

What You Need to Know

Verification of Procedures for Controlling Fecal Material, Ingesta, and Milk in Slaughter Operations

Directive: # 6420.2

Effective: May 17, 2004

Cancels: FSIS Directive 6420.1 (Livestock)
FSIS Directive 6150.1, Revision 1 (Poultry)

The new directive:

- Combines two directives (Livestock and Poultry) into one;
- Combines FSIS verification procedures for meat and poultry in one directive;
- Removes instructions for pre-HACCP inspection activities that were in the two old directives;
- Specifies head, cheek and weasand meat and parts are subject to FSIS verification;
- Provides instructions to verify head, cheek and weasand meat at the completion of the harvesting process e.g. at the packaging step or when the products are put into storage containers;
- Provides additional instructions on enforcement methods including linking of NRs and evaluating systemic problems relating to zero tolerance in an establishment's food safety system;
- Provides instructions for conducting verification activities to determine whether an official establishment is complying with 9 CFR 310.18(a) 381.65(e), and 417.

The directive does NOT:

- Change FSIS policy regarding zero tolerance in livestock and poultry establishments;
- Change FSIS policy regarding the frequency of performing zero tolerance contamination checks;
- Change identification of contaminants guidance for livestock or poultry;
- Affect the disposition of livestock carcasses and carcass parts observed during post-mortem inspection to have pathological conditions;
- Affect the disposition of poultry carcasses observed to have pathological conditions during post-mortem inspection or reinspection (9CFR 381.76 and 381.91).

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It applies to:

Inspected establishments that slaughter livestock

Zero tolerance on:

- Carcasses
- Head
- Cheek
- Weasand meat

Inspected establishments that slaughter poultry

- Poultry carcasses

What it means:

In slaughter establishments, fecal contamination on carcasses is the primary avenue for contamination by pathogens. Pathogens may reside in fecal material, both in the gastrointestinal tract and on the exterior surfaces of the animal or bird going to slaughter. FSIS enforces a “zero tolerance” standard for visible fecal material on poultry carcasses and no visible fecal material on carcasses, head, cheek, and weasand meat at inspection establishments that slaughter livestock.

Section I: Livestock

Inspection for Fecal Material, Ingesta and Milk

FSIS provides instructions to Inspection Program Personnel (IPP) on how to verify that meat from heads, cheeks, and weasands – beef carcass parts that may become contaminated with feces, ingesta, or milk – are not contaminated with these substances. Meat from these parts is often used in ground beef products. If the meat from these products becomes contaminated, it can become a way for pathogens, including *E.coli* O157:H7, to get into ground beef.

Heads, cheeks, and weasand meat may not be part of the carcass at the time it passes the final rail inspection. Verification by FSIS that the parts are not

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contaminated may not occur at this point in the process. IPP are to verify that these parts are not contaminated by fecal material, ingesta or milk at the completion of the harvesting process e.g., at the packaging step or when the products are put into a container for storage.

Regulatory Requirements regarding fecal material, ingesta and milk for livestock carcasses and parts:

9CFR 310.18(a) states: ***Carcasses, organs, and other parts shall be handled in a sanitary manner to prevent contamination with fecal material, urine, bile, hair, dirt, or foreign matter; however, if contamination occurs, it shall be promptly removed in a manner satisfactory to the inspector.***

A HACCP plan must include, as appropriate, critical control points that are designed to control identified food safety hazards (9 CFR 417.2(c)(2)). *E.coli*, as a known adulterant and contained in fecal material, is considered a biological hazard reasonably likely to occur. IPP are to verify that establishments have adopted controls that demonstrate effectiveness in reducing the occurrence of pathogens, including controls that prevent contamination of carcasses with fecal contamination, milk and ingesta.

Section II: Poultry

Fecal Contamination Inspection

FSIS provides instructions to inspection program personnel on conducting fecal contamination checks for each evisceration line for every shift. (The number of checks will total at least 2 times the number of shifts times the number of lines.)

Regulatory Requirements regarding poultry fecal contamination:

9 CFR 381.65(e) states: ***Poultry carcasses contaminated with visible fecal material shall be prevented from entering the chilling tank.***

A HACCP plan must include, as appropriate, critical control points that are designed to control identified food safety hazards (9CFR 417.2(c) (2)). Fecal

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material is a vehicle for pathogens, and microbiological contamination is a food safety hazard that can occur in the production process. Therefore, establishments must control the occurrence of pathogens on products, including preventing poultry carcasses contaminated with visible fecal material from entering the chilling tank.

Section III: Documentation

Verification check results when performing 03J01 Procedures

Off-line inspection program personnel record 03J01 procedures as performed on the Procedure Schedule each time they perform verification checks and do not find fecal material, ingesta or milk contamination. If fecal material on poultry or fecal material, ingesta, or milk on livestock carcasses or on head, cheek or weasand meat is found, the monitoring trend indicator should be marked.

If **any** HACCP regulatory noncompliance is found during the 03J01 procedure, the 03J02 procedure will be performed on that specific production lot. All regulatory requirements should be verified while IPP perform the procedure, including corrective action requirements.

Verification check results when performing 03J02 Procedures

When off-line IPP perform the 03J02 verification procedures and do not find fecal material, ingesta or milk contamination, and no other regulatory noncompliance is observed, the 03J02 procedure is marked as performed on the Performance Schedule.

If identifiable fecal material on poultry carcasses or fecal material, ingesta, or milk on any carcass, head or weasand meat is observed while performing 03J02 procedures, IPP are to notify the establishment and complete this procedure before completing FSIS Form 5400-4, Noncompliance Record (NR) documentation. There is no need to perform another 03J02 procedure as all requirements including corrective action can be verified by IPP. When the 03J02 procedure is complete, IPP will document all noncompliances on an NR using the appropriate trend indicator. If the only noncompliance observed was the fecal material, ingesta or milk contamination, the monitoring trend would be used.

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Section IV: Enforcement

If IPP find repeated fecal material noncompliances and determine that these findings are from the same cause, the NRs should be linked. When linking NRs, inspection personnel are to follow the methodology outlined in FSIS Directive

5000.1 Revision 1, Chapter IV, Enforcement, CSIs, Part VI, Linking NRs. The NRs should not be linked if the findings are not from the same cause.

When the Inspector-in-Charge (IIC) has concerns about whether the documented fecal findings indicate a systemic problem, the IIC should review all relevant records, including,

- Generic *E. coli* results
- Compliance with HACCP requirements
- Sanitation SOP compliance
- Sanitation Performance Standard compliance
- Salmonella test results
- Other microbiological testing results

IICs should consider the following when making determinations about fecal findings that may be a systemic problem with the slaughter food safety system:

- What is the rate of noncompliance?
- Has the establishment effected meaningful preventive measures?
- Has the rate of noncompliance decreased?
- Does the generic *E. coli* testing indicate a problem with the sanitary dressing procedures or sanitation in the establishment?
- Are there indications that other parts of the HACCP system are not appropriately designed to prevent food safety hazards?
- Is the establishment doing other testing that is relevant? What are the results of those tests?
- Are all parts of the HACCP system being implemented as designed?
- Are there indications that the establishment's antimicrobial interventions are not operating as intended?
- Does the establishment's microbiological testing program results have spikes that might indicate problems with sanitation? Does the establishment implement corrective actions to eliminate problems that exist?

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If the IIC determines that repetitive findings of fecal material, ingesta and milk represent a developing trend, the NRs would be linked to document that the slaughter process is not effective in preventing contamination on carcasses. This could lead to the determination that the food safety system is inadequate. Refer to FSIS Directive 5000.1 Revision 1, Chapter IV, Enforcement, Rules of Practice to determine appropriate enforcement action.