

## **OBTAINING FEDERAL MEAT AND POULTRY INSPECTION<sup>1,2</sup>** ***Background and Introduction to the 7 Basic Steps Required***

### **Overview**

The United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) is responsible for inspecting meat, poultry, and processed egg products for safety, wholesomeness and proper labeling. Federal inspection personnel are present at all times in virtually all slaughter and egg processing plants and for at least part of each day in establishments that further process meat and poultry products.

Meat inspection became law under the Federal Meat Inspection Act of 1906, which requires inspection of red meat products sold in interstate and foreign commerce. The Act established strict sanitation requirements for plants and calls for examination of all labels for truthfulness and accuracy. In 1968, the Poultry Products Inspection Act extended the same provisions to poultry inspection. Under the Meat and Poultry Acts, FSIS inspects all meat and poultry sold in interstate commerce.

Federal inspection assures the consumer that meat, poultry and egg products are clean, safe, and wholesome for human consumption at the time of purchase. This involves inspection of the live animal, carcass, internal organs, plant facilities, equipment, personnel and transportation system.

In 1996, FSIS issued the Pathogen Reduction/Hazard Analysis Critical Control Point (HACCP) final rule. As the name implies, there are two components to the 1996 rule: the reduction of pathogens and the development and implementation of HACCP systems. Today, all federally inspected meat and poultry establishments are operating under a HACCP system and all new establishments must have a HACCP inspected meat system developed before receiving a grant of inspection. HACCP allows establishments to identify food safety hazards that are reasonably likely to occur in the process or type of product being produced and establish points of control to prevent adulteration from occurring. FSIS inspection personnel verify that an establishment has developed and is implementing the HACCP system as designed.

The HACCP final rule also requires the development and implementation of Sanitation Standard Operating Procedures (SSOPs). These programs are intended to prevent direct product contamination or adulteration, and focus on pre-operational and operational activities. Every establishment must develop, implement, and maintain effective SSOPs. FSIS has developed generic HACCP and SSOP plans to aid prospective applicants in developing these required components.

The inspection process starts with the live animal. Ante-mortem inspection involves a visual and physical evaluation of the live animal prior to slaughter to identify any conditions that may indicate disease or illness. Humane handling is also a primary concern. Strict guidelines are in place and are strongly enforced to prevent the mishandling of animals. FSIS inspection personnel are responsible for conducting a thorough examination of all slaughtered animals. The Post mortem inspection allows inspection personnel to further evaluate the health of carcass and tissues.

The inspection system continues throughout the entire processing segment of the industry, including both raw and fully cooked products. Inspection personnel are responsible for verifying that an establishment is maintaining sanitary conditions and following all food safety related procedures and labeling regulations.

Meat, poultry and egg production are the most highly regulated food industries<sup>3</sup>. FSIS is responsible for developing rules and regulations for the production of wholesome and safe foods and providing regulatory oversight during the day-to-day production of these products.

The combination of regulatory oversight and the commitment and dedication of the plant operator allows consumers to purchase and prepare meat and poultry products with confidence in the safety of these products. Food safety begins with the establishment, follows with regulatory verification, and ends with the consumer.

---

<sup>1</sup> Small/Very Small Plant Guide: *Applying for a Federal Grant of Inspection For Meat and Poultry Establishments*, United States Department of Agriculture, [http://www.fsis.usda.gov/PDF/Guidelines\\_for\\_Obtaining\\_Federal\\_Grant\\_of\\_Inspection.pdf](http://www.fsis.usda.gov/PDF/Guidelines_for_Obtaining_Federal_Grant_of_Inspection.pdf) , September, 2006

<sup>2</sup> Pertinent Code of Federal Regulations (CFR) relating to Animals and Animal Products can be found at [http://www.access.gpo.gov/nara/cfr/waisidx\\_10/9cfrv2\\_10.html#301](http://www.access.gpo.gov/nara/cfr/waisidx_10/9cfrv2_10.html#301)

<sup>3</sup> Recent contaminated egg products from Iowa producers call this claim regarding poultry and egg production into question.

## INTRODUCTION TO THE 7 BASIC STEPS REQUIRED FOR OBTAINING FEDERAL MEAT AND POULTRY INSPECTION

Upon receipt of your application and completion of all items, the Food Safety and Inspection Service (FSIS) District Manager or designee will conduct a review of the establishment. If all is found acceptable, a Conditional Grant of Inspection will be issued to allow you 90 days to produce and validate your HACCP Program.

### **Step 1—File an Application for Inspection**

Complete application (FSIS Form 5200.2). Mail completed application to the appropriate District Office, who will have Federal jurisdiction over the operation of your plant. Your local Frontline Supervisor or designee can assist you, if you have any questions.

In addition to completing the application, pay particular attention to item 106. “Attach a Description of the Limits of the Establishment Premises that is to be under Federal Inspection.” This can be a written description or a drawing. If a drawing, place a North compass heading on the drawing.

*Special note of instruction:*

- Complete all of the sections and numbered items. If an item is not applicable enter “N/A” or none. If blocks 23 and 24 are not applicable, you must write “None.” N/A is not acceptable.
- Item 25—You must develop a written Sanitation Standard Operating Procedure (SSOP) for the Establishment. (See Step 6—“Standard Operating Procedures for Sanitation.”)

### **Step 2—Facilities Must Meet Regulatory Performance Standards**

Establishments that conduct operations under a Grant of Inspection from USDA’s Food Safety and Inspection Service must conduct operations under the Provisions of Part 416. These requirements include the following Regulations—416.2(a) (b) (c) (d) (e) (f) (g) (h) and Regulation 416.3.

### **Step 3—Obtain Approved Labels and/or Brands**

After an application for inspection has been filed, an official plant number will be reserved upon request by the applicant. This number is used to identify all inspected and passed products prepared in the establishment. All carcasses from slaughtered animals must be ink-branded with the U.S. Inspection legend, which includes the plant number. All packaged meat products must have the U.S. Inspection legend, with the plant’s number printed on the label of the package. All labeling material must be federally approved and on-hand before inspection will be granted. (Form 7234, for additional information see CFR Parts 316, 317, [http://www.access.gpo.gov/nara/cfr/waisidx\\_07/9cfr316\\_07.html](http://www.access.gpo.gov/nara/cfr/waisidx_07/9cfr316_07.html) & 381.96 thru 381.144 [http://www.access.gpo.gov/nara/cfr/waisidx\\_07/9cfr381\\_07.html](http://www.access.gpo.gov/nara/cfr/waisidx_07/9cfr381_07.html))

### **Step 4—Obtain Approved Water Source Letter**

If the water entering an establishment is supplied by a Municipal water supply system (i.e. city, county, or other public water system) the letter is issued by the Municipality, or the State Public Health Service or its county office. If the water is from a private water supply (such as a private well), the letter must be issued by the State Public Health Service or the appropriate county office. The letter should identify the source, state that the source is approved, and that the water is potable and meets tests prescribed by the Environmental Protection Agency in its “Drinking Water Standards.” In addition to the water approval letter, a current acceptable water laboratory sample report (water potability certification) must be on file before inspection is granted.

**NOTE:** If the water is supplied from private wells, the letter must state that the wells are on the premises of the establishment and are effectively protected from pollution.

### **Step 5—Obtain Approved Sewage System Letter**

State or Local health authorities can provide a letter stating that the plant’s sewage system is acceptable. If State and Local authorities certify the water source, they may certify the sewage system in the same letter.

### **Step 6—Provide a Written Standard Operating Procedure for Sanitation**

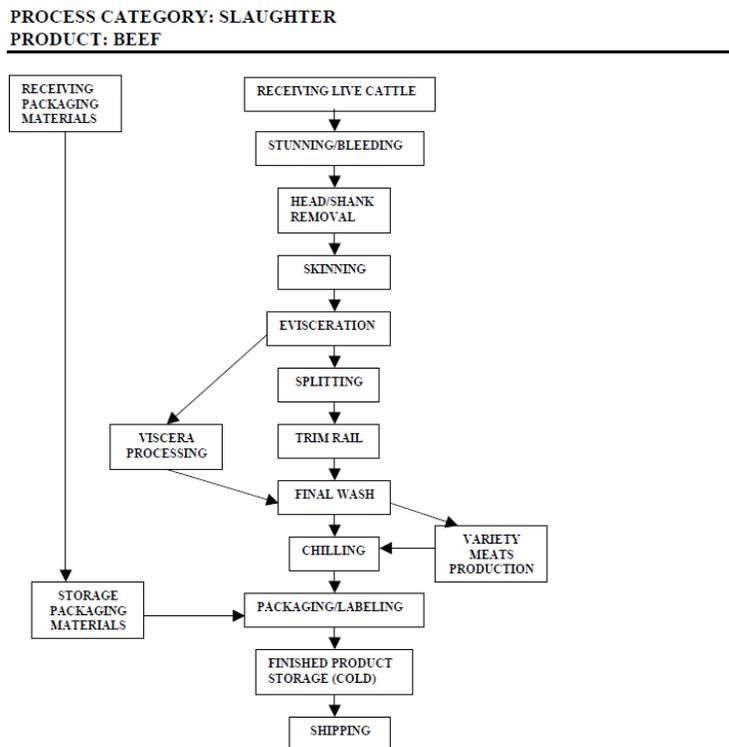
A written Standard Operating Procedures for Sanitation (Sanitation SOPs) tailored to each plant will need to be developed before being granted Federal Inspection. (See CFR parts 304.3(a), 416.11 – 416.17)

### Step 7—Provide a Written Hazard Analysis and HACCP Plan<sup>4</sup>

The Hazard Analysis Critical Control Point (HACCP) system is a scientific approach to process control. It is designed to prevent the occurrence of problems by assuring that controls are applied at any point in a food production system where hazardous or critical situations could occur. Hazards include biological, chemical, or physical contamination of food products. Whenever a hazard analysis identifies that one or more food safety hazards are reasonably likely to occur, a written HACCP plan shall be developed.

**Note:** You may utilize an outside consultant who is not employed by the establishment. Questions about the use of consultants may be answered by an FSIS representative. Workshops are being conducted around the country and a self-study guide and video can be provided by USDA Outreach Program. Each State is also assigned a HACCP Coordinator to assist plants with the development of HACCP Programs. (see CFR parts 304.3(b) and (c) and 417)

The following is an example of a **PROCESS FLOW DIAGRAM** for the cattle slaughter process in generic establishment X.



**Process Flow Diagram for the Cattle Slaughter Process (Generic)**

Once the company HACCP team in your establishment has prepared your Process Flow Diagram, they should verify it by walking through the establishment following the flow of product and making sure that all the steps of the process are included in the flow diagram. The team should also review the information provided on the Product Description to make sure all the key facts are included, such as identifying consumers, especially those with particular health problems or known to be at risk.

**Note:** If you are slaughtering cattle and your process includes steps not included in this example, such as pre-evisceration spray, those steps should be added. Also, if your process does not include all the steps identified in this example, those steps would be omitted when conducting the hazard analysis. That is generally, how you use these generic model examples—just omit the features which do not apply to your operation or if your operation includes features not included in this example, they should be added.

By completing a Process Flow Diagram and a Product Description, you have met the requirements of 417.2(a)(2). You can use the Process Flow Diagram in particular to help you complete the rest of the hazard analysis. Use the

<sup>4</sup> For a more detailed and thorough set of instructions, see “Guidebook for the Preparation of HACCP Plans and the Generic HACCP Models,” United States Department of Agriculture, Food Safety and Inspection Service, <http://www.fsis.usda.gov/index.htm>, September 1999 HACCP-13

flow diagram to systematically review each step in the process and ask the question, "Is there a food safety hazard which is reasonably likely to occur which may be introduced at this step?" In answering the question, your HACCP team needs to consider biological (including microbiological), chemical and physical hazards.

### Hazard Analysis

Once the product(s) are accurately described through the flow diagram and product description, the HACCP team should begin work on the **HAZARD ANALYSIS**. The hazard analysis is fundamental to developing a good HACCP plan and one that meets regulatory requirements. The regulatory requirements for a hazard analysis are found at 41 7.2(a).

When the HACCP team has completed their hazard analysis, it is a good idea to review the flow diagram, the product description and the hazard analysis itself to make sure they are complete. Part 41 7.2(a)(3) includes a list of sources from which food safety hazards might be expected to arise. Reviewing that list could help the HACCP team check for completeness.

### Developing Your HACCP Plan

The company HACCP team can now take the materials it developed while doing the hazard analysis and use them to build the **HACCP Plan**. Part 417.2 (c) and (d) are the regulatory requirements:

- (c) The contents of the HACCP plan. The HACCP plan shall, at a minimum:
- (1) List the food safety hazards identified in accordance with paragraph (a) of this section, which must be controlled for each process.
  - (2) List the critical control points for each of the identified food safety hazards, including, as appropriate:
    - (i) Critical control points designed to control food safety hazards that could be introduced in the establishment, and
    - (ii) Critical control points designed to control food safety hazards introduced outside the establishment, including food safety hazards that occur before, during, and after entry into the establishment;
  - (3) List the critical limits that must be met at each of the critical control points. Critical limits shall, at a minimum, be designed to ensure that applicable targets or performance standards established by FSIS, and any other requirement set forth in this chapter pertaining to the specific process or product, are met;
  - (4) List the procedures, and the frequency with which those procedures will be performed, that will be used to monitor each of the critical control points to ensure compliance with the critical limits; Include all corrective actions that have been developed in accordance with §417.3(a) of this part, to be followed in response to any deviation from a critical limit at a critical control point; and
  - (5) Provide for a recordkeeping system that documents the monitoring of the critical control points. The records shall contain the actual values and observations obtained during monitoring.
  - (6) List the verification procedures, and the frequency with which those procedures will be performed, that the establishment will use in accordance with § 417.4 of this part.
- (d) Signing and dating the HACCP plan. (1) The HACCP plan shall be signed and dated by the responsible establishment individual. This signature shall signify that the establishment accepts and will implement the HACCP plan.
- (7) The HACCP plan shall be dated and signed:
- (i) Upon initial acceptance;
  - (ii) Upon any modification; and
  - (iii) At least annually, upon reassessment, as required under § 41 7.4(a)(3) of this part.

### Identifying CCPs

Part 417.2(c)(1) and (2) require that the food safety hazards identified in the hazard analysis be listed on the HACCP plan and that there be a CCP for each identified hazard.

### Verification

There are different three types of verification and 9 CFR part 417.4(a)(2) included specific regulatory requirements for each. The regulatory requirements for ongoing verification are:

- (2) Ongoing verification activities. Ongoing verification activities include, but are not limited to:
- (i) The calibration of process-monitoring instruments;

- (ii) *Direct observations of monitoring activities and corrective actions; and*
- (iii) *The review of records generated and maintained in accordance with §41 7.5(a)(3) of this part.*

### Records

Regulatory requirements are listed in 9 CFR part 4 17.5(a) and (b):

#### **§ 417.5 Records.**

(a) *The establishment shall maintain the following records documenting the establishment's HACCP plan:*

- (1) *The written hazard analysis prescribed in § 417.2(a) of this part, including all supporting documentation;*
- (2) *The written HACCP plan, including decision making documents associated with the selection and development of CCPs and critical limits, and documents supporting both the monitoring and verification procedures selected and the frequency of those procedures.*
- (3) *Records documenting the monitoring of CCPs and their critical limits, including the recording of actual times, temperatures, or other quantifiable values, as prescribed in the establishment's HACCP plan; the calibration of process-monitoring instruments; corrective actions, including all actions taken in response to a deviation; verification procedures and results; product code(s), product name or identity, or slaughter production lot. Each of these records shall include the date the record was made.*

(b) *Each entry on a record maintained under the HACCP plan shall be made at the time the specific event occurs and include the date and time recorded, and shall be signed or initialed by the establishment employee making the entry.*

### Corrective Actions

The Corrective Actions Log is used to create the records of any corrective actions taken because of deviations from critical limits at CCPs. The regulatory requirements for planned corrective actions are found at 9 CFR 417.3(a):

#### **§ 417.3 Corrective actions.**

(a) *The written HACCP plan shall identify the corrective action to be followed in response to a deviation from a critical limit. The HACCP plan shall describe the corrective action to be taken, and assign responsibility for taking corrective action, to ensure:*

- (1) *The cause of the deviation is identified and eliminated;*
- (2) *The CCP will be under control after the corrective action is taken;*
- (3) *Measures to prevent recurrence are established; and*
- (4) *No product that is injurious to health or otherwise adulterated as a result of the deviation enters commerce.*

### Preparation completed

At this point the HACCP team has now completed preparation of the documents which are necessary to meet regulatory requirements for a Hazard Analysis and a HACCP Plan for their cattle slaughter production process. They have secured a copy of FSIS Directive 5000.1, Enforcement of Regulatory Requirements in Establishments Subject to HACCP System Requirements, the HACCP Basic Compliance Checklist which will be used by inspection program personnel. The HACCP team also has modified the inspection form to make the statements into positives, and now has a checklist for its own use to make sure they have not omitted anything in their plan development and preparation. When they are confident that they have done what is necessary, they will turn their Hazard Analysis and HACCP Plan over to the establishment owner for decisions about implementation.

### **General Information**

#### *Separation of Official Establishments*

Each official establishment shall be separate and distinct from any unofficial establishment. Inspection will not be granted in any building in which any part of it is used as living quarters, unless the part for which inspection is requested is separated from such quarters by floors, walls, and ceilings of solid concrete, brick, wood, or similar material, and the floors, walls, and ceilings are without openings that communicate directly or indirectly with any part of a building used as living quarters. (See CFR parts 305.1, 305.2 and 381.26)

#### *Inauguration of Inspection*

Prior to the inauguration of inspection, an examination of the establishment and premises will be made by inspection personnel. (See CFR parts 305.4 and 381.27)

### *Inspection Office*

Office space shall be provided by official establishments, rent free, for the exclusive official of the inspector and other FSIS employees assigned to the establishment. The space set aside for this purpose shall meet with approval of the frontline supervisor. This space should be suitable for the storage of program supplies and for Inspection program personnel to change clothes if such clothes changing facilities are deemed necessary by the frontline supervisor. Laundry service for Inspection program personnel's outer work clothing shall be provided by each establishment. At the discretion of the Administrator, small plants requiring the services of less than one full time inspector need not furnish facilities for FSIS employees as prescribed in this section, where adequate facilities exist in a nearby convenient location. (See CFR parts 307.1, 307.2, 307.3, 381.27 and 381.36(a))

### *Hours of Operation*

The operator of the official establishment shall inform the inspector in charge (IIC) when work in each department has been concluded for the day, and provide the IIC with the day and hour when work will be resumed by the establishment. Whenever any product is to be overhauled or otherwise handled during unusual hours, the establishment operator shall notify the IIC a reasonable time in advance of the day and hour when such work will begin and such product shall not be handled prior to that time. No department, in which operations are being conducted, that requires inspection, will be operated except under the supervision of an FSIS employee. Prior to the initial start of operations, you will be asked to provide a written schedule of the establishment's your hours of operation. The frontline supervisor for your area will contact you for that information. (See CFR parts 307.4 and 381.37)

### *Inspection Charges*

Inspection service is provided free of charge for the first 8 hours per shift consecutive days (Sunday through Saturday). Any work conducted over 8 hour shift, or any time past the initial 5 consecutive day period, will be charged to the plant at the prevailing hourly overtime rate. If the operator of the establishment requests inspection during odd hours, a minimum of 2 hours will be charged to the plant at the above rate. This rate is also charged if the plant works on any Federal holiday. Federal holidays are the first day of January, the third Monday of January, the third Monday of February, the last Monday of May, the fourth day of July, the first Monday of September, the second Monday of October, the eleventh day of November, the fourth Thursday of November, the twenty- fifth day of December and any other day designated as a holiday by Federal statute or Executive Order. When any of the above listed holidays fall on a weekday, that day becomes a holiday. When a holiday falls on a Saturday, the preceding work day (Friday) becomes a holiday. When a holiday falls on a Sunday, the next work day (Monday) becomes a holiday. (See CFR parts 307.5, 307.6, 381.38 and 381.39)

### *Hours of Duty*

The maximum time a slaughter inspector may be assigned daily to a post mortem inspection position is 10 hours per day, and the inspector shall not work more than a total of 12 hours per day. The 10 hour post mortem time, does not include time spent before and after slaughter operations, conducting ante-mortem, sanitation, and offal inspection; supervising disposal of condemned material, and preparing reports. Processing assignments shall not be more than 12 hours per day. Time used for meals is not included in counting the above hours. Lunch periods shall not be less than 30 minutes nor more than one hour. Lunch periods shall begin between the fourth and fifth hour of duty. (See CFR parts 307.4 and 381.37)

### *Withdrawal of Inspection*

Inspection may be withdrawn from an establishment where the sanitary conditions are such that its products are rendered adulterated, or for failure of the operator to destroy condemned products as required by the Act and regulations.

The assignment of inspectors may be temporarily suspended, in whole or in part, to the extent it is determined necessary to avoid impairment of the effective conduct of the program when the operator of any official establishment or any subsidiary therein, or any officer, employee, or agent of any such operator, or agency, threatens to forcibly assault or forcibly assaults, intimidates, or interferes with any FSIS employee in or on account of the performance of his/her official duties.

The inspector in charge can withhold inspection (conditional withdrawal or suspension) and notify the establishment. (See Directive 5220.1<sup>5</sup>)

---

<sup>5</sup> <http://www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/5220-1Rev1.pdf>