

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

08-12

2/1/12

INSTRUCTIONS FOR VERIFYING ALL STEPS IN THE PROCESSING OF READY-TO-EAT MEAT AND POULTRY PRODUCTS

I. PURPOSE

This notice re-issues the content of FSIS Notice 01-11. FSIS considers it necessary to reissue this information because it provides Inspection Program Personnel (IPP) with important instructions for verifying that establishments that are producing ready-to-eat (RTE) meat and poultry products have considered all hazards and have included all steps in their hazard analysis. In addition, this notice is being reissued to provide IPP with specific information on ensuring that establishments have considered potential hazards from ingredients that are added to the product after the lethality treatment.

II. BACKGROUND

A. The HACCP regulations require that federally inspected establishments take preventative and corrective measures at each stage of the food production process where food safety hazards occur. The HACCP regulation (9 CFR 417.2(a)) requires establishments to conduct a hazard analysis to determine what food safety hazards are reasonably likely to occur in their production processes and to identify the preventive measures that they can apply to control those hazards. Establishments are obligated to reassess their HACCP plans annually and whenever any changes occur in their process, new scientific data relevant to their processes emerges, or other food safety issues are identified that could affect the hazard analysis or alter the HACCP plan.

B. Several meat and poultry recalls associated with the addition of ingredients, spices, or sauce after the lethality process step has made FSIS aware that establishments may have assumed that certain ingredients and spices are RTE. Consequently, FSIS is reissuing this notice to IPP to ensure that an establishment's food safety system addresses all potential food safety hazards associated with the production of their products, especially hazards from ingredients added to the product after the lethality step.

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C. These recalls underscore the need to consider all possible hazards at all steps in the production process, identify the hazards associated with all raw and not ready to eat materials received, and take steps to ensure that spices or other ingredients used are wholesome, are free of pathogens, and do not cross contaminate other food products in the processing environment. Establishments that produce meat or poultry products that are exposed to the environment after processing or to which ingredients or spices are added after the lethality process step need to ensure that all possible hazards have been eliminated.

III. IPP RESPONSIBILITIES

A. IPP are not to assume that all ingredients (e.g., spices, seasoning mixes, lard, hydrolyzed vegetable protein) have been treated (e.g., irradiated) in some manner to address the pathogens of concern. Adulteration and contamination in RTE products can occur in the post-processing environment. Product can become contaminated through contact with insanitary surfaces, improper handling by establishment employees, the addition of raw materials or ingredients after the lethality step, and contact with insect or animal vectors.

B. IPP are to verify that an establishment has evaluated the interventions applied by its suppliers to the ingredients and spices that it receives. IPP are to verify that the establishment is checking that its purchase specifications are met through, for example, certificates of analysis or other forms of documentation establishing the safety of the lots of raw materials, ingredients, or spices that it receives, and that the establishment performs any in-plant verification testing it has identified as necessary.

C. Specifically, IPP are to review the establishment's flow chart and hazard analysis, following the instructions in FSIS PHIS Directive 5000.1, CSIs Methods To Verify Regulatory Requirements, and

1. Verify that the establishment has addressed all hazards identified in the hazard analysis as associated with the production of RTE products, including, but not limited to, those associated with ingredients that are added post-lethality. If IPP learn that the establishment has made a change in its process, based on the nature of the change, IPP are to perform the appropriate verification activities per the instructions in FSIS PHIS Directive 5000.1;
2. Verify that the establishment has adequately incorporated into its food safety system (e.g., HACCP plans, Sanitation SOPs, or prerequisite programs) procedures for properly formulating the product and accurately labeling it to fully disclose the use of all ingredients;
3. Verify that the establishment has considered and addressed in its food safety system any vulnerability for environmental contamination (e.g., contamination from ingredients added post lethality, contamination from food handlers,

equipment, or insect or animal vectors); and

4. Verify that the establishment is following its food-safety system procedures.

D. IPP are to conduct all tasks identified in Part III. A, B and C above whenever the plant has implemented a new HACCP plan or made changes to an existing HACCP plan or process. As new and updated instructions for PHIS are issued, IPP are to perform the appropriate HACCP verification tasks for hazard analysis verification, including those in this notice, as communicated through the Establishment Task List and Calendar.

E. IPP are to take the appropriate enforcement action as set out in FSIS PHIS Directive 5000.1, and issue a non-compliance record, when the establishment:

1. Has not addressed the addition of ingredients post-lethality in its hazard analysis, SSOP, or HACCP plan as a potential biological food safety hazard;
2. Has not followed its procedures as set out in its food safety systems; or
3. Does not have supporting documentation to demonstrate that the ingredients it adds, and the post-lethality processing procedures it employs, result in a safe food product.

IV. DATA ANALYSIS

The Data Analysis and Integration Group (DAIG) with the Office of Data Integration and Food Protection will review PHIS data on a quarterly basis to track whether inspection activities have been completed. The analyses will include identifying trends in noncompliance by the type of activity. The data will be analyzed to determine whether potential trends exist in non-compliance records issued in relation to post-lethality exposed RTE products. The DAIG will evaluate the data to determine whether potential trends exist on a national, district, and establishment level.

Refer questions regarding this notice to the Policy Development Division through *askFSIS* at <http://askfsis.custhelp.com> or by telephone at 1-800-233-3935.



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