

Small Plant NEWS

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Reminder To Keep Species Separated

By Jane Johnson, DVM



As a small or very small plant owner/operator, you may slaughter and/or process different species of animals at your facility. If you do, it's important to remember that each species should be separated in space or time if your products are labeled or packaged in such a way that only one species is represented or is listed in the ingredients.

For example, a product labeled as "all beef hot dogs" cannot contain trace amounts of pork, and a product labeled as "ground pork" cannot contain trace amounts of beef.

So what are the requirements when an establishment that slaughters or processes more than one species

switches from one species to the other, and the labeling is intended to address only one of the species?

While the U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service's (FSIS) regulations do not explicitly require a complete cleanup before the switch, failure to conduct a cleanup sufficiently to remove all visible debris would likely result in regulatory concerns for the Agency. Three of the biggest concerns are that:

- The finished product could be considered adulterated because of the creation of an insanitary

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condition during processing due to the presence of visible debris from another species. This would be a deficiency related to Title 9 of the *Code of Federal Regulations*, Part 416 (9 CFR Part 416), Sanitation Standard Operating Procedure.

- The finished product could be considered adulterated because the incorporation of a food safety hazard that is present in one species might not be adequately addressed in the hazard analysis. The regulations affected in this case would be those associated with Hazard Analysis and Critical Control Point, 9 CFR Part 417.
- The finished product could be considered both adulterated and misbranded because of species substitution. In this case, labeling regulations would be impacted.
 - For meat, 9 CFR 317.8, False or misleading labeling or practices generally; specific prohibitions and requirements for labels and containers.
 - For poultry, 9 CFR 381.129, False or misleading labeling or containers.

Agency's laboratories. If the product is in a natural casing, the inspector is to collect a sample of the emulsion. The



inspector will then attach the product's label, showing the ingredient statement, and ship the sample to the lab.

The laboratory will test the product and report species results that correlate with the ingredient statement as "Acceptable." Likewise, if the laboratory finds that a species not declared on the ingredient statement is present in the sample, or one of the species on the ingredient statement is not present in the sample, the result will be reported as "Not Acceptable," and the inspector will take the appropriate action based on the regulations. This may include issuing a non-compliance record (NR), retaining product, rejecting equipment or facilities, stopping lines, or refusing to allow the processing of specifically identified product (9 CFR 500.1(a)). Additionally, FSIS may rescind or refuse approval of false or misleading marks, labels, or sizes or forms of any container for use with any meat or poultry product per 9 CFR 500.8.

For more information or answers to questions regarding species identification and labeling, contact the Small Plant Help Desk at 1-877-374-7435 or InfoSource@fsis.usda.gov.



FSIS inspectors perform species identification tests when there is a concern that a product may contain a species not declared on the label. When the inspector collects samples for species testing, he or she will notify you that the sample is to be collected.

The inspector will then collect at least 2 pounds of product and put it in a plastic bag supplied by one of the

Part II: Rural Development Stands Ready To Assist Small Meat and Poultry Plants With Grant Programs

By Andy Jermolowicz and Janet McGinn

In the previous issue of *Small Plant News*, the first part of this two-part series covered the various loan programs that USDA's Rural Development offers to small and very small meat and poultry plants. In this article, we'll take a look at the different types of grants for which you might be eligible to apply.

Rural Development administers several grant programs that can provide revolving loan funds and the development of physical infrastructure and facilities, support training, and technical assistance for business development and provide access to planning and working capital funds for viable value-added agricultural businesses. A brief overview of these programs follows.

- Rural Business Enterprise Grant (RBEG) program – Provides grants for rural projects that finance and facilitate the development of small and emerging rural businesses to help fund business incubators and help fund employment-related adult education programs. To assist with business development, RBEGs may fund a broad array of activities.
- Rural Economic Development Loan and Grant (REDLG) program – Provides funding to rural projects through local utility organizations. Under the REDLoan program, USDA provides zero-interest loans to local utilities which they, in turn, pass through to local businesses (ultimate recipients) for projects that will create and retain employment in rural areas. The ultimate recipients repay the lending utility directly. The utility is responsible for repayment to the Agency. Under the REDGrant program, USDA provides grant funds to local utility organizations that use the funding to establish revolving loan funds. Loans are made from the revolving loan fund to projects that will create or retain rural jobs. When the revolving loan fund is terminated, the grant is repaid to the agency.
- Intermediary Relending Program (IRP) – Provides grants designed to alleviate poverty and increase economic activity and employment in rural communities. Under the IRP, loans are provided to local organizations (intermediaries) for the establishment of revolving loan funds. These revolving loan funds are used to assist with financing business and economic development activities to create or retain jobs in disadvantaged and remote communities. Intermediaries are encouraged to work in concert with State and regional strategies and in partnership with other public and private organizations that can provide complementary resources.
- Rural Microentrepreneur Assistance Program – Provides direct loans, technical assistance grants, and technical assistance-only grants to microenterprise development organizations to support the development and ongoing success of rural microentrepreneurs and microenterprises in rural areas.
- Value-Added Producer Grant program – Provides grant funds to independent producers, farmer and rancher cooperatives, agricultural producer groups, and majority-controlled producer-based business ventures. The funds are used for planning activities and for working capital for marketing value-added agricultural products.
- Rural Energy for America Program (REAP) – Provides guaranteed loan and grant funds that can be used to promote energy independence and enhance economic development in rural economies.
 - The REAP Guaranteed Loan Program encourages the commercial financing of renewable energy systems (bioenergy, geothermal, hydrogen, solar, wind, and hydropower) and energy efficiency improvement projects. Under the program, borrowers will work with local lenders, who, in turn, can apply to USDA Rural Development for a loan guarantee of up to 85 percent of the loan amount.
 - The REAP/Renewable Energy Systems/Energy Efficiency Improvement grants program provides grants to purchase and install renewable energy systems (bioenergy, geothermal, hydrogen, solar, wind, and hydropower) and energy efficiency improvement projects. It also provides grants to agricultural producers and rural small businesses to conduct a renewable energy feasibility study.
 - The REAP/Energy Audit/Renewable Energy Development Assistance grant program provides grants for energy audits and renewable energy development assistance.

Depending on the nature of your project or your needs, all of the programs discussed here could be used by small-scale meat and poultry processors to develop and expand your operations. For further information on all programs available through Rural Development, please contact your State Rural Development office or visit the USDA Rural Development Web site at www.rurdev.usda.gov. You can also call USDA Rural Development at (202) 690-4730.

Commonly Asked Questions & Answers

Q. *Should the frequency for the direct observation verification of monitoring activities be listed in the HACCP plan?*

A. Yes. Title 9 of the *Code of Federal Regulations* (CFR), Part 417.2 (c) (7) requires the HACCP plan to list the verification procedures and the frequency with which those procedures are performed. Direct observation of the monitoring activities is one of the verification procedures listed in 9 CFR 417.4(a)(2).

Q. *Are inspectors required to collect and record animal identification when a sample is collected for residue testing?*

A. Yes. According to 9 CFR 310.2 (a), all animal identification is to be retained with the animal until the post-mortem examination is completed. When a residue sample is collected in an official slaughter establishment, FSIS inspection program personnel are to collect and document all identification from animals selected for residue sampling. Types of animal identification include, but are not limited to, livestock-market or sale-barn back tags, producer ear tags, feedlot identification tags, Canadian tags, vaccination tags, calf-hood (bang) tags, tattoos, and brands. In addition, FSIS inspection program personnel are to request information on the producer/owner name and address of the animal selected for sampling from the establishment.

The identification information is to be maintained identifiable with the carcass until the screen test is performed. All identification information is to be recorded in blocks 26 and 27 of FSIS Form 10,210-3 for all directed residue samples, and blocks 23 and 24 of FSIS Form 10,000-2 for all inspector-generated residue samples submitted to FSIS laboratories on positive residue screen tests (KIS™ or FAST test).

Q. *How do FSIS inspectors verify that casings processed outside the United States were derived from animals that received ante-mortem and post-mortem veterinary inspection at the time of slaughter?*

A. FSIS inspection program personnel verify that casings were derived from animals that received ante-mortem and post-mortem inspection under USDA supervision when the certificate signed by a government official of the exporting country either contains a statement as outlined in FSIS Directive 9000.2, Section IX, D. 1., or is accompanied by a copy of and references in the remarks, the corresponding FSIS Form 9060.7 (08/13/2008), "Animal Casings Export Certificate for Countries Requiring Ante-Mortem, Post-Mortem, and Fit for Human Food Statements" that was issued for export to that country. FSIS inspection program personnel may then proceed as directed by FSIS Directive 9000.2, Revision 1, Inspection and Certification of Livestock Intestines or Casings, to certify the casings for export.