Plan Survey to determine how many FSIS-regulated slaughter and processing plants have voluntarily adopted a functional food defense plan. Results from the third survey, conducted in August 2008, indicated that fewer than 50 percent of these plants had adopted plans.

To assist small and very small plants with voluntarily adopting a plan, FSIS has developed a new general food defense plan. It was mailed in October 2009 to establishments that did not have a food defense plan documented during the 2008 survey. By reviewing the document and signing the cover page, plants can answer “Yes” when FSIS inspectors ask whether they have a plan as part of the latest survey.

The plan documents procedures that an establishment likely already has in place. In addition, the plan will provide guidance on how to maintain a functional plan through periodic reviews and annual testing.

It is important to have a functional food defense plan for several reasons. Adopting and implementing a food defense plan can increase your preparedness and ability to respond to an emergency in a way that is consistent with current best



Food defense measures to protect from people who intend to do harm

- Know the background (e.g., criminal history, legal records) of all of your employees.
- Identify employees, visitors, and contractors (e.g., construction workers, cleaning crews, and truck drivers) to some extent (e.g., colored ID tag or smocks) at all times while on the premises.
- Control entry of employees and contractors into the plant during working and non-working hours (e.g., coded locks on doors, receipt on duty key cards, etc.).

Step 2 – Develop a Food Defense Plan

Now that you have checked the measures that your facility has in place, take a look at the measures that you were not able to check. Are there practical improvements you could do to make your building and food products more secure? If so, you may want to make these improvements. Keep in mind that not all measures are necessary for all slaughter and processing facilities. For example, let's imagine you are not able to check "Visitors/guests are asked to sign in and provide identification." Perhaps you don't need this measure because you currently do not allow visitors and guests beyond a front desk and they are not allowed in any other area of the building. Not checking a box does not necessarily mean there is a serious problem with security at your facility. However, it should cause you to think about whether certain food defense measures are needed.

Once you have identified both the food defense measures you have in place and those that you need to add, write them down. This will become your food defense plan. An easy way to develop your food defense plan can be found on the FSIS Web site (www.fsis.usda.gov/Food_Defense_&_Emergency_Response/Security_Guidelines/index.asp). You will find a helpful resource guide called "Developing a Food Defense Plan for Meat and Poultry Slaughter and Processing Plants." You may also order a copy of the guide by calling (301) 344-4757 (8:00 a.m. – 4:00 p.m. Eastern Time). This resource guide offers more detailed information about food defense measures.

Step 3 – Implement Your Food Defense Plan

Now that you have developed a food defense plan, use it. Remember to review your plan regularly to make necessary changes or improvements.

For questions you may have on developing your food defense plan you may:

Call FSIS toll-free at 1-800-233-3935 OR
AskFSIS at <http://www.fsis.usda.gov> and from the "I want to..." list, click on "ask FSIS an Inspection-Related Question."

Additionally you may contact an industry trade association such as:

- American Meat Institute at <http://www.meatinst.com>
- National Meat Association at <http://nmaonline.org>
- American Association of Meat Processors at <http://www.aamp.com>
- National Turkey Federation at <http://www.naturkey.com>
- National Chicken Council at <http://nationalchickencouncil.com>

What do I do if there is an emergency or I think that a food product has been tampered with?
In an emergency, your first step should always be to contact local law enforcement—dial 911. Then contact one of the following:

FSIS 24 hour emergency number (866) 395-9701 for meat, poultry or egg products
FDA 24 hour emergency number (301) 443-1240 for food products not listed above

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Guide to Food Defense in Slaughter and Processing Facilities

Protect your customers, your employees, and your business.

United States Department of Agriculture
Food Safety and Inspection Service 

practices. This, in turn, will help protect your customers, employees, brand name, and company reputation, and may reduce your exposure to liability. The first page of the FSIS general food defense plan has more about the importance of food defense plans.

In addition to the mailing, it is available on the FSIS Web site at www.fsis.usda.gov/Science/Small_Very_Small_Plant_Outreach/index.asp.

If you have policy-related questions about the new plan, contact the FSIS Policy Development Division through “askFSIS” at <http://askfsis.custhelp.com> (any time) or call (800) 233-3935 (6:00 a.m. – 5:00 p.m. CT, Monday through Friday, except on Federal holidays).

Food Safety Resources

By Sally Fernandez

Looking for a resource to assist you in preventing *Listeria monocytogenes* (*Lm*) contamination in your plant? The DVD and companion booklet, “Control of *Listeria monocytogenes* in Small Meat and Poultry Establishments” may be just what you need.

This pair of resources is designed to provide guidelines for small processors on methods and practices for assessing and controlling opportunities for contamination of ready-to-eat (RTE) products by *Lm*. Sanitation steps and testing regimes are clearly demonstrated and explained in the DVD. The booklet describes primary sources and potential reservoirs of contamination. It provides considerations for control methods and suggests design improvements for optimal contamination prevention. In addition, the booklet covers environmental, food-contact surface, and product testing. The appendix

contains a checklist of questions designed to help you perform a risk assessment of *Listeria* contamination in your plant.

Readers who are interested in this topic may also be interested in the following resources: “*Listeria* Guidelines for Industry,” “FSIS *Listeria monocytogenes* Workshop,” and “Implementation of a Post-Packaging Heat Treatment to Reduce *Listeria monocytogenes* on Ready-to-Eat Meat Products for Very Small and Small Establishments.”

To order these free materials, fax the order form found in the Food Safety Resources brochure to (202) 690-6519, or complete an online version of the form and send it to FoodSafetyResources@fsis.usda.gov. The online form can be found at www.fsis.usda.gov/Science/HACCP_Resources_Order_Form/index.asp. For further assistance, call (800) 336-3747.

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because reputations are invaluable to small and very small processors, you should buy from those suppliers who work hard to protect their own reputation. His advice is to work with suppliers who have too much to lose if they don't.

Tip 2: *When it comes to the quality and safety of the food you produce, the better the materials you have coming in the door, the better product you'll have going out.*

Or as Schad explained, "Aim for minimal defects when you receive the product." Defects can include not only the presence of bone, blood, and excess fat associated with food quality, but pathogens as well. Catching defects at the door by choosing quality suppliers saves your operation the time and expense of removing them.

Tyler agreed. "Look for suppliers who are careful about what they themselves buy." Beware of "salvage dealers" who don't use quality ingredients in their products.

Tip 3: *Upfront costs for better suppliers are worth the price.*

A simple concept, but a hard sell: you get what you pay for. If you're forging a relationship with quality

suppliers and aiming for minimal defects, it may come at a slightly higher price. Schad advises, "Don't always buy cheaper. Paying more up front can be better in the end."

But, as Tyler added, "losing customers is a much greater cost than, say, 3 cents on the pound for a good supplier with quality product."

Tip 4: *Flex your muscles as a buyer.*

Work with suppliers who understand that your operation is under Federal inspection and who will help you stay in compliance. For example, you can inform suppliers up front that if the product doesn't meet your critical limits—like temperature—when you receive it, you won't accept it. Tyler's establishment uses this practice.

Be confident that you have some buying power, especially if you're building relationships with good suppliers. Be critical about what comes in the door and even consider paying a little more for it.

Your suppliers have an impact on the quality and safety of the products that come out under your establishment's name. Choose them wisely.

If you have a tip you'd like to share with other owners of small and very small plants, contact *Small Plant News* at (800) 336-3747 or email SmallPlantNews@fsis.usda.gov.

Commonly Asked Questions & Answers

Q *Am I required to document Sanitation Standard Operating Procedure (SSOP) and Hazard Analysis and Critical Control Point (HACCP) corrective actions on the Noncompliance Record (NR), or do I have to write them on my company record?*

A. The requirement in 9 Code of Federal Regulations (CFR) 416.16 and 417.3(c) is that you document SSOP and HACCP corrective actions. The establishment can document these corrective actions in its records or on the NR. If the documentation is on the NR, the NR becomes part of your HACCP or SSOP records and must meet the recordkeeping requirements of those regulations.

Q *If I conduct retail exempt operations in a federally inspected establishment, am I*

required to keep these operations separate from federally inspected operations?

A. Yes. 9 CFR 305.2 requires the official establishment to be separate from the unofficial establishment so that FSIS is able to distinguish between the two operations and the product from those operations. Operational and product separation has typically been determined by time or space. In other words, the retail exempt operations would have to be conducted in an area that is completely separate from the area in which inspected activities are being performed and where there is no possibility of cross-contamination between the two areas. Alternatively, they could be conducted in the same facilities, but they would have to be conducted at a time when no inspected activities are occurring. The criteria for exemption from inspection for retail operations are addressed in 9 CFR 303.1(d).