

Small Plant NEWS

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Utilizing Cooperatives To Improve Food Safety:

A Success Story of Small Farmers, Processors, and Retailers Working Together

By Linda Singletary



A small sheep farm. (USDA photo)

Since the U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) created the Office of Outreach, Employee Education, and Training (OOEET) in 2008, the Office has been serving the needs of small and very small businesses that must comply with FSIS' food inspection laws.

In many cases around the Nation, these small businesses are members of cooperatives comprised of small farmers, ranchers, and retailers. These cooperatives meet public demand for locally produced food products and help provide for their members' mutual support in an ever-tightening economy.

OOEET has been targeting these cooperatives, and as a result, FSIS' food safety message gets disseminated to the producers and retailers as well. One example of this type of initiative involves working with the Alabama goat and sheep industry.

In December 2008, at the Lauderdale County Cooperative Extension office in Florence, Alabama, a meeting involving three integral parts of the farm-to-fork chain took place. OOEET's outreach coordinators Sibyl Wright and Lindia Howell served an instrumental function in meeting

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Building a Humane Handling System for Better Care, Quality, and Profitability

By Denise Amann



The U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) is responsible for and committed to enforcing the Humane Methods of Slaughter Act (HMSA) and ensuring that all livestock at federally inspected slaughter facilities be handled and slaughtered by humane methods. FSIS inspection personnel are required by law to take immediate action if they observe any humane handling violations on the establishment premises, including holding pens and any vehicles on the premises. If they observe an inhumane handling practice, they may issue a Noncompliance Record. Egregious violations—an act or condition that is cruel to animals—can warrant an immediate suspension of all operations without providing prior notification to the establishment.

All livestock slaughter facilities are required to meet the requirements of the HMSA. The requirements are clear; however, the way different livestock (and those who handle

livestock) react to various situations is not. A spent dairy cow is slower than its younger counterparts. An angry rank bull would rather not stand quietly in the knock box. It isn't always easy to get a cull sow up on a hot day in August.

With that, the best approach to humanely handling livestock is consistency. And the easiest way for any plant to be consistent is by approaching humane handling as a system. A humane handling system characterized by order and planning will allow you to use humane handling methods in a way that prevents needless suffering, improves the quality of your meat products, and significantly reduces your risk of a regulatory action by FSIS.

When developing a humane handling system, consider all of the factors for the entire time that livestock is held for slaughter. This would include factors that may be less predictable, like extreme weather conditions, staffing changes, and equipment wear and tear.

FSIS has provided guidance on establishing a humane handling system in a notice (FSIS Docket No. 04-013N) found at www.fsis.usda.gov/OPPDE/rdad/FRPubs/04-013N.htm. The notice outlines four components to developing and maintaining a systematic approach to humane handling.

- 1. Conduct an initial assessment of your facilities.** The initial assessment should focus on areas within your facility where animals may experience excitement, discomfort, or accidental injury.
- 2. Design facilities and implement practices that minimize excitement, discomfort, and accidental injury to livestock.** Pens, driveways, and ramps should be designed and maintained to prevent injury to animals. All staff should be trained in fundamental animal behavior principles and how to handle livestock properly in varying situations.
- 3. Periodically evaluate your system to check that it is working as required.** Evaluation should include stunning and handling activities using objective criteria. Periodic evaluation also allows you the opportunity to eliminate potential issues before they become a problem.
- 4. Improve handling practices and modify your facilities as needed.** If a problem arises, fix it. Allow your staff who are directly involved with handling animals to make suggestions about how to improve your system. Their expertise can be a valuable asset to any system.

For more information about how to improve humane handling at your plant, contact the district veterinary medical specialist in your district. Also, feel free to contact FSIS' Policy Development Division at (800) 233-3935.

NOIEs, Part 2: Knowing Which Circumstances Require Prior Notification and Which Ones Don't

By Jane Johnson

In Part One of this series on the Notice of Intended Enforcement (NOIE) actions, we examined the three types of enforcement actions defined in the Rules of Practice, Title 9 of the *Code of Federal Regulations* (CFR), Section 500. As mentioned in the first article, there are situations that involve withholding and suspension actions that require prior notification of plant management in the form of an NOIE and those that do not. Let's take a closer look now at some examples.

FSIS inspectors may take a withholding or suspension action without prior notification in the following circumstances at a plant:

- Producing and shipping adulterated or misbranded product;
- Lacking a Hazard Analysis and Critical Control Point (HACCP) plan;
- Lacking Sanitation Standard Operating Procedures (SSOP);
- Having sanitary conditions causing its products to be rendered adulterated;
- Violating the terms of a regulatory control action;
- Plant employees threatening or intimidating an FSIS employee;
- Failing to destroy condemned product; and
- Inhumane handling of animals.

The plant will be notified orally, and in writing, as promptly as circumstances permit, for withholding or suspension actions taken when no prior notification is given. If you choose to appeal, you should do so as soon as possible after being notified of the decision. It would be best to put the appeal in writing, although the appeal can be made orally.

For all other situations, FSIS must provide the plant with prior written notification and a chance to “demonstrate or achieve compliance” before taking a withholding or suspension action. Title 9 of the *Code of Federal Regulations* (CFR), Section 500 specifically states that FSIS must provide the plant with prior notification in these situations:

- HACCP system is inadequate due to multiple or recurring noncompliances;
- SSOPs have not been properly implemented or maintained;

- Plant has not maintained sanitary conditions due to multiple or recurring noncompliances;
- Plant did not collect and analyze samples for *E. coli* Biotype I and record results; or
- Plant did not meet the *Salmonella* performance standard requirements.

Prior notification provides you with due process rights. Usually, FSIS compiles extensive, thoroughly analyzed information prior to taking a withholding or suspension action.

It's only fair to notify you and make that same information available before the action is taken when circumstances do not pose an imminent threat to public health. Giving you prior notification affords your plant an opportunity to provide a response to the notification, point out any factual errors by FSIS, identify scientific or technical disagreements, and articulate differing interpretations of regulatory requirements.

The NOIE is the prior notification given to you, in writing, stating that a withholding or suspension action will be taken unless the circumstances leading to the NOIE are corrected. The inspector-in-charge may initiate a withholding or suspension action by discussing the noncompliance situation with the frontline supervisor and the district office.

If there is agreement that a withholding or suspension action is warranted, then an NOIE is issued to your plant by the district manager. The NOIE will contain specific information including the action FSIS intends to take and the effective date of the action, the reason for the proposed action, and the operations, products, or processes affected.

In the third and final part of this series, we'll look at your options and what you should do after you receive an NOIE. For more information on the Rules of Practice or NOIEs, visit the FSIS Web site at www.fsis.usda.gov. You can also call the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or e-mail Info.Source@fsis.usda.gov. The Help Desk is open from 8:00 a.m. to 4:00 p.m. ET, Monday through Friday.

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with agencies, institutions, and a producer group whose collaborations have played a role in a very successful food safety and marketing initiative in Alabama's goat and sheep products.

This meeting was the culmination of a multi-year effort by FSIS employees and other USDA representatives to bring small farmers, processors, and retailers closer together in marketing and food safety. It all started in 2007, when Wright visited Alabama to meet with a producer group called the Alabama A+ Marketing Association. This association was formed to increase farm revenues for its membership, and economically benefit local communities in ways that encourage them to support local agriculture production. It's currently targeting three commodities – goat, sheep, and rabbit.

Over the past few years, a significant amount of progress has taken place, including the development of an FSIS-inspected goat and sheep processing facility. In addition, the Northwest Alabama Resource Conservation and Development Council and the Alabama A+ Marketing Association have collaborated with a local grocery store franchise that now proudly carries Alabama grown and processed lamb products.

John Smith, a consultant for the Alabama A+ Marketing Association remarked, "In my many years of experience developing and working with numerous cooperatives, this association by far has been the most successful, and that is what makes it unique. Much of this is due to the commitment of its members."

The meeting in which Wright and Howell participated was attended by 22 people representing various agencies and organizations that currently work with the association.

This was the first time that many of the representatives met together in the same room rather than communicating by phone or email.

The purpose of the meeting was to review progress that had been made and to develop strategies for developing relationships with other producer groups across the country. Wright and Howell also shared FSIS materials with the attendees. These included notices, contacts, Web sites, information pamphlets, newsletters, and other food safety resources available to small and very small plants.

Many of the participants gained a greater appreciation of the food safety connection and relevance among all the segments of the food production chain.

"One of the things we can do in outreach is to ensure technical assistance and relevant food safety information is not only made available to processors, but also to the producers, producer groups, and retailers. This meeting is a prime example of how that can take place and when it works well," said Wright.

Through partnership ventures like this, FSIS can reach a very important audience that might not receive the Agency's information from more conventional means. Although the meeting in Alabama was successful, it's not intended to be the "end all, be all" in FSIS' outreach to this particular community. Instead, it's just one shining example of what's set in motion for more initiatives like this to come.

If you are a member of a cooperative and would like to share a success story or seek FSIS' assistance in food safety outreach, contact the Office of Outreach, Employee Education, and Training at (800) 336-3747.

Commonly Asked Questions & Answers

Q *Is a plant required to determine, and document, preventive measures when it, or FSIS, finds an unclean food contact surface during pre-operational (pre-op) sanitation monitoring?*

A. No. When an unclean food contact surface, equipment, or utensil is found during pre-op by the plant, before any product has passed over the unclean surface, the establishment needs to clean the surface, but there is no noncompliance. The plant's system worked as designed. The establishment should generate an appropriate record in accordance with 9 CFR 416.16.

If FSIS were to have found the unclean surface, the Agency would expect the plant to clean the surface and would issue a noncompliance record because of the insanitary condition. In addition, FSIS would expect the plant to consider how to make appropriate improvements in the execution of its pre-operational procedures because the establishment must be maintained in a manner sufficient to prevent the creation of insanitary conditions. Preventive measures would not need to be documented, unless the product has been adulterated or contaminated by the unclean surface, equipment, or utensil.