

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

FSIS NOTICE	11/8/11	61-11
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REVIEWING ESTABLISHMENT *SALMONELLA* CONTROL PROGRAMS FOR RAW CLASSES OF MEAT OR POULTRY PRODUCT

I. PURPOSE

This notice cancels FSIS notice 57-11, Reviewing Establishment *Salmonella* Control Programs for Raw Classes of Meat or Poultry Product. FSIS notice 57-11, focused attention on pre-harvest activities. The goal of the notice, however, was to have inspection program personnel (IPP) verify the adequacy of establishments' food safety systems overall. Therefore, this notice directs IPP to become familiar with, and to review data from, any programs establishments use to control or monitor *Salmonella* in raw classes of product. FSIS is issuing this notice in light of recent illness outbreaks related to *Salmonella* contamination in raw ground turkey products.

II. IPP RESPONSIBILITIES

A. Upon receipt of this notice, IPP are to determine whether an establishment has procedures in place designed to address the control or the monitoring of *Salmonella* in any programs within its food safety system (e.g., HACCP, Sanitation Standard Operating Procedures, prerequisite programs, or other programs the establishment does not consider part of the HACCP system). These programs may include, but are not limited to:

1. *Salmonella* testing of incoming materials, products, or the facility or lairage environment prior to slaughter;
2. Testing for other bacterial contamination when the establishment uses that data to support decisions about *Salmonella*;
3. Interventions to reduce or eliminate *Salmonella*; or
4. Other programs intended to reduce *Salmonella* at the establishment.

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OPI: OPPD

B. If the establishment has procedures in place designed to address the control of *Salmonella*, IPP are to discuss these programs at the next weekly meeting and seek answers to such questions as:

1. What data are collected in support of each program? Does the establishment measure just positive/negative *Salmonella* status for each sample, or does it collect additional information, such as:
 - a. The level of *Salmonella* contamination in each sample (enumeration), or
 - b. The kinds of *Salmonella* found in samples by serogroup or serotype (e.g. Heidelberg, Hadar)?
2. Does the establishment view this data as a measure of the control achieved by each program? For example:
 - a. Does the establishment analyze the data and track the results of each program? If so, what types of analysis does it do?
 - b. Does the establishment use the data to support or verify the effectiveness of the particular program? If so, how does it use the data to perform this function?
 - c. Does the establishment determine whether there are normal fluctuations in the data, or whether the particular program is not functioning as designed (i.e., is out of control)? On what basis does the establishment make this determination?
 - d. Does the establishment respond if its data show that the program is not functioning as designed? What does the establishment do if it makes this data-based determination?

C. IPP are to document this discussion in a Memorandum of Interview as set out in FSIS Directive 5000.1 or FSIS PHIS Directive 5000.1.

D. In accordance with the instructions in FSIS Directive 5000.2, Review of Establishment Testing Data by Inspection Program Personnel, on a weekly basis, IPP are to review the data from any *Salmonella* control or monitoring program, unless another frequency is more appropriate based on when the establishments collects the data. For example, if the establishment collects *Salmonella* data or other data related to *Salmonella* on a monthly basis, then IPP are to review that specific data monthly.

E. When necessary, at the weekly meeting, IPP are to discuss with the establishment management any trends that IPP believe may indicate that a particular program is not controlling *Salmonella* and ask what actions, if any, establishment management has taken to re-establish control. IPP are to look for trends such as:

1. A significant portion of the results in a particular program exceed the establishment's criteria over time;

2. A few instances of the program results exceeding the establishment's criteria by a large amount within a relatively short period of time (e.g., days or weeks); or
3. The program results show a trend of worsening performance over a relatively long period of time (e.g., months).

F. For the examples set out below, the results would not represent regulatory noncompliance in themselves. However, IPP would be expected to discuss the findings with establishment management to find out how it interpreted and responded to the results.

Examples: Establishment A analyzes a sample of ground poultry for *Salmonella* once per production period and has set a criterion of no more than 20 percent positive results in a moving window of the most recent 10 samples (no more than 2 out of 10). The following scenarios are examples of situations that should prompt IPP to discuss the results with establishment management. Note that the numerical values in the examples are NOT intended to define the limits of good or bad performance. They are only intended to illustrate possible results that should prompt further discussion.

1. IPP observe that over the course of one month, the positive test results exceeded the establishment criteria of 2 positives in the moving 10-sample window on 5 occasions.
2. IPP observe that over the course of one week, the positive test results reached 8 or 9 of the last 10 samples on multiple occasions, significantly exceeding the establishment's control limit of 2 positives.
3. IPP observe that over the course of 3 months, the positive test results exceeded the establishment's criteria 1 time during the first month, 3 times during the second month, and 7 times during the third month, demonstrating a trend of worsening performance.

G. If IPP have questions on the design of the program, the manner in which the establishment collects or analyzes the data, developing trends, or how the establishment responds to its results, they are to address their concerns through supervisory channels.

NOTE: IPP are to follow instructions in FSIS Directive 5020.1, Verification of *Salmonella* Initiative Program (SIP), Section IX. to verify *Salmonella* sampling and testing in establishments participating in the SIP.

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

A handwritten signature in black ink, appearing to read "David J. Seibert". The signature is written in a cursive style with a prominent loop at the end.

Assistant Administrator
Office of Policy and Program Development