

RISK MANAGEMENT

Current FSIS Activities

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FSIS is the nation's *public health* regulatory agency, housed in USDA, addressing meat, poultry, and egg products

- FSIS has the administrative responsibility for protecting consumers from harm and deceit associated with these products
- FSIS operates under 3 statutes providing authority to inspect these products and to ensure that they are not *adulterated* or *misbranded*:
 - **FMIA** - Federal Meat Inspection Act (enacted 1907)
 - **PPIA** - Processed Poultry Inspection Act (enacted 1957)
 - **EPIA** - Egg Products Inspection Act (enacted 1970)

Risk Management

1999 Reassessment

Compliance with the HACCP system regulations (64 FR 28351, May 26, 1999)

- Almost all plants responded by taking some action
 - A majority of plants addressed *Listeria monocytogenes* in the hazard analysis
 - Many plants deleted CCPs; handled in Sanitation SOPs
 - A very small proportion of plants used antimicrobial additives; one out of five plants addressed this use in their HACCP plan
 - Over two-thirds of the plants conducted environmental testing at least weekly
 - Less than two-thirds of the plants conducted product testing

Risk Management

2001 Proposed Rule

Performance Standards for the Production of Processed Meat and Poultry Products (66 FR 12590, February 27, 2001)

- Addressed control of *Listeria monocytogenes* either in:
 - HACCP plan (i.e., food safety hazard reasonably likely to occur after lethality treatment), **or**
 - Sanitation SOPs by testing food contact surfaces (after lethality treatment but before final packaging) for *Listeria spp.* at a specified frequency
- Testing used to verify that the Sanitation SOPs were effective
 - Results had to be available to FSIS for review
 - If a test result was positive, corrective actions had to include procedures to demonstrate that product was not adulterated

Risk Management

Existing Directive

- 10,240.2 – Microbial Sampling of RTE Products
 - Effective since January 24, 2001 (revision 1; amendment 1)
 - FSIS collects product sample if plant does not test:
 - One product/HACCP Plan/month, or
 - One product every 3 months and
 - Conducts on-going environmental tests (both food contact surface and non-food contact surface tests) for indicator organism
 - Conducts targeted product testing for *Listeria monocytogenes* when there is a positive result for *Listeria* spp. on a food contact surface

Risk Management

Draft Directive

- 10,240.3 – Microbial Sampling of RTE Products for the FSIS Verification Testing Program
 - Draft for comment available today on the FSIS website until December 2, 2002; effective December 9, 2002; FSIS focus:
 - Deli/hot dog products in large plants (high/medium risk)
 - Smaller plants with high volume, NRs, construction
 - FSIS will collect multiple product and environmental samples if plant does not:
 - Have a HACCP Plan, Sanitation SOP, or other prerequisite program that is scientifically-based, includes testing for *Listeria monocytogenes* or indicator organisms, or shares testing results

Risk Management

2002 FSIS Survey

- FSIS in-plant personnel in RTE operations producing deli/hot dog products
 - Unpeeled; peeled; whole; chopped/formed; sliced
 - Approximate production volume per shift; number of shifts; number of lines; number of production weeks; storage capacity (e.g., during hold/test)
 - Use of antimicrobial agent; validation support
 - Use of post-lethality treatment; validation support
 - On-going microbiological sampling program
 - Samples/week; action taken when indicator/pathogen found; frequency/intensity changes based on positive results; where program is addressed (HACCP Plan; Sanitation SOP; Other Prerequisite)

Risk Management

2003 Reassessment

- Annual adequacy determination of the HACCP Plan
 - Includes determining whether the hazard analysis has been affected by recent events. Also, for RTE operations:
 - Sanitation SOP – Plant must routinely evaluate the effectiveness of the procedures (for high/medium risk operations, FSIS will focus on environmental testing results as one measure of effectiveness)
 - Prerequisite Program – Plant must document why a food safety hazard is not reasonably likely to occur and include the procedures and testing results it employs to ensure that the program is working (for high/medium risk operations, FSIS will focus on environmental testing results as one measure of effectiveness)

Risk Management

2003 Final Rule

- FSIS will be evaluating the effectiveness of the Directive
- FSIS will be completing work on the FSIS risk assessment, addressing cost/benefit scenarios
- FSIS will be publishing a science-based regulation

Stakeholder Input

- Today, FSIS is listening to stakeholders about feasible and effective measures to control *Listeria monocytogenes*:
 - Dr. Randall Huffman will talk about practical considerations for controlling *Listeria monocytogenes*
 - Dr. Payton Pruett will talk about the role of environmental and product testing
 - Dr. Don Zink will talk about post-lethality treatments

Contact Information

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Web-based Meat, Poultry, and Egg Policy Documents

<http://www.fsis.usda.gov/OPPDE/rdad/publications.htm>