

# Small Plant NEWS

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## Small Plant NEWS

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## Common Food Safety Violations Documented by Federal Regulatory Agencies, Part II

By Commander Jeff Tarrant, U.S. Public Health Service

In July 2011, the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) and Agricultural Marketing Service (AMS) and the U.S. Department of Health and Human Services' (HHS) Food and Drug Administration (FDA) developed a food safety cross-training program to strengthen communication and collaboration efforts among USDA and HHS agencies on food safety issues in shared jurisdiction facilities. As part of the program, the agencies devised a method to ensure that any food safety violations that employees observe while conducting their normal day-to-day duties at federally regulated establishments are reported to the agency with jurisdiction over the violation.

What were the common violations noted by the three agencies? The *Small Plant News* editorial staff decided to answer this question by examining "significant observations" from each agency's training material. What we found is best broken down into the following categories: General Facility, Processing, Storage, and Employee Health and Hygiene.

In *Small Plant News*, Volume 5, Number 8, we looked at common food safety violations documented by Federal regulatory agencies related to General Facility and Processing observations. In this issue, we'll examine Storage and Employee Health and Hygiene violations.

First, let's review Storage violations. Some common issues that arise during inspections involve the placement of pesticides, insecticides, and cleaning solutions in storage areas. On numerous occasions, open containers of pesticide bait placed near food products have been noted by inspectors. During one inspection, for instance, rodent bait was found in apple storage bins and in the raw-ingredient side of a baby food processing line. If the problem hadn't been detected, infants could have been sickened and/or killed. This is why pesticides, insecticides, and cleaning supplies must be used and stored properly. Rodent and insect bait stations should be designed to eliminate spillage into processing and storage areas and placed where they will not contaminate food or food contact surfaces.

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Another observation involves improperly cooling food products in storage areas. For instance, potentially hazardous food items (e.g., those high in protein or carbohydrates, with a pH above 4.6 and a water activity above 0.85) have been documented as being held for long periods of time at room temperature (usually more than 2 hours) and not being actively processed. Some of the items included cooked vegetables and grains, soups, gravy, raw shell eggs, egg products, meat, seafood, and ready-to-eat foods. Often times, improperly cooked products can be a result of coolers and freezers that are not properly maintained. Remember that coolers should maintain food at or below 41 °F, and freezers should maintain food in a frozen state, ideally between 0 and 10 °F. Be aware that the air temperature can fluctuate in coolers because of the frequent opening and closing of the doors. Therefore, collect your readings prior to opening the door or entering the area.

Other observations include the possibility of cross contamination when raw ingredients are stored near finished product in a manner that exposes them to microbial contamination. An example of this involves storing raw meat above or adjacent to ready-to-eat foods, such as cooked product or raw vegetables, in a refrigerated storage area. Ideally, facilities should have dedicated coolers for storing raw meat products. In addition, cross contamination can occur when food products are improperly covered or when retained/quarantined products are accidentally mixed with products not under quarantine or retention. Products must be covered or sealed in a container to reduce the likelihood of accidental or intentional contamination, and establishments should segregate and label damaged and/or retained/quarantined containers of food to ensure that they are not used by mistake.

One issue that should be addressed is the transportation of raw and finished products. Product contamination can occur when raw materials are transported on unclean or improperly maintained vehicles. As a result, containers can become grossly contaminated, and frozen or refrigerated ingredients may become contaminated if not held at a cold temperature. Essentially, trucks should be dedicated to transporting food and not used for waste products and toxic substances. When a vehicle is used to transport both raw and finished products, they should not be mixed together. The raw products should be transported separately, and the vehicle should be thoroughly cleaned and sanitized before transporting finished products.

One real-life scenario involved the cross contamination of ready-to-eat food in 1994, which led to a nationwide outbreak of salmonellosis that was responsible for sickening an estimated 224,000 people in the United States. It was later determined that the outbreak occurred because the pasteurized ice cream pre-mix was delivered to a facility in a tanker truck that had previously transported raw, unpasteurized eggs. The tank hadn't been properly washed and sanitized between loads, and the raw egg mix was contaminated with *Salmonella enteritidis* bacteria.

Next, we'll look at Employee Health and Hygiene violations that have been documented by Federal inspectors. One of the gravest violations, and often the simplest to fix, is a lack of accessible hand washing facilities (with soap, water, and a dryer or towels) within an establishment. Since proper hand washing is a key defense against the spread of pathogens between employees and product, it is critical and required by law to provide and properly maintain hand washing stations.

Another issue that arises is the lack of an employee health and hygiene training program in food service facilities. Usually, poor hygienic practices demonstrated by employees indicates a lack of proper training and interest in the quality of products produced by the establishment. Good hygienic practices include the wearing of clean lab coats, hair nets, arm guards, and intact gloves. If food service gloves are used as a barrier against contamination, they must be changed when they become soiled or damaged. In addition, employees must wash their hands prior to putting the gloves on.

When it comes to employee health, Federal inspectors have documented incalculable instances of employees who exhibited symptoms of infectious disease while handling or processing food products in establishments. After a recent foodborne illness outbreak investigation in the United States, it was determined that the causative agent, *Staphylococcus aureus*, was traced back to an infectious employee at a bakery. Don't allow this to happen in your facility. If employees are diagnosed with or exhibiting symptoms of an infectious disease while at work, send them home and recommend they visit their primary healthcare facility. Do not permit them to return to work until cleared by a doctor.

For more information on food safety regulatory requirements, visit the following food safety Web sites: [www.fsis.usda.gov](http://www.fsis.usda.gov), [www.fda.gov](http://www.fda.gov), and [www.ams.usda.gov](http://www.ams.usda.gov).

# Guidance for Establishments Affected by a Natural Disaster

By Jane Johnson, DVM



If you own or operate a meat, poultry, egg products, or retail and foodservice establishment, you may have asked yourself at some point, “where on the FSIS Web site can I find guidance that identifies food safety factors that I should consider as I resume operations in an area affected by a hurricane, flood, natural, or other disaster?” You can find this type of information at [www.fsis.usda.gov/FSIS\\_Employees/TSC\\_Technical\\_Guidance/index.asp](http://www.fsis.usda.gov/FSIS_Employees/TSC_Technical_Guidance/index.asp).

On this Web page, you’ll find links to technical guidance such as a checklist outlining the steps to take in the event of flooding; questions and answers identifying food safety and other issues in areas

affected by natural disasters; emergency action food safety suggestions and information for retail and foodservice establishments resuming business in the aftermath of natural or other disasters; and guidelines for FSIS personnel that you may also find useful regarding information for discussion to assist in identifying possible food safety issues in processing and slaughter establishments.

For more information or if you have any questions, feel free to contact the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or email [InfoSource@fsis.usda.gov](mailto:InfoSource@fsis.usda.gov).

## Countertop Food Safety Training Program Provides a Hands-On, Easy Approach for Food Service Workers

By Jane Johnson, DVM

The *Countertop Food Safety Training Program for Employees of USDA-Inspected Egg, Meat, and Poultry Establishments* is a bilingual (English and Spanish) training program that provides an educational tool for the processed egg, meat, poultry, and other food processing industries to train their Spanish-speaking line employees on essential concepts in short periods of time. It is intended to provide operators an educational tool that recognizes these workers’ cultural and linguistic differences.

The following eight modules can be presented to small audiences in informal settings in 20-30 minutes: the ABCs of Food Safety; Cross Contamination; Personal Hygiene;

Hand Washing and Gloves; Sanitation; Allergens; Food Defense; and ABCs of HACCP.

The training program was prepared under a USDA-FSIS cooperative agreement by Cathy Cutter of Pennsylvania State University, in cooperation with Sergio Nieto-Montenegro of Hispanic Workforce Management, LLC. The modules are posted on FSIS’ Web site at [www.fsis.usda.gov/FSIS\\_Employees/Counter\\_Top\\_FS\\_Training/index.asp](http://www.fsis.usda.gov/FSIS_Employees/Counter_Top_FS_Training/index.asp). Limited hard copies are also available for distribution. Please contact the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or email [InfoSource@fsis.usda.gov](mailto:InfoSource@fsis.usda.gov).

# Commonly Asked Questions & Answers

**Q.** *Does the agency expect cattle slaughter establishments to determine that Escherichia coli (E. coli) O157:H7 is a hazard reasonably likely to occur (RLTO)?*

**A.** Yes, the agency expects cattle slaughter establishments to address the food safety hazard of *E. coli* O157:H7 in their HACCP plans because of the prevalence of the pathogen shed by cattle transported to slaughter. In 2002, the agency published a *Federal Register* Notice (Docket No. 00-022N), titled *E. coli* O157:H7 Contamination of Beef Products, in which FSIS outlined the agency's position:

"The regulations require that establishments develop Hazard Analysis and Critical Control Point (HACCP) plans that include critical control points (CCPs): points, steps, or procedures in a food process at which a control can be applied, and, as a result, a food safety hazard can be prevented, eliminated, or reduced to acceptable levels. FSIS considers an acceptable reduction for *E. coli* O157:H7 to be a reduction to an undetectable level. Because controls to reduce the risk of *E. coli* O157:H7 contamination when the product is still intact may be the best means of controlling the hazard, FSIS believes that slaughter establishments...should strongly consider putting in place one or more validated CCPs that are designed to eliminate or reduce *E. coli* O157:H7 and other pathogens. If such establishments have controls in place to address *E. coli* O157:H7 specifically, they cannot conclude that the pathogen is not a hazard reasonably likely to occur in the absence of those controls. FSIS believes that any interventions that slaughter establishments...use to address *E. coli* O157:H7 should be incorporated into their HACCP plans. At this time, FSIS is not aware of any prerequisite programs that are appropriate for use in slaughter...to address *E. coli* O157:H7."

The agency is not aware of any pre-harvest strategy that can reduce or eliminate the pathogen to non-detectable levels prior to cattle being transported for slaughtering. Therefore, a cattle

slaughter establishment needs to address this known food safety hazard in its cattle slaughter process with a CCP (9 CFR 417.1). Cattle slaughter establishments need to ensure that the design and execution of the CCP addressing *E. coli* O157:H7 ensures that by the end of the slaughter process, the pathogen is reduced to non-detectable levels or is eliminated on the cattle carcasses that establishments fabricate or ship into commerce. Robust verification testing results from trim manufacturing, applied through appropriate statistical process control systems, have proven to be an accurate way for slaughter establishments to assess the effectiveness of the slaughter operation. Published scientific studies have demonstrated that there are effective decontamination methods that can be used for preventing, eliminating, or reducing *E. coli* O157:H7. The slaughter establishment may use antimicrobial agents (FSIS Directive 7120.1, *Safe and Suitable Ingredients Used in the Production of Meat, Poultry, and Egg Products*) or other interventions to ensure its slaughter process reduces or eliminates the pathogen to non-detectable levels. Posted on FSIS' Web site are resources to assist small and very small slaughter establishments ([www.fsis.usda.gov/Science/Small\\_Very\\_Small\\_Plant\\_Outreach/index.asp](http://www.fsis.usda.gov/Science/Small_Very_Small_Plant_Outreach/index.asp)).

**Q.** *The 2008 Farm Bill provides that establishments selected to participate in the cooperative interstate shipment program must be "in compliance with" all Federal standards. Why does the new interstate shipment program need to operate under standards that are the "same as" those imposed under the Federal program when States already have programs that are "at least equal to"?*

**A.** The Federal Meat Inspection Act (FMIA) and Poultry Products Inspection Act (PPIA), as amended by Congress in the 2008 Farm Bill, expressly state that the cooperative interstate shipment program must operate under standards that are the "same as" those imposed under the Federal program.