National Advisory Committee on Meat and Poultry Inspection

Applying the Mark of Inspection to Product Tested for an Adulterant: Guidelines for Industry for Holding Products When Sampled

Purpose

In June 2004, FSIS presented an issue to the National Advisory Committee on Meat and Poultry Inspection (NACMPI) concerning whether FSIS should not apply the mark of inspection to product that has been tested for an adulterant until the Agency has received the results of the testing. The Committee considered the issue and its impact on small and very small establishments and made a number of recommendations to the Agency. The Committee did not reach a consensus on whether the Agency should implement a test and hold policy for product it samples for adulterants. It recommended that the Agency continue to encourage plants to develop a plan for holding products when they are sampled for adulterants. The Committee further recommended that FSIS provide guidance to plants regarding holding products, and that FSIS should work with the industry on strategies that would mitigate some of the practical problems associated with holding products.

FSIS considered the advice of the Committee. The Agency has also met with industry about this issue. A group of industry trade associations have also drafted guidance for establishments on holding products when the Agency samples. (The Agency has first drafted guidelines focused on providing practical advice to small and very small establishments for holding products when the Agency samples for adulterants.) The Agency is presently seeking advice on the most effective way to provide the guidance to industry, especially to small and very small plants.

Discussion

A review of FSIS recall data indicates that approximately one-third of the total recalls of meat and poultry products since 1997 were triggered by FSIS testing for adulterants. The most recent FSIS recall data indicate that as of May 11, 2005, 33.3 percent of the recalls for calendar year 2005 fall into this category. Small or very small establishments conducted most of these recalls.

Although the majority of plants do hold products when the Agency samples, these data reveal that a significant number of establishments do not. These recalls would have been avoided if the establishment had executed a plan to hold products represented by Agency verification sampling.

Recalls are resource intensive and costly in numerous ways for both the Agency and the industry. More importantly, keeping potentially adulterated product out of commerce protects public health and obviously is in everyone's best interest.

The Agency and industry agree that encouraging establishments to hold all products represented by Agency verification samples and providing them with usable guidance is a practical way of avoiding preventable recalls.

Questions

1. Should the Agency issue its guidelines for holding product when sampled?

2. What should be the focus of Agency guidance for holding products when sampled?

3. Should the Agency and industry issue their guidelines simultaneously?

4. Alternatively, should the Agency wait until the industry issues its guidance, and then determine its effectiveness before deciding whether to issue Agency guidance?

Contact Person

Charles L. Gioglio, Director
Inspection and Enforcement Initiatives Staff
Office of Policy, Program and Employee Development
Phone: 202-205-0010