
FSIS DIRECTIVE

6210.2

12-19-2002

INSPECTION OF POULTRY FEET

I. PURPOSE

This directive provides instructions to inspection program personnel for performing inspection activities on poultry feet and to help them decide whether the poultry feet are eligible to receive the United States Department of Agriculture (USDA) mark of inspection.

II. CANCELLATIONS

FSIS Notice 59-01, Inspection of Poultry Feet (Paws) dated December 21, 2001

III. [Reserved]

IV. REFERENCES

9 CFR 381.79

V. BACKGROUND

Poultry feet qualify to receive the USDA mark of inspection when their identity is maintained with the carcass through the post-mortem carcass inspection process, and they are found to be not adulterated. Poultry carcasses or feet passed for human food may, in accordance with 9 CFR 381.79, receive the mark of inspection based on an examination of the feet as well as the carcass as a whole.

VI. METHODS FOR PRODUCING FEET ELIGIBLE FOR THE MARK OF INSPECTION

A. Under Inspection System Procedure (ISP) activity code 04C01, inspection program personnel will verify that establishments desiring to produce poultry feet that are eligible to bear the mark of inspection maintain the identity of the feet with the rest of the carcass from which they were derived for post-mortem inspection and disposition purposes by employing one of the following methods:

DISTRIBUTION: Inspection Offices; T/A
Inspectors; Plant Mgt;T/A Plant Mgt;
TRA;ABB;TSC;Import Offices

OPI: OPPD

1. Expose the hock joints, leaving the feet attached to the carcass by a tendon or skin part, provided:

a. the feet do not obstruct the view of the carcass in such a way as to hinder the inspector's ability to perform the established post-mortem inspection procedure.

b. sanitary conditions are maintained.

2. Process detached poultry feet by a **batch method** that ensures that when a single carcass is condemned on postmortem, the correlative batch of feet collected in a separate location is condemned, provided:

a. the batch method procedure to be used is acceptable to the Inspector-in-Charge (IIC). (**NOTE:** Establishments may perform identification and disposition of carcasses affected with systemic conditions before the carcass/feet separation. Such an approach is to be set out in the batch procedure description. Carcasses disposed of by establishment personnel are reported as plant rejects); and

b. the procedure ensures that whenever inspection program personnel condemn a carcass at any post-mortem inspection station, the establishment helper immediately communicates the condemnation to management. In response, management disposes of the batch of poultry feet containing the feet from the condemned carcass.

VII. POST-MORTEM INSPECTION PROCEDURES FOR POULTRY FEET

A. Inspection program personnel are to condemn carcasses, including the feet, that exhibit signs of systemic conditions that may render the carcass and its parts adulterated, e.g. septicemia/toxemia or leukosis complex or localized conditions with evidence of general systemic involvement e.g. inflammatory process (IP) with general systemic disturbance.

B. Inspection program personnel are to pass carcasses, including the feet, with certain defects not requiring condemnation of the entire carcass (localized defects), e.g. localized airsacculitis or bruises. Under any of the regulatory poultry slaughter systems (SIS, NELS, and NTI) except the Traditional Inspection System, localized defects are removed by establishment personnel subject to FSIS verification checks.

VIII. INSPECTION PROGRAM PERSONNEL VERIFICATION RESPONSIBILITIES

Inspection program personnel will examine a random sample of processed or packed feet and verify that the product is wholesome and not adulterated, and that it can bear the mark of inspection. In addition, in establishments choosing to use a batching system, they verify that the establishment is following their batch method procedures. They will also verify that establishments:

- A. are maintaining sanitary conditions at all times during feet processing, chilling, and packaging;
- B. have considered whether there are any food safety hazards that are reasonably likely to occur in the production of feet eligible for the mark of inspection as part of their hazard analysis (see 9 CFR 417.2); and
- C. have a procedure in place to ensure that feet with localized or processing defects that could render the feet adulterated are removed prior to packing. Localized defects include sores, compound fractures, and bruises. Processing defects include extraneous material (specks, smears, attached or unattached cuticle, or toenail) and mutilation (mutilation to the skin or muscle). (NOTE: Localized and processing defects generally are not food safety hazards).

IX. FURTHER GUIDANCE

For technical guidance contact the Technical Service Center. For guidance related to regulatory activities refer questions through supervisory channels.

Philip S. Derfler /s/

Deputy Administrator
Office of Policy and Program
Development