FSIS Directive 6410.1

Verifying Sanitary Dressing and Process Control Procedures in Slaughter Operations of Cattle of any Age

Purpose

- Provides any IPP who conduct off-line slaughter verification duties with the following information:
  - How to verify that cattle slaughter operations are focusing on sanitary dressing and process control
  - How to verify that establishment's have validated their HACCP systems *(specifically related to slaughter operations)*

Note

- The information in this directive focuses on the slaughter operation, beginning with live cattle receiving through the final rail

- The verification information in this directive applies to any IPP, in any size slaughter establishment, that have the responsibility to conduct off-line duties

Key Points

- Define Process Control Procedures
- Define Sanitary Dressing
- Describe the purpose of sanitary dressing and process control procedures
- Describe the points in the slaughter process where carcass* contamination with food safety hazards, including *E.* coli O157:H7 and *Salmonella*, are most likely to occur

For the purposes of this directive, 'carcass' refers to carcasses as defined in 9 CFR 301.2

Key Points
(Continued)

- Describes how the establishment's failure to properly execute its sanitary dressing and process control procedures can increase the risk of carcass contamination at various points in the slaughter operation

Key Points
(Continued)

- Provide instruction on how to verify that cattle slaughter operations are:
  - implementing appropriate sanitary dressing and process control procedures to both prevent contamination of the carcass; and
  - to properly apply decontamination and antimicrobial intervention treatments to the carcass

Key Points
(Continued)

- Provide instruction on how to verify that the establishment is properly assessing the impact of microbial testing results, including indicators of process control, at:
  - any point during slaughter; and
  - at subsequent trim fabrication and grinding operations

Key Points
(Continued)

- Provide information regarding the total food safety system and how each aspect of the system are factors to be considered when determining regulatory compliance
- Provide information regarding documenting noncompliance and enforcement

New Emphasis

- Verification of sanitary dressing and process control begins at receiving of cattle, not at the final rail
- The Agency's expectation is that the sanitary dressing and process control procedures being implemented be in a written document

New Emphasis

- Noncompliance is not automatic. The CSI considers a variety of factors.
- FSIS has identified typical locations in the slaughter process where carcass contamination is most likely to occur.

Definitions

- ***Process Control Procedure:*** A defined procedure or set of procedures designed by an establishment to provide control of operating conditions that are necessary for the production of safe, wholesome food

Definitions
(Continued)

- Process Control Procedures typically include:
  - observing or measuring system performance
  - analyzing the results to develop measures to ensure the process remains under control
  - taking action when necessary to ensure that the system continues to perform within the control criteria
  - planned measures taken by the establishment in response to any loss of process control
  - Procedure can be used as support for decisions made in the hazard analysis

Definitions
(Continued)

- ***Sanitary dressing:*** Practice of handling carcasses by establishment employees and machinery, throughout the slaughter process, in a manner that produces a clean, safe, wholesome meat food product in a sanitary environment

Background

- Establishments are expected to slaughter and process cattle in a manner designed to prevent contamination of carcasses
  - 9 CFR 310.18(a) requires prevention of carcass contamination
  - 9 CFR 416.1 requires establishments to operate in a manner that does not create insanitary conditions or contaminate product

Background
(Continued)

- Establishments **may** employ practices such as:
  - Adequate separation of carcasses, parts and viscera
  - Routinely cleaning/sanitizing equipment used to cut carcasses
  - Good employee hygiene practices
  - Implementing decontamination and antimicrobial intervention treatments

NOTE: The verification activities addressed in this directive are to be used in conjunction with, and can be conducted simultaneously with (i.e., at the same time), those addressed in the following directives:

- FSIS Directives 6100.1, Ante-mortem Livestock inspection
- FSIS Directive 6100.2, Post-mortem Livestock Inspection
- FSIS Directive 6420.2, Verification of Procedures for Controlling Fecal Material, Ingesta and Milk in slaughter operations

FSIS Verification

- Every other week, during the performance of the **scheduled** weekly 06D01 procedure, off-line IPP are to verify the establishment's sanitary dressing and process control procedures
  - Primary focus is on all aspects of the establishment's sanitary dressing and process control procedures
  - In addition, verify any additional SPS requirements (e.g. lighting, plumbing, rodent and pest control) in accordance with FSIS Directive 5000.1, as time allows

FSIS Verification
(Continued)

NOTE: Off-line IPP are to evaluate the sanitary dressing and process control procedures in relation to the food safety system and not just one step of the process

FSIS Verification
(Continued)

- On the alternate week, off-line IPP are to focus their verification on one or more of the SPS requirements (e.g., lighting, plumbing, rodent and pest control) in accordance with FSIS Directive 5000.1
  - In addition, verify as many of the aspects of the establishment's sanitary dressing and process control procedures, in accordance with this directive, as time allows.

FSIS Verification

(Continued)

- Based on the information gathered while conducting the verification methodology presented in this directive, off-line IPP may believe there is evidence of systemic conditions that affect sanitary dressing and process control
  - IPP may perform a focused verification of the sanitary dressing and process control procedures more frequently than once every other week if it is determined to be necessary by supervisory personnel

FSIS Verification
(Continued)

- An additional 06D01 procedure can be performed as an unscheduled procedure:
  - In lieu of a scheduled 04C03 procedure
  - In lieu of a scheduled 01C02 if the 04C03 procedure has already been replaced with an 08S procedure
  - During overtime operations as necessary

Potential Contamination Points

- FSIS has identified the points in the slaughter process where carcasses are most vulnerable to contamination
- The points are identified to help off-line IPP focus their verification to ensure that:
  - Contamination events are effectively prevented
  - The slaughter process is completed in a timely manner prior to chilling the carcass

NOTE

- When IPP conduct routine verification at the following points in the slaughter process, personal safety is paramount
- Verifications are to be conducted from a safe vantage point, especially at the sticking and rodding locations
- FSIS personnel are to follow good employee hygiene practices in order to ensure that their verification activities do not result in cross contamination of the carcasses

Potential Contamination Points

(Continued)

- Live Receiving/holding
- Sticking
- Hide Removal
- Bunging
- Head Removal
- Rodding the weasand
- Evisceration
- Carcass Splitting
- Head and Cheek Meat Processing

A series of questions are provided for IPP to ask at each step in order to gather information related to the control of the process

NOTE

- The steps listed in this directive are *not* all-inclusive
- The steps listed in the directive are in a sequential order (start to finish) *for ease of presentation only*
- IPP are *not* required to verify them in that same sequential order

Validated Interventions

- Provides an introduction to validation:
  - When contamination overwhelms the decontamination and antimicrobial interventions, the establishment may no longer be able to reduce *E.*coli O157:H7 to below detectable levels
  - Until the CCP is demonstrated to achieve its anticipated effect under in-plant conditions, the CCP is theoretical and not adequately validated
  - Hazard analysis must include all documentation that supports the food safety system

Validated Interventions
(continued)

- FSIS Verification of Validation
  - Once per month, as it relates to sanitary dressing and process control, off-line IPP are to consider the food safety system when verifying that the establishment is meeting its responsibility to reduce E.coli O157:H7 to below detectable levels

Validated Interventions
(continued)

- FSIS Verification of Validation **(continued)**
  - Review interventions, supporting documentation and any available testing records

A series of questions are provided for IPP to ask in order to gather information related to the validation of the process

Note: IPP are to continue to follow the instructions regarding validation provided by Kenneth Petersen, Assistant Administrator, through the District Managers, in his letter titled "Clarification on In-Plant Validation Requirements" (dated February 12, 2009)

Determining Noncompliance

- Use the information gathered while performing verification procedures to determine compliance
- Document noncompliance in accordance with FSIS Directive 5000.1
- Cite 9 CFR 310.18(a) on Noncompliance Record (NR)

A series of questions are provided for IPP to ask in order to assist in the determination of compliance