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FSIS Issues Directive on Ante-mortem Livestock Inspection

USDA's Food Safety and Inspection Service (FSIS) has issued FSIS Directive 6100.1, Ante-mortem Livestock Inspection, to be implemented on October 1, 2007. The purpose of the Directive is to instruct inspection program personnel on how to conduct ante-mortem inspection; cancel applicable portions of the FSIS Meat and Poultry Inspection Manual that previously contained these instructions; and provide Public Health Veterinarians (PHVs) with instructions on making and documenting dispositions for livestock at ante-mortem as well as on non-ambulatory disabled cattle. The Federal Meat Inspection Act (FMIA) requires that all livestock receive an examination prior to slaughter. This Directive makes clear that if livestock are not presented for ante-mortem inspection, inspection program personnel will not be able to determine whether the carcasses are adulterated and therefore will not permit them to be marked as "inspected and passed." Furthermore, the Directive reaffirms that the new regulations regarding Specified Risk Materials (SRMs) codified the requirement that all non-ambulatory cattle offered for slaughter are to be condemned. Establishments slaughtering only market classes of swine or sheep (i.e., market hogs or lambs) can voluntarily segregate these classes of animals to facilitate scheduling of animals for slaughter, but cattle are not eligible for segregation. Inspection program personnel are to ensure humane handling of all livestock, and PHVs examine all abnormal or diseased livestock, including those set apart by the establishment or inspection program personnel. The Directive also addresses non-ambulatory disabled livestock, condemned livestock, delayed slaughter and emergency slaughter. For a detailed summary of this Directive by SMA legal counsel, Olsson, Frank and Weeda, P.C., email phyllis@southwestmeat.org. This Directive is available at: www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/6100.1.pdf.

New Draft IKE Demonstrates Direct Observation Verification

Today, the Food Safety and Inspection Service (FSIS) issued a Draft Interactive Knowledge Exchange (IKE) scenario (08D-07) dealing with direct observation verification of an establishment's corrective actions. In this scenario, a meat slaughter establishment has a CCP deviation for zero tolerance. The establishment takes corrective action pursuant to 9 CFR § 417.3(a). The establishment also documents its corrective actions, but for this occurrence, did not conduct a direct observation verification activity. The next day, the inspector is scheduled to conduct an O1 procedure of the establishment's verification activities. The inspector decides to review the records relating to the previous day's corrective action. Although the inspector determines that the establishment did document its corrective actions, he/she notices that the establishment did not conduct any direct verification of the corrective actions. The inspector informs the establishment that it failed to conduct direct observations of corrective actions as specified in 9 CFR § 417.4(a)(2)(ii). The establishment responds by noting that FSIS Directive 5,000.1, Revision 2, clarifies that direct observation of corrective actions is not required for every occurrence. In addition, the establishment demonstrates it did conduct a direct observation verification of the corrective actions for the last zero tolerance deviation and documented such observations. Given the policy in the Directive that verification activities need not be conducted for every event and that here, direct observations of corrective actions are being conducted and documented for corrective actions at some frequency, there is regulatory compliance. Comments on this draft IKE scenario are due by Friday, September 21 and should be sent to: lke@fsis.usda.gov.

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APHIS Expands Cattle Imports from Minimal Risk Countries

USDA's Animal and Plant Health Inspection Service (APHIS) announced Friday that it will expand the list of allowable imports from countries recognized as presenting a minimal risk of introducing bovine spongiform encephalopathy (BSE) into the United States. Currently, Canada is the only minimal-risk country designated by the U.S. "This rule is firmly based in science and ensures that we continue to protect the U.S. against BSE," said Bruce Knight, under secretary for marketing and regulatory programs. "It also is consistent with our commitment to promote fair trade practices and further normalizes trade with countries that institute the appropriate safeguards to prevent the spread of BSE." This rule makes final a proposed rule published in the January 9, 2007 *Federal Register*. It also builds upon and expands the rule published by APHIS in January 2005 that allowed the importation of certain live ruminants and ruminant products, including cattle under 30 months of age for slaughter from countries recognized as minimal risk. The final rule allows for the importation from Canada of: live cattle and other bovines (i.e., bison) for any use (including breeding) born on or after, March 1, 1999, which APHIS has determined to be the date of effective enforcement of Canada's ruminant-to-ruminant feed ban; blood and blood products derived from bovines, collected under certain conditions; and casings and part of the small intestine derived from bovines. APHIS conducted a thorough risk assessment following guidelines put forth by the World Organization for Animal Health (OIE) that evaluated the entire risk pathway, including mitigations in place both in Canada and the United States. The assessment found that the risk of BSE establishment in the United States as a result of these imports is negligible. The risk assessment underwent a thorough, independent peer review in which all of the reviewers concurred with APHIS' risk assessment. There are a series of interlocking safeguards in place to protect animal health from BSE transmission, including the FDA's ruminant-to-ruminant feed ban, import controls, aggressive disease surveillance and U.S. slaughter practices. Human health in the U.S. also is protected by another system of interlocking safeguards that ensure the safety of U.S. beef, such as the ban on specified risk materials from the food supply. Canada has similar safeguards in place. The final rule is scheduled for publication in the September 18, 2007 *Federal Register* and becomes effective November 19, 2007. Additional information is available at www.aphis.usda.gov.

Mark Your Calendars

for these upcoming SMA Events:

- Sept 18-20 – Developing and Implementing HACCP Plans for the Meat Industry - Texas A&M University, College Station, TX
- Oct 12-14 – SMA Annual Dove Hunt - Janecka Ranch, Waelder, TX
- Oct 17 – SMA Board of Directors Meeting - Richardson, TX
- Nov 1 - 2 – Beyond Basics: HACCP Plan Improvement Workshop - Texas A&M University, College Station, TX
- Dec 11-13 – Developing and Implementing HACCP Plans for the Meat Industry - Texas A&M University, College Station, TX



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***Listeria* Control Workshop Set for Dallas**

The North American Meat Processors Association (NAMP) is hosting the industry's next international *Listeria monocytogenes* Control Workshop for small businesses, cosponsored by SMA and the American Association of Meat Processors (AAMP). It is scheduled for Thursday, November 8, 2007, at the Embassy Suites Dallas – DFW International Airport North. Harshavardhan Thippareddi and Dr. Dennis Burson, both of the University of Nebraska, will conduct the workshop. Though October 25, the registration rate is \$295 for SMA, NAMP, and AAMP members and \$395 for non-members. The fee increases \$100 for all registrants after that. NAMP Executive Director Phil Kimball is pleased to be working closely with SMA on this workshop specifically designed for small to medium sized meat plants that produce Ready-to-Eat products. The one day workshop will offer techniques and programs specifically tailored for these companies. Registration information will soon be available on our website at southwestmeat.org.

Briefly . . .

ICFIE HACCP Workshop Slated for October: Texas Tech University's International Center for Food Industry Excellence (ICFIE) will hold a HACCP workshop, October 18-19, 2007 at the University of Texas at Arlington. The one and a half-day workshop is co-sponsored by the Texas Manufacturing Assistance Center and covers the relevant aspects of food safety within the food production industry. For more information contact Cynthia Bell at 806-745-7926, or request the registration form from Dr. Alicea Glueck-Chaloupka by emailing alicea.chaloupka@ttu.edu. Registration deadline is October 4.

UK Reports Another FMD Outbreak: UK authorities confirmed a new foot-and-mouth outbreak on the outskirts of London last Wednesday, just days after the government lifted livestock restrictions following an outbreak in Surrey last month. The government imposed a nationwide ban on all livestock movement, while scientists tried to identify the strain and origin of the disease. BBC television reported that the strain was the same as in the August outbreak, which was previously traced to a laboratory site that houses the Institute of Animal Health. Authorities ordered the slaughter of about 300 cattle and pigs in the affected area. The European Union also imposed a ban on livestock from Britain.

FSIS to Request Revision of Currently Approved Information Collection: FSIS issued a *Federal Register* notice on September 10 titled, "Notice of Request for a Revision of a Currently Approved Information Collection (Marking, Labeling and Packaging)." In accordance with the Paperwork Reduction Act of 1995 and the Office of Management and Budget regulations, this notice announces the agency's intention to request a revision of an approved information collection regarding the regulatory requirements for marking, labeling and packaging of meat, poultry and egg products because of revised estimates, which support a finding of more total burden hours. The agency is accepting comments through the Federal eRulemaking Portal at www.regulations.gov and by email at FSIS.RegulationsComments@usda.gov. This notice is available at www.fsis.usda.gov/Regulations_&_Policies/index.asp.

Import Safety Working Group Releases Report: The Interagency Working Group on Import Safety released a report titled, "Protecting American Consumers Every Step of the Way: A strategic framework for continual improvement in import safety." The report outlines an approach that can build upon existing efforts to improve the safety of imported products while facilitating trade. The group, headed by HHS Secretary Michael O. Leavitt, presented the report to President Bush last Monday. "The Strategic Framework establishes the building blocks upon which the U.S. system of import safety can be strengthened, recognizing that the U.S. enjoys one of the safest food supplies in the world," USDA Secretary Mike Johanns said in a statement. The report will serve as the foundation for an action plan providing specific short- and long-term recommendations to be presented to the President in November.

Does Your HACCP Plan Need An Update? Are You Ready for an FSIS Review?

Register now for "Beyond Basics: HACCP Plan Improvement Workshop for Raw and Cooked Product Operations," hosted by SMA, NMA, and the Texas A&M University Department of Animal Science, **November 1-2, 2007** at Texas A&M University.

Do you have decision-making documentation for your HACCP plan? Can you justify and defend your CCPs? Do you have all of your scientific supporting documentation on file? Can you support the frequency of your monitoring and verification activities? Is your inspector asking for information that you don't have? We can help you with these issues and answer your questions! This two day workshop provides a review and evaluation of your company's HACCP plan, with hands-on help to improve it. The registration form and course outline are available on our website.

Sign up today!