

MOBILE SLAUGHTERHOUSE COMPLIANCE GUIDE¹

Definition

Mobile slaughter unit: A mobile slaughter unit (MSU) is a self-contained slaughter facility that can travel from site to site.

Purpose

This guideline is intended for owners and managers of a new or existing red meat or poultry MSU who want their establishment to come under Federal inspection and continue operations in accordance with Food Safety and Inspection Service (FSIS) regulations. MSU operators are subject to the same regulatory requirements that apply to a fixed (“brick and mortar”) facility. This guideline includes the procedures necessary to receive a Federal grant of inspection, unique concerns that may arise with mobile slaughter units, and links to review regulatory requirements and resources.

Advantageous of Mobile Slaughter

The meat and poultry industries have become increasingly consolidated, while consumer interest in locally grown and specialty products has continued to expand. The industry consolidation has resulted in a lack of U.S. Department of Agriculture (USDA) or State-inspected establishments available to small producers of livestock and poultry in some remote or sparsely populated areas. These small producers often serve the needs of their community and the growing demand for forage-fed, natural, and organic meat and poultry products. MSUs can serve multiple small producers in areas where slaughter services might be unaffordable or otherwise unavailable. Therefore MSUs can help small producers meet this demand, expand their businesses and create wealth in rural communities.

The advantages of a MSU versus a fixed structure include lower processing costs, reduced stress on animals, lower capital investment, and less resistance from municipalities and neighbors.

What is Needed to Operate a MSU under Federal Inspection

A. Grant of Inspection

Contact the District Office (DO) that has jurisdiction over the geographic area in which you will primarily operate the MSU. The DO will send you an information packet and an Application for Federal Meat, Poultry or Import Inspection, FSIS Form 5200-2. A list of DO locations and contact information is available (see http://www.fsis.usda.gov/Contact_Us/Office_Locations_%26_Phone_Numbers/index.asp).

There are seven basic steps required for obtaining Federal meat and poultry inspection in the Federal Grant of Inspection Guide (see <http://www.fsis.usda.gov/Regulations&Policies/GrantofInspectionGuideline/index.asp>).

¹ Mobile Slaughterhouse Compliance Guide,
http://www.google.com/url?sa=t&source=web&cd=1&sqi=2&ved=0CBYQFjAA&url=http%3A%2F%2Fwww.fsis.usda.gov%2FPDF%2FCCompliance_Guide_Mobile_Slaughter.pdf&ei=THFhTeL1EYS-sQPHn_ShAw&usg=AFQjCNE7ZVxF8E0JFu4EBryJ00y-OXR2wA

By clicking on each bullet heading under the Steps Required for Obtaining Federal Meat and Poultry Inspection, you will see a detailed description of each step, including regulatory citations, forms, and sample forms.

The steps are:

- 1) File an Application for Inspection
- 2) Facilities Must Meet Regulatory Performance Standards
- 3) Obtain Approved Labels or Brands
- 4) Obtain Approved Water Source Letter
- 5) Obtain Approved Sewage System Letter
- 6) Provide a Written Standard Operating Procedure for Sanitation
- 7) Provide a Written Hazard Analysis and HACCP Plan

Only the application for a Federal grant of inspection is to be submitted to the DO. All other documents relative to the above list are to be maintained on file at the facility and made available for review by inspection program personnel (IPP) upon request. DO representatives are available to assist you with the application process and to answer any additional questions you might have concerning regulatory requirements.

Upon receipt of your application and completion of all preliminary items, a designee of the DO will review the MSU. If all documentation and the facility comply with regulatory requirements, then a conditional grant of inspection will be issued to allow you 90 days to validate your HACCP program.

Operating in Several Districts:

For a MSU that will operate in more than one district, the owner is to first file an application for inspection in the Headquarters district in which the unit will primarily operate. The Headquarters DO will assign the primary establishment number (e.g. Est. 00). A separate application is then sent by the MSU owner to each additional district in which operations will be conducted. The remaining districts will use the same establishment number, but with an additional alphabetical suffix (e.g. 00 A, 00 B, etc.) that identifies the establishment when it operates within that specific district. Plant profiles in each district will record that the MSU is “doing business as” 00, 00 A, 00 B.

The Headquarters DO may designate a liaison or case specialist to coordinate information sharing between districts regarding MSU activities and regulatory compliance trends. This will also facilitate food safety assessments which will be the primary responsibility of the Headquarters DO. (A food safety assessment considers all food safety aspects that relate to an establishment and its environment, the nature and source of all materials received, and the plant’s processes and products.)

The grant holder is to ensure that IPP have access to the MSU at all times whenever a request for access is made, in accordance with the Federal Meat Inspection Act, Sec. 606 (“access at all times, day or night, whether the establishment be operating or not”) and the Poultry Products Inspection Act, Sec. 11 (“access to their places of business and opportunities to examine...”).

Scheduling:

Every time the MSU moves to a different location, and before conducting any slaughter operations, the respective DO with oversight of that location will be notified by the MSU operator. FSIS realizes that ordinary schedules described in the regulations may not be applicable to most MSUs. However, the MSU operator needs to provide to any district in which he or she will operate a schedule of days and hours of operation in accordance with Title 9 of the Code of Federal Regulations (9 CFR) 307.4(d)(1) for meat or 381.37(d)(1) for poultry. The operations schedule needs to be provided as much in advance as possible, allowing adequate time for the DO to arrange staffing and inspection procedure schedules necessary for FSIS services. At least two to four weeks advance notice is recommended, depending upon the degree of predictability and consistency of MSU operations. The submitted work schedule is to specify the daily clock hours of operations and lunch periods. Any changes in the schedule must be approved by the DO.

If the MSU will operate on a seasonal basis only, the dates of operation are to be specified for the DO. Voluntary suspension of operations to cover temporary inactive periods not to exceed 120 calendar days can be requested in writing through DO channels.

NOTE: The staffing of mobile slaughter units may present a challenge to FSIS. It may be difficult for the Agency to find personnel to provide inspection at the location at which a unit intends to operate.

Thus, communication with the DO by the operator of the mobile unit is particularly important.

B. Sanitation Requirements

Meat and poultry establishments with a grant of inspection from FSIS are to conduct operations under all of the provisions of 9 CFR Part 416--Sanitation (see A detailed explanation of the sanitation regulations, including methods already proven to meet the regulatory requirements, is in the Sanitation Performance Standards Compliance Guide (see <http://www.fsis.usda.gov/Regulations & Policies/Sanitation Performance Standards/index.asp>).

1. Sanitation Performance and Unique Considerations for MSUs

a. Water

In order to receive a grant of inspection all Federal establishments must provide FSIS personnel with documentation certifying that the supply of water, no matter what the source, complies with the National Primary Drinking water regulations (40 CFR Part 1410). The MSU may operate at a location where it can directly utilize either a municipal water supply or private well water. Alternatively, it is permissible to transport water in a tank to the slaughter location as long as there is a water report certifying the potability of the water source. This documentation needs to be made available for FSIS

review at all operational locations before initiating slaughter activities at that specific site. For a private well, this documentation is to be renewed semiannually for any recurring slaughter location (e.g., a specific ranch or farm where the MSU operates at various times throughout the year). Some MSUs will be working in conjunction with a FSIS inspected (official) fabrication facility where they obtain their water. In all cases, the availability of documentation certifying that water sources are potable is a continuing requirement. Water supply requirements are covered in the sanitation regulations in 9 CFR 416.2(g)(1). IPP will verify that the MSU meets these requirements in accordance with FSIS Directive 5000.1(see <http://www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/5000.1Rev3.pdf>).

b. Sewage and Waste Water Disposal

The MSU operator is to provide FSIS with a letter of approval from the local health authority for any specific slaughter site. A MSU will usually not have traditional sewage facilities unless there is access to a private septic system provided at the slaughter location. Some MSUs may have a holding tank and will haul waste water for discharge at a MSU docking station. Alternatively, waste water disposal might be adapted for the specific situation. For example, blood and waste water might be dispersed on the producer's property well away from any stream or drainage, provided the local health authority permits this. In any case, the MSU operator is to provide a letter from the local health authority relating to waste water handling at any specific operational site. This is required to obtain and uphold terms of the grant.

c. Grounds and Facilities

The walls, floors, and ceilings of the MSU are to be built of durable materials impervious to moisture which can be cleaned and sanitized as necessary to prevent product adulteration or creation of insanitary conditions (9 CFR 416.2(b)(1and 2)). Adequate heat and insulation will help prevent freezing of water pipes during cold weather operation.

The operator is to maintain the MSU and implement a program to prevent harborage or entry of pests. Methods to prevent pest entry could include: 1) Keep doors and windows closed as much as possible. 2) Use high output fans to prevent entry of flying insects. 3) Spray and bait for flies prior to the day of slaughter. 4) Apply a spray-on surfactant or a mixture of water and mineral oil to the hide of livestock before skinning to reduce the risk of flies contaminating edible product. 5) Control of rodents around docking stations or any other operational areas, and where the MSU will be stored during non-operational hours.

Pest control substances must be approved by the Environmental Protection Agency (EPA) for use in food processing environments and be used in a manner that does not adulterate product or create insanitary conditions. Under the Federal Insecticide, Fungicide, and

Rodenticide Act (FIFRA), EPA reviews pesticide formulation, intended use, and other information; registers all pesticides for use in the United States; and prescribes labeling, use, and other regulatory requirements to prevent unreasonable adverse effects on the environment, including humans, wildlife, plants, and property. Any meat or poultry establishment using a pesticide must follow the FIFRA requirements.

The grounds immediately surrounding the MSU operational site are to be maintained to prevent creation of insanitary conditions that could lead to adulteration of product. Positioning the MSU on a well-draining concrete or gravel pad can be helpful for controlling manure, mud, pooling water, and other sanitation problems. Bleeding animals on a sloped concrete pad equipped with lines to a drain field is recommended, or alternatively, a gravel bed can allow blood and water to drain and prevent pooling. The position of doors into the MSU should be considered relative to prevailing winds to help control airborne dust, agricultural chemicals, or odors associated with the operational site. If a combustion engine generator is used as a power source for the MSU, then exhaust emissions should not create odors which affect sanitary operation of the MSU.

Adequate ventilation in the small space of a MSU is of utmost importance to control odors, vapors, and condensation to prevent adulteration of product (9 CFR 416.2(d)).

d. Sanitary Facilities and Office Accommodations for Inspection Personnel

Hand washing and toilet facilities are required for IPP and MSU employees (9 CFR 416.2(h)(1-2)). While these provisions may not be located inside the MSU, they should be available within a “reasonable” distance. For example, portable toilets and hand sanitizer outside the MSU with hand washing facilities available inside the unit would be considered reasonable accommodations. Some MSUs will operate on the producer’s property and farm toilet facilities may suffice if within a reasonable distance. Other MSUs may operate in close proximity to a public building, or an associated official fabrication facility, where these accommodations are located. In all cases, the DO will determine what constitutes “reasonable” accommodations.

Inspectors need not have an official office within a MSU if it operates as part of a combination or patrol assignment. Alternatively, the USDA inspector may have access to an office in an associated official fabrication facility. Any other arrangements for the equivalent of office space and required facilities in accordance with 9 CFR 307.1 and .2, or 381.36, are acceptable if approved by a designee of the DO. However, it is recommended that the MSU provide a desk with adequate lighting, chair, cooler or refrigerator space for storing laboratory samples (e.g., residue or microbiological specimens) collected by IPP, and a cabinet that can be padlocked for storing

USDA brands and official documents. The DO will determine the logistics on a case-by-case basis for IPP phone communications (e.g., use of cell phones) as well as arrangements for FSIS shipment of laboratory samples (either directly from the MSU operational site or by means of inspector transport of samples to a central package pick-up location).

2. Sanitation Standard Operating Procedures (Sanitation SOPs)

A federally inspected MSU is to comply with 9 CFR 416.11 and 416.12 requiring establishments to develop, implement, and maintain written standard operating procedures for sanitation. All recordkeeping requirements of 9 CFR 416.16 apply to a MSU. Records are to be kept in the MSU and made available to IPP upon request.

Additional information regarding Sanitation SOPs is available through Commonly Asked Questions from Small and Very Small Plants on Sanitation Standard Operating Procedures (see <http://www.fsis.usda.gov/Help/FAQsSSOP3/index.asp>).

C. Hazard Analysis and Critical Control Point (HACCP) Systems

A written hazard analysis and slaughter HACCP plan tailored to your MSU will need to be developed by an individual trained in HACCP principles before you will be granted Federal inspection (9 CFR 304.3(b) or 381.22(b)), and thereafter you will need to implement and maintain them in order to continue operations.

A hazard analysis is the process used to determine the food safety hazards reasonably likely to occur in the production process and to identify the measures that the establishment can apply to control those hazards. Whenever a hazard analysis identifies a food safety hazard that is reasonably likely to occur, a written HACCP plan must be developed. Typical slaughter hazards might include, but are not limited to: 1) Control of feces, ingesta, or milk contamination; 2) Disease-producing microorganisms (*E. coli* O157:H7; *Salmonella*); and 3) Chemical, pesticide, or drug residues.

Chilling and cold storage of product may occur within the MSU or in an associated fabrication facility, depending upon hazard analysis decisions. The MSU operator is not restricted to producing only whole or partial carcasses, but any further processing activities are to be included in the HACCP plan and associated supporting documents. Additionally, all 9 CFR 417.5 recordkeeping requirements apply to a MSU.

The hazard analysis and HACCP plan for a MSU need not be overly complicated. However, a MSU operator may want to utilize an outside consultant who is not employed by the establishment to develop its food safety system. The FSIS Outreach office (see <http://www.fsis.usda.gov/AboutFSIS/OOEET/index.asp>) can provide information on HACCP workshops, as well as a self-study guide and video. They can also assist in directing you to contacts for the Small Business Regulatory Enforcement Fairness Act (SBREFA). Additionally, each State assigns HACCP Coordinators to assist establishments with the development of

HACCP programs (see http://www.fsis.usda.gov/contact_us/state_haccp_contacts&coordinators/index.asp).

D. Slaughter Regulatory Concerns

1. Meat (Livestock)—MSU operators are to comply with all livestock slaughter regulations described in 9 CFR Parts 307 through 314. This includes microbiological testing requirements such as generic *E. coli* testing (9 CFR 310.25(a)). Humane Slaughter of Livestock is addressed in 9 CFR Part 313. FSIS recommends that slaughter facilities, including MSUs, use a systematic approach to humane slaughter, with a focus on treating livestock in a way that includes minimizing excitement, discomfort, and accidental injury when unloading or driving animals. The MSU operator is responsible for meeting all regulatory requirements for humane slaughter of livestock and should carefully consider the design of any holding pens, driveways, and ramps available at any specific operational site, as well as the methods used to adequately restrain animals and produce immediate insensibility upon stunning. In most circumstances, if a firearm is used then the head cannot be saved for edible product, except for the tongue.

FSIS authority for enforcing humane handling requirements commences when animals begin being handled by either the MSU operator or livestock owner as they are staged for slaughter. FSIS Directives 6900.1 and 6900.2 contain additional information on humane handling (see <http://www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/6900.1Rev1.pdf> <http://www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/6900.2Rev1.pdf>).

Each MSU operational site is to provide an ante-mortem pen for IPP to observe live animals at rest and in motion, as well as a holding pen for animals designated as U.S. Suspects. Any diseased or disabled animals requiring further inspection are to be provided a covered pen sufficient to protect them from adverse weather conditions.

Livestock carcasses of varying species, or custom slaughtered carcasses held and transported in the MSU, are to have adequate separation or protective wraps in order to minimize potential cross-contamination caused by carcass-to-carcass contact. Inedible articles are to be denatured and handled in accordance with 9 CFR 325.11 and 325.13.

2. Poultry—MSU operators are to comply with all poultry slaughter regulations in 9 CFR Part 381, including slaughter in accordance with good commercial practices as described in 9 CFR 381.65(b). Generic *E. coli* testing requirements apply in accordance with 9 CFR 381.94(a). Inedible articles are to be denatured and handled in accordance with 9 CFR 381.95 and 381.193.
3. Special labeling claims (such as “all natural”) for meat and poultry products require prior-approval by the Labeling and Policy Development Division (LPDD) (ph: 301-504-0878, FAX: 301-504-0873). You are to submit to this office a copy of the label plus supporting documentation or statements to substantiate any special claims. Links are included in the www.fsis.usda.gov Website for: *Animal Raising Claims, Natural and Organic Claims*, and

“Certified Organic”. (see http://www.fsis.usda.gov/Regulations & Policies/claims_guidance/index.asp).

4. Proper carcass and offal disposal may be accomplished in a variety of ways. Please contact your local health regulatory authority for more information about alternatives in your area. For example, denatured meat or poultry offal might be allowed to remain on the farm to be composted for use as a soil amendment when permitted by local regulations. Many producers prefer this practice because soil nutrients will be increased, and the higher cost of rendering will be avoided.
5. If FSIS retained product held for further examination is to be transported in the MSU to an official facility for a Public Health Veterinarian’s determination of product disposition, then the establishment needs to obtain FSIS approval of the means used to secure the carcass and parts in accordance with 9 CFR 307.2(h) and 310.3, or 381.77.
6. Exotic animals (e.g., bison, elk) or poultry (e.g., migratory waterfowl, game birds) slaughtered under voluntary Federal inspection are to comply with 9 CFR Part 352 or Part 362, respectively.

E. Additional Information

The Niche Meat Processor Assistance Network, sponsored in part by USDA’s Rural Development Agency and the Cooperative State Research, Education, and Extension Service (CSREES) provides additional helpful information about designing a unit, workforce management issues, and other non-regulatory information (see [http://www.extension.org/pages/MobileSlaughter/Processing Units](http://www.extension.org/pages/MobileSlaughter/Processing_Units)).