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Network Offers Assistance to Niche Meat Processors

By Keith Payne

A relatively new group offers assistance, resources, and guidance to small and very small plants slaughtering and processing meats derived from livestock and poultry that are locally grown, certified organic, grass-fed, antibiotic and hormone free, or humanely raised (certified). Supported by funding from the U.S. Department of Agriculture's (USDA) Rural Development program; USDA's Cooperative State Research, Education, and Extension Service; the W.K. Kellogg Foundation; and Heifer International; the Niche Meat Processor Assistance Network (NMPAN) is a national network of people and organizations assisting niche meat processors as well as the livestock producers and niche meat buyers who depend on them.

"We started this group in the fall of 2007 as a way to connect folks around the country who are trying to help small meat processors expand or upgrade in order to provide greater marketing opportunities for smaller farmers and ranchers," said Arion Thiboumery, co-founder and co-coordinator of the network and Project Manager at the North Central Regional Center for Rural Development in Ames, Iowa.

"Often small plants lack the capacity, equipment, appropriate inspection status, and the human and financial capital needed to upgrade or



NICHE MEAT PROCESSOR ASSISTANCE NETWORK

Logo courtesy of NMPAN

expand. Communities, businesses and other groups around the country are working on this problem, but the right combination of guidance and resources can be hard to find. By linking people and resources together nationally, we hope to help bridge that gap," said Dr. Lauren Gwin, co-founder and co-coordinator of NMPAN and a research associate at Oregon State University.

Simply stated, NMPAN's goal is to strengthen and expand the slaughter and processing capacity of the meat processing sector serving niche markets. The network aims to do this in two ways. The first is by bringing various assistance providers together who work with niche processors to share resources and ideas, as well as work together on issues of national importance. The second is by connecting processors, producers, buyers, and other interested parties to the assistance providers in their State or surrounding States to improve strategic outreach and action locally and regionally.

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Preparing Your Plant for a Food Safety Assessment: Some Useful Tips To Ensure a Smooth Process

By Linda Singletary

You've been notified that your plant is scheduled for a comprehensive food safety assessment (FSA). Now what?

A comprehensive food safety assessment covers all aspects of your food safety system. It considers the source of all the materials that you receive and your plant's processes and environment. The assessment covers the design of the Hazard Analysis and Critical Control Point (HACCP) plan and supporting documents, your Sanitary Standard Operating Procedures (SSOPs), any other prerequisite programs that you employ, the microbiological testing procedures you employ, how you attempt to comply with the sanitation performance standards, and any other documentation or information that relates to your products and processes.

A food safety assessment is not part of the daily inspection conducted by FSIS inspectors assigned to the plant. Inspectors verify compliance with the regulations, including verifying that you execute your HACCP plans and SSOPs as you designed them.

Food safety assessments are conducted by FSIS' Enforcement Investigations and Analysis Officers (EIAOs). If you see an EIAO come to your plant to conduct a food safety assessment, there could be a variety of reasons for why he or she is there.

One reason could be that your establishment had a positive laboratory finding in sampling that the Agency did of your product. An EIAO would also conduct an FSA in response to a foodborne illness or outbreak associated with your product, if you conducted a recall, if FSIS is aware of consumer complaints about the safety of product that have been linked to your plant, or you have had a history of repetitive noncompliance. It is also possible that your plant may be randomly selected by district office officials for an FSA. Regardless of the reason, when a comprehensive food safety assessment takes place, all the food safety systems in operation at your plant will be assessed.

So what can you do to prepare for a food safety assessment if your plant has been selected? There are a number of things you can do to get ready.

First, you should be familiar with the *Code of Federal Regulations* (CFR), especially 9 CFR Part 416 – Sanitation, and Part 417 – HACCP. These regulations are the starting point of any FSA.

You may order resources from FSIS' Small and Very Small Plant Web address, free of charge, to help you improve your food safety system. Before an FSA, you may want to check the list of resources and order a workbook, video, or guide that could give tips on how to improve your program.

“Be proactive when it comes to staying on top of the regulations. Some ways to do that are to be aware of the conditions of your building and equipment and to recognize

how the conditions may affect the sanitation of your facility,” said Pam Ogasawara, a program manager in FSIS' Office of Field Operations.

“It's important to ensure that your HACCP plan still applies to your plant and the products that you produce. Keeping accurate records is important. All parts of your HACCP plan, such as frequencies for testing, monitoring, verification, etc., should be supported by up-to-date documentation,” added Ogasawara.

Other steps that you can take include making sure that your employees are trained, reviewing plant testing results and responding to them, looking for trends in your testing results or in your own monitoring of your operations, and conducting a reassessment if you find anything that is disturbing. You should also ensure that all of your documentation is up-to-date and accurate, that all equipment is clean, and that the systems that you employ are functioning properly.

Another option you might want to consider is to contact the FSIS District Office and request that an EIAO come to your plant and conduct a proactive visit. During this type of visit, the EIAO will explain in more detail how a food safety assessment is conducted. He or she will not actually conduct the assessment but will explain how it's done. This can help you be better prepared for the day when it comes.

How will the assessment be used if there is one? When an EIAO conducts an FSA, he or she reviews the information gathered about the plant's food safety system. Based on the review, the EIAO prepares a final FSA report. The EIAO may decide that insanitary conditions exist because the food safety system does not include either effective controls or an effective prerequisite program. The EIAO then recommends to the District Office that a Notice of Intended Enforcement (NOIE) be issued when he or she determines and can support findings from the FSA that the establishment is operating under insanitary conditions. An EIAO explains and provides documentation in the NOIE of the ways the HACCP plan is inadequate; if the Sanitation SOPs are not being properly implemented; or how the establishment is not maintaining sanitary conditions.

If you've had an assessment conducted at your establishment and you do not agree with the findings, it's important that you know your rights under the FSIS Rules of Practice. An appeal process is available, and this information is contained in 9 CFR 306.5 – Appeals, 9 CFR 381.35 – Appeal Inspections, and 9 CFR 500 Rules of Practice. More information about this topic and other topics can be found on FSIS' Web site at www.fsis.usda.gov.

To get more information on food safety assessments or to request resources that will help you prepare for them, contact the FSIS Office of Outreach, Education and Employee Training at (800) 336-3747.

Prevent Noncompliance at Your Plant

By Mary Gioglio

Take a moment to look around your establishment. People are working, the equipment is running, and the normal buzz of sound is all around. Now, just think if it all comes to a halt because of noncompliance with the Federal regulations. That's something no business wants to confront.

A noncompliance record can be avoided by taking some actions ahead of time to prevent a noncompliance situation from occurring. So, where do you begin?

First, it's important to know the regulations, and FSIS makes these available on its Web site. Second, it's important to make sure your plant is in compliance with those regulations.

The meat and poultry inspection regulations 9 CFR Part 300 - 599 cover everything from the Agency mission and organization to egg products inspection. Take a section at a time and evaluate the regulation's impact on your plant.

For example, Part 416 covers sanitation, and Section 416.2 specifically covers establishment grounds and facilities. Your establishment's grounds must be maintained to prevent conditions that could lead to unsanitary conditions, adulteration of product, or interference of inspection by FSIS personnel.

Your plant must have in place a pest management program to prevent the harborage and breeding of pests on the grounds and within establishment facilities. Pest control substances used must be safe and effective under the conditions of use and not be applied or stored in a manner that will result in the adulteration of product.

Take some time to assess conditions outside and around the perimeter of the building to determine if repairs need to be made, such as to doorways and windows that don't close properly. Then focus on the interior conditions of

the establishment. By taking this approach you will get a snapshot of the conditions that exist and determine the corrective actions that need to be taken.

Another example is Part 417, which covers the HACCP systems. Section 417.2 addresses hazard analysis and the HACCP plan. Take the time to review the requirements of conducting a hazard analysis to determine the food safety hazards reasonably likely to occur in the production process and identify the preventive measures the establishment can apply to control those hazards. Then review the requirements of developing a HACCP plan. The plan should include products produced, the hazards that can occur, the critical control point limits, and the corrective actions that will be taken if a hazard is reasonably likely to occur. To ensure that HACCP plans are implemented effectively, part 417 requires that plants conduct validation (see HACCP principle 7 in the August issue of *Small Plant News*). HACCP plans should be reviewed periodically to ensure that they are up-to-date and include all the necessary parts as outlined in the regulation.

By taking a proactive approach of reviewing the regulations, you can determine whether your establishment is in compliance with the regulations or if corrective action is needed to avoid noncompliance. If you are uncertain about a particular topic, ask the FSIS official assigned to your plant. FSIS provides guidance materials and answers to compliance questions on its Web site at www.fsis.usda.gov. On this site is *askFSIS* (see related article in the November 2007 issue of *Small Plant News*), a Web-based feature designed to help answer technical and policy-related questions. You can also contact the Policy Development Division at (800) 233-3935 or (402) 344-5000.

Food Safety Resources

By Sally Fernandez

Are you searching for information about HACCP, HACCP-related topics, or food defense? FSIS offers a wealth of free food safety materials through the agency's Food Safety Resource Brochure. The Office of Outreach, Education, and Employee Training has added new listings and reformatted several videos into DVDs. Both "Hazard Analysis and Critical Control Point System" and "Control of *Listeria monocytogenes* in Small Meat and Poultry Establishments" are now available on DVD. New publications include:

- "Guide to Food Defense in Slaughter and Processing Facilities" (Brochure);
- "Humane Handling of Livestock and Poultry" (Guidebook and DVD); and



- "Compliance Guidelines for Controlling *Salmonella* and *Camphylobacter* in Poultry, 2nd Edition" (Document).

Ordering your free copies is easy. The order form can be found at www.fsis.usda.gov/Science/HACCP_Resources_Order_Form/index.asp. For further assistance call (800) 336-3747.

Commonly Asked Questions & Answers

Q. *If I find a noncompliance and take appropriate corrective actions, would the inspection program personnel also complete a noncompliance record (NR)?*

A. In most cases, if the establishment finds noncompliance and brings itself into compliance with the regulatory requirements, inspection program personnel will not issue an NR.

Q. *How much time can pass before an NR should not be linked to another NR?*

A. Inspection program personnel should consider several factors in deciding whether to link NRs including whether:

- the noncompliance is from the same cause;
- a trend is developing;
- the establishment's further planned actions were not implemented;
- the establishment's further planned actions were

not effective in reducing the frequency of the noncompliances (if there was a substantial period of compliance since previous NR); and

- the establishment finds it necessary to continue to evaluate and implement measures to address recurring noncompliances on an ongoing basis.

If any of these factors apply to the situation, NRs can be linked without regard to time limitations.

Q. *Do I have to respond in writing to an NR?*

A. The establishment is not required to respond in writing to an NR. However, doing so may assist the establishment by creating a written record. When inspectors document noncompliance, the establishment must comply with regulatory requirements by correcting the noncompliance or contesting the validity of the finding of noncompliance on the NR. In some situations, this will include documenting the corrective actions in the establishment Sanitation SOP or HACCP records.

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How will NMPAN function? Teleconferences are just one of the ways NMPAN is accomplishing its communication goals. The network will soon kick off a series of topic-specific conference calls to provide forums for answering questions, sharing ideas, and discussing current industry issues.

However, the network operates primarily over the Internet at www.nichemeatprocessing.org and through eXtension, which is an online-based collaborative environment where Land Grant University content providers exchange information to solve challenges in real time. "We currently list State Affiliates in university extension or State departments of agriculture offering hands-on assistance in about half of the 50 states," said Thiboumery. "We're steadily growing the contacts, resources, and information we bring together." Also available on the Web site is the opportunity for small plant owners and operators to ask experts in the field specific questions and to examine case studies of niche meat processors around the country.

The case studies are just one element of an extensive online resource database that serves small plants' needs. The

case studies detail business plans, plant designs, operating budgets and costs, labor management practices, and regulatory compliance including the development of Hazard Analysis and Critical Control Points (HACCP) plans and Sanitary Standard Operating Procedures. Much of the online resource database includes short summaries with links to the best and most user-friendly information available on the Web.

"There's a lot of information out there and, as we all know, some resources are more helpful than others," said Thiboumery. "We're really shooting to be simple and user-friendly. Most resources have contact information, so that you can follow up with a person if you have questions." Information resources focus on the following areas: business planning and development, understanding and complying with regulations; and improving workforce management.

The Niche Meat Processor Assistance Network is another extraordinary resource to help you, especially if you're processing meats that are derived from animals raised locally in your area and/or are certified organic, grass-fed, antibiotic- and hormone-free, or certified humanely raised. For more information go to www.nichemeatprocessing.org or contact NMPAN co-coordinators Arion Thiboumery at (515) 294-2882; email arion@iastate.edu or Dr. Lauren Gwin at (510) 388-4720; email lauren.gwin@oregonstate.edu.