

Small Plant NEWS

Vol. 5, No. 11

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Small Plant NEWS

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FSIS' Food Defense Plan Survey: The Results Are In. What Was Your Impact?



By Natasha Williams

The U.S. Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) completed its annual survey of slaughter and processing plants for Fiscal Year 2011 on the presence of food defense plans. This initiative began in 2006 to measure the industry's voluntary adoption of written food defense plans and to determine whether the plans are functional, meaning "Have they been implemented, tested, and reviewed?"

FSIS' 6th Food Defense Plan Survey was conducted in July 2011,

and, similar to past surveys, the facilities involved were plants that are active FSIS-regulated meat and poultry slaughter and processing plants, active official import inspection plants, or active processed egg products plants. The numbers are in, and while the percentage of plants with a functional plan has surpassed the 74 percent goal that was set for 2011, the participation rate of very small plants still lags behind the participation rate of small and large plants.

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July 2011 Food Defense Plan Survey Results				
Establishment Size	Percent of Establishments With a Functional Food Defense Plan			
	Meat & Poultry Establishments	Processed Egg Product Plants	Official Import Establishments	Overall
Large	96%	100%	(none)	96%
Small	84%	92%	57%	84%
Very Small	64%	78%	82%	65%
Overall	75%	93%	78%	75%

Plants of any size can only gain from having a functional food defense plan on hand. Establishing a plan enhances the protection of your plant and products from vulnerabilities that can cause a potential threat to the food supply, as well as your livelihood.

According to Dr. Byron Williams, assistant professor in the Department of Food Science, Nutrition, and Health Promotion at Mississippi State University, having a functional food defense plan is “a matter of security for the continued well-being of their business. In the event of an incident, a functional food defense plan aids in reducing the harm a very small plant could experience as a result of negative publicity and lost business. As a very small plant, even the smallest incident could potentially have a major impact on the business.”

In December 2009, 49 percent of very small plants had functional food defense plans compared to 72 percent of small plants and 97 percent of large plants. Fast forward to 2011 where 65 percent of very small plants have a functional plan compared to 84 percent of small plants and 96 percent of large plants.

While it is commendable that the number of very small plants with functional plans has increased approximately 20 percent in the past 2 years, an evaluation of the difference between the participation of very small plants and that of small and large plants shows that there may be a misunderstanding regarding what it takes to have a functional food defense plan.

2006 - 2010 Food Defense Plan Survey Results					
Establishment Size	Percent of Meat and Poultry Establishments With a Food Defense Plan				
	Aug. 2006	Nov. 2007	Aug. 2008	Dec. 2009	Jul. 2010
	Written Plan	Written Plan	Written Plan	Functional Plan	Functional Plan
Large	88%	91%	96%	97%	97%
Small	48%	53%	64%	72%	82%
Very Small	18%	21%	25%	49%	64%
Total	34%	39%	46%	62%	74%

You may think that you must spend a lot of money or hire more employees to develop a functional food defense plan. In fact, functional food defense plans can be created without additional funds or staff. Having a functional plan means that your plan can be implemented at a moment's notice and contains tasks that can be performed on a daily basis.

For example, if an employee's duty is to monitor entry and exit doors to ensure they are properly locked, delegate this task in your functional plan to the person in charge of monitoring security for the plant. By putting this in writing, you are not spending extra money or hiring new staff. Instead, you now have a “go to” person who is responsible for maintaining that aspect of the plant. This also prepares you for a faster response time in the event that security is breached.

Another example of a possible misunderstanding of having a functional food defense plan is that it takes too much time to write one. FSIS has created a general food defense plan titled, “Food Defense Plan: Security Measures for Food Defense.” The general plan is available online at www.fsis.usda.gov/PDF/General-Food-Defense-Plan-9-3-09%20_2_.pdf and is also available in hard copy. This document outlines four of the major security measures that can lead to a plant's vulnerability. They include, but are not limited to, outside security measures, inside security measures, personnel security measures, and incident response security measures. You may tailor this general plan to the potential threats and needs of your plant. The general plan is also available in the following languages: Korean, Mandarin, Spanish, and Vietnamese.

Alternatively, you may decide to develop a functional food defense plan using the guidance materials available on FSIS' Web site at www.fsis.usda.gov/Food_Defense_&_Emergency_Response/Guidance_Materials/index.asp, although this may be the more challenging option.

Results from the survey show that 959 very small plants lack a functional food defense plan. If you're an owner or operator of a very small plant, please know that your plant is potentially at risk without this document. To continue

to protect the public's health and your own livelihood, it's imperative that you create and maintain a functional plan. Don't let the perception of spending more time or money deter you from protecting your plant. Make an impact in 2012!

For more information on functional food defense plans or to obtain a hard copy of the general food defense plan, contact the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or email InfoSource@fsis.usda.gov.

The International HACCP Alliance Offers Resources and Assistance

By Jane Johnson, DVM



Need another Hazard Analysis and Critical Control Point (HACCP) resource? If so, you might want to check out the International HACCP Alliance.

The International HACCP Alliance was developed on March 25, 1994, to “provide a uniform program to assure safer meat and poultry products.” Housed within the Department of Animal Science at Texas A&M University in College Station, Texas, the Alliance includes industry associations, professional organizations, educational foundations, universities, third-party private companies, and government cooperators.

The Alliance’s Web site, www.haccpalliance.org/sub/index.html, is divided into six tabbed sections:

- Hot Topics – provides information regarding topics of current interest;
- Training Activities – provides a list of HACCP courses, a list of accredited course providers, and information regarding Alliance-approved curricula;
- Food Safety Information – provides links to information regarding food safety and HACCP
 - » Reference document titled “Antimicrobial Interventions for Beef”
 - » Section titled “HACCP and Food Safety,” which provides links to various information including compliance guidance materials, applicable FSIS

Notices, HACCP questions and answers, critical control point decision tree, etc.

- » Section titled “Reference Corner,” featuring links to Title 9 of the *Code of Federal Regulations* (CFR), various government agency Web sites, the USDA National Agricultural Library, and various association Web sites;

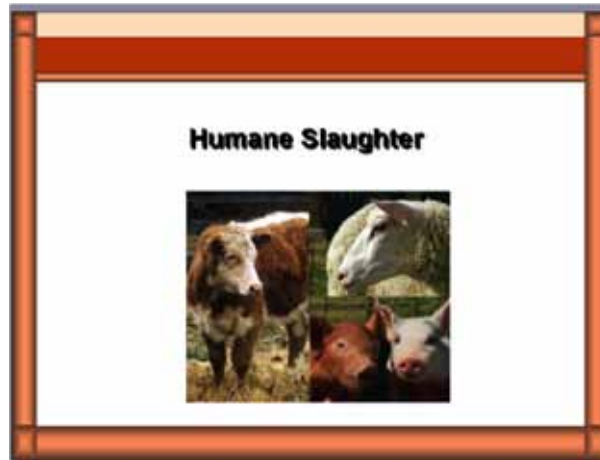
- News – provides links to news items about the Alliance and the food industry;
- Alliance Board Room – provides information about members of the Alliance’s Board of Directors and lists the Alliance’s members; and
- Scientific Article Database – provides a searchable database of scientific articles on various topics. When you conduct a search, the database will return the title of an article (or articles) matching your keyword search, the author, the name of the publication containing the article, the publication’s volume/issue number and date, and the article’s page number.

For more information, you can contact the Alliance by email at kharris@tamu.edu. If you prefer, you may phone the Alliance at (979) 862-3643 or send a fax to (979) 862-3075. You may also write to the following address:

International HACCP Alliance
120 Rosenthal Center, 2471 TAMU
College Station, TX 77843-2471

Take Advantage of Available Training Modules

By Jane Johnson, DVM



As you know, humane handling is a very important issue for both FSIS and you, the small or very small slaughter plant owner or operator. Therefore, FSIS has posted its “Humane Handling of Livestock” training module on its Web site at www.fsis.usda.gov/FSIS_Employees/Regional_Training/index.asp for use by plant owners or operators. This is one of the modules used by FSIS to train its inspection program personnel.

In addition, FSIS has developed practical, situation-based training for inspection program personnel that prepares them for realistic scenarios they may face at a slaughter plant. There is a “Situation-Based Humane Handling Training Facilitator Guide” and a “Situation-

Based Humane Handling Training Participant Guide.” These can also be found at www.fsis.usda.gov/FSIS_Employees/Regional_Training/index.asp.

These training modules have been made available to plant owners and operators because the information they contain may be helpful in your understanding of how the Agency enforces the humane handling regulations. In addition, you may find the information and training method useful in training your own employees on humane handling.

For questions or more information on humane handling, please contact the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or email InfoSource@fsis.usda.gov.

Commonly Asked Questions & Answers

Q. Are inspection program personnel required to collect animal identification when a tissue sample is collected for pathology testing?

A. Yes. According to 9 CFR 310.2 (a), all animal identification is to be retained with the animal until the post-mortem examination is completed. When a pathology sample is collected in an official slaughter establishment, FSIS inspection program personnel must follow the instructions in accordance with FSIS Directive 10230.6, titled “Submitting Tissue Specimens for Pathological or Diagnostic Microbiological Evaluation to the Laboratory.” In addition, they are to collect all identification

from animals selected for the sampling. Types of animal identification include, but are not limited to, livestock market or sale barn back tags, producer ear tags, feedlot identification tags, Canadian tags, vaccination tags, calf-hood (bang) tags, tattoos, and brands. In addition, FSIS inspection program personnel must request information on the producer/owner name and address of the animal selected for sampling from the establishment.

The identification information must be maintained with the carcass and/or laboratory form number until all laboratory tests are performed according to 9 CFR 310.2 (b)(5)(ii) to allow for trace back, if the laboratory results indicate a trace back is necessary.