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02/14/95  
OPI: S&T/PPID

DETERMINING ADDED WATER IN FRESH SAUSAGE

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I. PURPOSE

This directive cancels the instructions for routine added water sampling and provides inspection program employees guidance for determining compliance with the added water limitation in fresh sausage.

II. CANCELLATION

MPI Manual, Part 18.23

III. REFERENCES

MPI Regulations, Sections 319.140 and 319.145  
FSIS Directive 7140.2, dated 9/10/90

IV. ABBREVIATIONS

The following will appear as abbreviated in this directive:

ISG Inspection System Guide  
PBIS Performance Based Inspection System

V. BACKGROUND

As mandated by the MPI Regulations, compliance with the added water limitation in fresh sausage should be determined at the time of formulation, rather than during routine sampling of the finished product. Laboratory analysis reflects added water and the moisture content of the meat. With the inception of PBIS, FSIS did not incorporate a new ISG task for the sampling of fresh sausage to determine added water. This was done to stress the Agency's policy of monitoring the added water limitation through formulation verifications.

VI. PROCEDURES

A. As required by the MPI Regulations, FSIS employees monitor the processing of fresh sausage to assure that no adulterated or misbranded products are produced. Inspectors must routinely monitor compliance with the added water limitation set forth in MPI Regulations, Section 319.140, at the time of formulation, as directed through the scheduling of PBIS task code 06A01a2. The routine

sampling of fresh sausage products to determine compliance with the added water limitation as outlined in the MPI Manual, Part 18.23, will now be discontinued.

B. However, in limited situations, when PBIS task code 06A01a2 has not been scheduled or performed for 4-6 weeks, and the added water limitation cannot be determined at time of formulation, the inspector may, after concurrence with his or her immediate supervisor, submit three 1-pound samples for testing, collected randomly from throughout the lot of product.

C. If product is sampled, the inspector should record PBIS task code 11T01a2, Directed Sampling, on FSIS Form 8800-2, Inspector Assignment Schedule.

D. Each of the three samples should be accompanied by a separate FSIS Form 10,600-1, Domestic Chemical Lab Analysis. In Box 21, indicate that the product is suspected of containing excess added water and check the "Added Water" block in item number 25.

E. When sampling product, a lot will be defined as product from 1 day's production, unless the establishment normally conducts more than one shift during a day, in which case a lot is all product from that shift only.

## VII. ACTION LIMITS AND CORRECTIVE ACTION

If product is sampled, the inspector will average the results of the three samples. When the average of the three samples is: 4 percent or more if water is declared; or 1 percent or more if no water is declared, the inspector shall:

A. retain the lot represented by the initial three samples if the lot has not been shipped from the establishment,

B. advise establishment management that the establishment is now under a "Hold and Test Restriction",

C. retain and submit three samples collected randomly throughout the next available lot produced by the establishment,

D. release the retained lot if the average of the three samples is 3 percent or less if water is declared; or 0 percent or less if no water is declared, and

E. continue operating under the "Hold and Test Restriction" until the average of three sample results from three consecutive lots are found to be in compliance. At that time, the inspector shall return to normal monitoring by determining compliance at the time of formulation as directed by the scheduling of PBIS task code 06A01a2.

VIII. FURTHER GUIDANCE

Inspectors should consult their immediate supervisors if further guidance is needed when determining compliance with the added water limitation in fresh sausage.

Margaret OK'Glavin  
Administrator

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