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Inside

Small Plant NEWS

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Want To Tap Into the Growing Farmers Market Sector?

By Janet McGinn

Are you a small or very small plant meat and poultry operator who would just love to tap into the growing demand for local products available at farmers markets? Did you know that in 2011, the number of operational farmers markets grew from 6,132 to 7,175, an increase of 17 percent?

Farmers markets are a vital part of the urban/farm linkage and have continued to rise in popularity. This article highlights some of the resources available to assist you in selling your products at farmers markets.

Your first step might be to see if there is there is a farmers market in your area. You can find out by searching the USDA National Farmers Market Directory at *www.farmersmarkets.usda.gov*. Farmers markets can be searched by State, county, city, Zip Code, and participation in Federal nutrition assistance programs. While you might think that farmers markets only operate while fresh produce is in season, winter farmers markets (November - March) operate in 47 States and the District of Columbia.

The USDA's Agricultural Marketing Service (AMS) is the agency primarily responsible for programs to support farmers markets. Among other things, AMS' Marketing Services Division administers the Farmers Market Promotion Program (FMPP), a grant program initiated in 2006 that supports outreach and marketing opportunities for farmers markets. Grants are awarded on a competitive basis following comprehensive review. The FMPP offered $10 million in grants in FY 2011. To find out more about the FMPP, go to *www.ams.usda.gov/FMPP*.

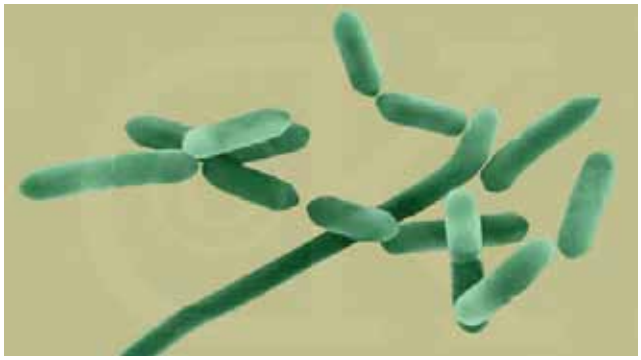
Other services AMS provides to farmers market stakeholders include technical assistance in market facility development, outreach, and organizational support, including the Farmers Market Consortium, a public/private sector partnership dedicated to supporting the farmers market industry by sharing and publicizing information about available sources of funding and technical resources.

The growth of farmers markets and the economic, social, and health benefits they provide support USDA's *Know Your Farmer, Know Your Food* initiative, a USDA-wide effort to create new economic opportunities by better connecting consumers with local producers. It is also intended to promote a national conversation on why it's important for people to know where their food comes from and how it gets to their plate.

For more information on the many resources available from AMS to support farmers markets, go to *www.ams.usda.gov/WholesaleandFarmersMarkets* or contact Debra Tropp, Chief of the AMS' Farmers Market and Direct Marketing Research Branch at (202) 720-8326 or *Debra.Tropp@ams.usda.gov*.

Looking Into FSIS' Routine *Listeria monocytogenes* Risk-Based Sampling Program: What This Means for You

By Sybil Wright



In an effort to reduce public health risks, USDA's Food Safety and Inspection Service (FSIS) has implemented a testing program to verify your compliance with 9 *Code of Federal Regulations* (CFR) 430, which addresses the control of *Listeria monocytogenes* (*Lm*) in post-lethality-exposed ready-to-eat (RTE) products. Under the Routine *Listeria monocytogenes* Risk-Based Sampling Program (R*Lm*), an FSIS team collects a sample of your RTE products, product-contact surfaces, and environmental surfaces for testing. In addition, a comprehensive Food Safety Assessment would be conducted in conjunction with the R*Lm* sampling.

FSIS selects establishments for testing based on risks associated with the type of product and control measures used by the establishment. Once the R*Lm* sampling has been conducted in your establishment, you normally won't be eligible for scheduling again for a 24-month period, provided that the sample result is negative, of course.

Let's say you've been notified that your plant has been selected for sampling. Here are some helpful pointers to guide you through the sampling process:

- FSIS highly recommends that you hold all products represented by the sample until confirmed test results are received.
- The sampling team will secure product samples and ship them to the laboratory after the establishment has completed all interventions, except for any intervention based on microbiological test results. FSIS will not wait for the establishment to receive those microbiological test results before sending the sample to the laboratory. In many cases, FSIS samples will be collected and submitted to the laboratory before the establishment completes pre-shipment review. This represents a change in policy that occurred with the issuance of FSIS Directive 10,240.4, Revision 2, on February 3, 2009.
- When FSIS takes a sample for testing, you can also take a sample and send it for testing to a certified laboratory at the same time. FSIS expects your establishment to take action any time there is a positive result, whether the result came from the agency's sample or your sample.
- It's your responsibility to determine the amount of product represented by the sample. You should consider the following factors:

  1. Your establishment's coding of product;
  2. Pathogens of concern;
  3. Processing and packing procedures;
  4. Equipment used;
  5. Same source;
  6. Your plant's Hazard Analysis and Critical Control Point (HACCP) plan, including all monitoring, verification, corrective actions, and testing procedures;
  7. Sanitation Standard Operating Procedures records; and
  8. Whether some or all of the affected products are controlled by a different HACCP plan.

- Most negative results are obtained within 3 days. Confirmed positive results may take up to 8 days. The district office will provide presumptive *Lm* positive results to you. For results of future analysis, you can receive results by email. (Contact your district office for a copy of FSIS Form 10,230-2.)

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Avoiding Noncompliance Records: Originating From Record Authenticity Requirements

By Commander Jeff Tarrant, U.S. Public Health Service

In previous issues of *Small Plant News*, we addressed some common noncompliance records (NR) originating from supporting documentation requirements. We'd like to add to that by focusing this time on common NRs stemming from record authenticity requirements.

According to 9 *Code of Federal Regulations* (CFR) 417.5(b), "each entry on a record maintained under the [establishment's] Hazard Analysis and Critical Control Point (HACCP) plan shall be made at the time the specific event occurs and include the date and time recorded, and shall be signed or initialed by the establishment employee making the entry."

FSIS inspectors are trained to review your plant's documentation records related to your HACCP plan. To help you understand the inspectors' thought processes better when reviewing your documentation, we've provided the following questions they ask themselves when gathering information on record authenticity requirements.

- Was each entry on the record made at the time the event occurred?
- Does each entry include the time?
- Was each entry on the record signed or initialed by the plant employee who made the entry?
- Does each record include the date?

The inspectors will then assess the information and determine compliance. If, after gathering and assessing information pertaining to the HACCP record authenticity requirement, the inspector finds that your plant has met all regulatory requirements, then there is regulatory compliance. If the inspector finds that you have not met all regulatory requirements, there is noncompliance.

To understand 9 CFR 417.5(b) better, let's use the following example. The Better Meat Company's (fictitious company for this scenario) HACCP plan has a monitoring procedure for checking temperatures of incoming trimmings by checking two combos from each truck with a long-stem thermometer. The FSIS inspector requests the company's HACCP records and finds the following incoming trimmings log. The inspector starts gathering information by asking himself or herself the previously listed questions while reviewing the following log.

Incoming Trimmings Log			Critical limit = 38 ºF or lower			Date: 6-8-08	
Truck ID	Truck condition	Combo ID	Source	Tracking #	Temp	Time	Monitor Initials
138	A	-981	Bexel	380001	34	4:56 am	JP
138	A	-982	Bexel	380002	34	5:05 am	JP
8526	B	-020	Donfort	380003	36	7:20 am	GM
8526	B	-021	Donfort	380004	•		

After reviewing the incoming trimmings log, the inspector notices that the last entry (truck #8526) does not contain the time the event occurred or the temperature. In addition, it does not include the signature or initials of the person performing the activity. Therefore, the inspector determines that there is recordkeeping noncompliance and an NR is generated.

This is just one example, but by familiarizing yourself with the regulations that affect your plant, you can ensure that your facility remains in compliance.

For more information on noncompliance records, visit FSIS' Web site at *www.fsis.usda.gov* or contact the Program and Policy Development Division at (800) 233-3935 or (402) 344-5000.

Commonly Asked Questions & Answers

Q. *Do pest control programs have to be written documents?*

A. No. Pest control programs addressed in 9 CFR 416.2(a) are not required by regulation to be written programs. However, they must be implemented and maintained to prevent or eliminate pest harborage and breeding within the limits of the official premises. Although such programs are not required to be written, a written program is beneficial to the establishment because it describes what actions are to be taken, when the actions are to be taken, and what is done to provide evidence that the actions were taken. A prudent establishment would focus on documenting as many aspects of its operation to demonstrate that its overall food safety system is working properly.

Q. *Can more than one of the official inspection legends (i.e., meat legend, poultry legend, or exotic animal legend) be printed on the same product container?*

A. Yes. A container of product intended for distribution to other than the retail trade may bear one or more official inspection legends. A container of product intended for sale to household consumers may only bear one official mark of inspection.

Many official establishments operate under Federal Grants of Inspection for meat products, poultry products, and exotic animal products. Considerable economic savings can be realized by these establishments when certain containers can be utilized for multiple types of inspected/passed products.

Note: A "container" is either (a) a shipping container that holds fully labeled immediate containers or (b) a shipping container that doubles as an immediate container. In either situation, the shipping containers are not meant for retail sale. Processors can print up to three inspection legends on one container and use it for either meat, poultry, exotic animal products, or a mixture thereof. The container is required to contain inspected product. The establishment using the tri-legend cartons must have a Grant of Inspection that allows production of all three types of product. All legends must be removed from the container if it is used for non-inspected product, for example, tomato sauce or vegetables.

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- If a test result is positive and you did not hold, but elected to distribute, the product, FSIS will request that you conduct a recall in a timely fashion—usually the same day—at your expense. FSIS Directive 8080.1, Revision 5, Amendment 3, provides details of the recall procedure. However, you should take every precaution to avoid a recall to protect public health and maintain consumers' confidence in your business.
- When an RTE product sample or post-lethality-exposed RTE food contact surface sample tests positive for *Lm*, an FSIS team will evaluate the results based on your control measures and will initiate the appropriate enforcement action, if warranted. In response to any non-compliance, FSIS expects you to bring your plant into compliance with all applicable regulations. After the implementation of any corrective action that is necessary to bring your plant into compliance, the in-plant inspection team will verify your corrective actions, including disposition of the product.

As always, you should fully cooperate with FSIS inspectors during Agency testing by making your establishment's test results and other supporting documents readily available.

FSIS recognizes the real-world scenarios that are unique to your situation as owners, operators, and managers of small and very small plants. Dealing with public health, consumer confidence, and economic issues can be very challenging as you make your business decisions. As a public health regulatory agency, FSIS will continue to encourage all establishments to adopt practices that will prevent adulterated products from entering commerce.

For your convenience, the link to the "Industry Best Practices for Holding Tested Products" is available at *www.haccpalliance.org/alliance/HoldingTestedProdSept1905.pdf*. To receive a copy of the guidelines or to provide comments, questions, or feedback on FSIS' Routine *Listeria monocytogenes* Risk-Based Sampling Program, contact FSIS' Policy Development Division at (800) 233-3935. A printed copy of the guidelines can be ordered through FSIS' Web site at *www.fsis.usda.gov/Science/Resources_&_Information/index.asp*.