



NATIONAL
EMPLOYMENT
LAW
PROJECT

FOIA 2018-00227

Christine L. Owens
Executive Director

www.nelp.org

March 6, 2018

Received in USDA/FSIS

NELP National Office
75 Maiden Lane
Suite 601
New York, NY 10038
212-285-3025

FSIS Freedom of Information Act Office
Room 2168-South Building
14th and Independence Avenue, SW
Washington, DC 20250-3700

MAR 06 2018

FOIA Office

Washington DC Office
2040 S Street NW
Lower Level
Washington, DC 20009
202-640-6520

Transmitted by email to fsis.foia@usda.gov

Re: Freedom of Information Request

California Office
2030 Addison Street
Suite 310
Berkeley, CA 94704
510-982-5945

Dear FSIS FOIA Coordinator:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, the National Employment Law Project (NELP) makes the following request for records.

Washington State Office
317 17th Avenue South
Seattle, WA 98144
206-324-4000

Requested Records

- 1) The data, spreadsheets, reports, and preliminary analysis conducted by FSIS, or obtained by FSIS from another government agency or private party, to compare the in-establishment employee injury rates between HIMP and traditional swine slaughter plants from 2002-2010 that the agency refers to in the proposed rule, Modernization of Swine Slaughter Inspection, published in the Federal register on February 1, 2018. FSIS refers to this data in the proposed rule on page 4796 (83 Fed. Reg. 4796). None of this data is contained in the docket (Docket No. FSIS-2-16-0017 at Regulations.gov.)
- 2) The names and addresses of all the 24 traditional plants who's in-establishment injury rates were used in the preliminary analysis referenced above and cited in the preamble to the proposed Modernization of Swine Slaughter Inspection Proposed rule at 83 Fed. Reg. 4796
- 3) Data and any information from 2002-2010 on the number of sorters on the lines, line speeds, number of shifts operating, and dates of plant operation, in any of the above mentioned 24 traditional plants as well as 5 HIMP plants that FSIS used or relied on in the preliminary analysis of in-establishment injury rates referred to on 83 Fed. Reg. 4786.
- 4) Any data, spreadsheets, reports, analysis, studies of employee injury and illness rates in swine slaughter establishments conducted by FSIS using data after 2011.
- 5) The identity of the 35 establishments that FSIS stated in the Risk Assessment are the most probable to adopt the new inspection system and the reasons, criteria, inspection data or other data used by the agency to make this determination.
<https://www.fsis.usda.gov/wps/wcm/connect/0c03ed4d-68bf-4bd9-80e0-b8f3aa6ff16e/ModernizationSwineSlaughterRiskAssessment.pdf?MOD=AJPERES>

Under the FOIA Improvements Act of 2016, agencies are required to adopt a presumption of disclosure, withholding information only if "disclosure is prohibited by law" or "disclosure would harm an interest protected by an exemption." If it is your position that any portion of the requested records is exempt from

disclosure, NELP requests that you provide an index of those documents as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). As you are aware, the Vaughn index should describe each document claimed as exempt with sufficient specificity "to permit a reasoned judgment as to whether the material is actually exempt under FOIA." *Founding Church of Scientology of Washington, D.C. v. Bell*, 603 F.2d. 945, 949 (D.C. Cir. 1979).

Fee Waiver Request

NELP requests a fee waiver pursuant to 5 U.S.C. § 552(a)(4)(A)(iii), 7 C.F.R. § 1.5(a) & app. A § 6(a), and 9 C.F.R. § 390.5(b). NELP is a nonprofit workers' rights organization, and this request is not being made for any commercial use. NELP intends to use the information gathered by this FOIA request to prepare comments on the proposed rule 'Modernization of Swine Slaughter Inspection.' A fee waiver is therefore consistent with the Department's fee waiver standards as articulated at 7 C.F.R. Part 1, Subpart A, Appendix A, Section 6(a).

Request for Expedited Processing

NELP also requests expedited processing of this request pursuant to 5 U.S.C. § 552(a)(6)(E)(i), 7 C.F.R. § 1.9, and 9 C.F.R. § 390.5(a)(4). The Department's regulations provide that expedited processing is available where there is "[a]n urgency to inform the public about an actual or alleged federal government activity, if made by an individual primarily engaged in disseminating information." 7 C.F.R. § 1.9(b)(2).

First, this request satisfies the "urgency" requirement as provided by the Department's FOIA regulations. FSIS has proposed a new inspection program for swine slaughter (NSIS) in the proposed rule, 'Modernization of Swine Slaughter' published on February 1, 2018. FSIS has requested comments from the public on the proposed rule, and the deadline for submitting comments is May 2, 2018. The new proposed NSIS would increase line speeds in swine slaughter establishments with devastating consequences to in establishment worker safety and health. FSIS summarized a preliminary analysis of self-reported plant injury and illness data, but did not provide any of the data to permit careful scrutiny and evaluation of this analysis for the public in order to provide comments to the agency. The information requested in this FOIS is pertinent to the public's understanding of the proposed rule, and to commenters' ability to advise FSIS of their views. The deadline for public comment on the proposed rule is May 2, 2018. *See* 83 Fed. Reg. 4780-4823. Absent expedited processing, the data used to support FSIS's preliminary analysis of worker injury rates in non HIMP vs HIMP plants may not be made available before the May 2 comment deadline, and the particular value of this information to the public's ability to comment on the proposed rule will be lost. *See* 7 C.F.R. § 1.9(b)(2) (providing that "urgency" is established where "the information has a particular value that will be lost if not disseminated quickly").

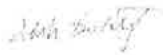
Second NELP is "primarily engaged in disseminating information" for purposes of this FOIA request. The Department's regulations provide that requesters need not be members of the news media to meet this requirement, but may establish that "their primary activity involves publishing or otherwise disseminating information to the public as a whole." *Id.* As a workers' rights advocacy organization, NELP routinely publishes reports and analyses of federal activity for the purpose of educating the public of the import of federal policy on the economic well-being of low-wage, unemployed, or vulnerable workers. *See, e.g.,* Fact

Sheet, *Responding at the Federal and State Levels to the Needs of Unemployed Families Resulting from Hurricanes Harvey and Irma* (Sept. 12, 2017), available at <http://bit.ly/2A64LiT>; Fact Sheet, *The Trump Administration's War on Workers and Families* (Oct. 2, 2017), available at <http://bit.ly/2A7pXEX>; see also generally <http://www.nelp.org/publications/>. NELP has in fact already engaged in public advocacy regarding the issue of meat and poultry line speeds. See, e.g., Deborah Berkowitz, NELP, *Congressional Testimony on Harsh Conditions Endured by America's Poultry Workers* (Sept. 8, 2017), available at <http://bit.ly/2xMQmq3>. In addition, as explained above, NELP intends to use any requested records it receives to further educate the public on the Department's proposed new policies regarding swine inspection requirements, and to comment on the proposed rule, which will be posted online (on both the NELP website and at www.regulations.gov) for public dissemination. NELP therefore meets the requirement that it be "primarily engaged in disseminating information" for purposes of justifying this request for expedited FOIA processing. See 7 C.F.R. § 1.9(b)(2).

Pursuant to 7 C.F.R. § 1.9(c), I certify that the information supporting this request for expedited processing is true and correct to the best of my knowledge.

Thank you for your prompt attention to this FOIA request. Please feel free to contact me at (b) (6) or Dberkowitz@nelp.org if you have any questions

Sincerely,



Deborah Berkowitz
Senior Fellow, Worker Safety and Health
NELP
2040 S Street, NW
Washington, DC 20009

Establishment ID	Size or HACCP Processing Size	Volume
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6162663	Small	High Volume
6162680	Very Small	Low Volume
6162863	Very Small	Low Volume
6163009	Very Small	Low Volume

Market Swine Only	Total Head Count	NSIS
Mix	384	Will Not Convert
Mix	1573	Will Not Convert
Mix	7484	Will Not Convert
Mix	24923	Will Not Convert
Mix	84	Will Not Convert
Mix	13138	Will Not Convert
Mix	1895	Will Not Convert
Mix	307	Will Not Convert
Mix	6034	Will Not Convert
Mix	298	Will Not Convert
MS Only	1388	Will Not Convert
Mix	71	Will Not Convert
Mix	5134	Will Not Convert
Mix	82231	Will Not Convert
Mix	267	Will Not Convert
Mix	11240	Will Not Convert
Mix	120	Will Not Convert
Mix	98705	Will Not Convert
MS Only	220173	Will Convert
MS Only	2822944	Will Convert
Mix	83677	Will Not Convert
Mix	363132	Will Not Convert
Mix	588	Will Not Convert
Mix	150259	Will Not Convert
Mix	39566	Will Not Convert
Mix	13478	Will Not Convert
MS Only	9648	Will Not Convert
MS Only	7970864	Will Convert
Mix	80587	Will Not Convert
Mix	1311	Will Not Convert
MS Only	1769	Will Not Convert
Mix	226056	Will Not Convert
Mix	1610	Will Not Convert
Mix	60817	Will Not Convert
Mix	1743	Will Not Convert
Mix	415	Will Not Convert
Mix	23	Will Not Convert
Mix	517	Will Not Convert
Mix	1071	Will Not Convert
Mix	679	Will Not Convert
Mix	483	Will Not Convert
Mix	269	Will Not Convert
Mix	216	Will Not Convert
Mix	264	Will Not Convert
Mix	158	Will Not Convert
Mix	469	Will Not Convert
Mix	577	Will Not Convert

Mix	13881	Will Not Convert
Mix	3008	Will Not Convert
Mix	53811	Will Not Convert
Mix	324	Will Not Convert
Mix	1891	Will Not Convert
Mix	459	Will Not Convert
Mix	815	Will Not Convert
Mix	98622	Will Not Convert
Mix	1356	Will Not Convert
Mix	384	Will Not Convert
Mix	139	Will Not Convert
Mix	208	Will Not Convert
Mix	573	Will Not Convert
Mix	1531	Will Not Convert
Mix	170095	Will Not Convert
Mix	373	Will Not Convert
Mix	1380	Will Not Convert
Mix	336	Will Not Convert
Mix	2357	Will Not Convert
Mix	1030	Will Not Convert
Mix	1981	Will Not Convert
Mix	43929	Will Not Convert
Mix	49724	Will Not Convert
Mix	194	Will Not Convert
Mix	1354	Will Not Convert
Mix	428	Will Not Convert
Mix	101391	Will Not Convert
Mix	82929	Will Not Convert
MS Only	2468270	Will Convert
Mix	798	Will Not Convert
MS Only	128	Will Not Convert
Mix	186	Will Not Convert
Mix	217	Will Not Convert
Mix	425891	Will Not Convert
Mix	803	Will Not Convert
Mix	34289	Will Not Convert
Mix	8335	Will Not Convert
Mix	87	Will Not Convert
Mix	42585	Will Not Convert
MS Only	205	Will Not Convert
Mix	101	Will Not Convert
Mix	1179	Will Not Convert
Mix	334	Will Not Convert
Mix	238	Will Not Convert
MS Only	374	Will Not Convert
Mix	2115	Will Not Convert
MS Only	225	Will Not Convert
MS Only	2	Will Not Convert

MS Only	2310474	Will Convert
MS Only	3	Will Not Convert
Mix	439	Will Not Convert
Mix	8738	Will Not Convert
Mix	700	Will Not Convert
Mix	2800	Will Not Convert
Mix	7102	Will Not Convert
MS Only	63	Will Not Convert
Mix	331	Will Not Convert
Mix	29140	Will Not Convert
Mix	103	Will Not Convert
MS Only	2	Will Not Convert
Mix	1344	Will Not Convert
Mix	81	Will Not Convert
Mix	364	Will Not Convert
Mix	3009	Will Not Convert
Mix	1784	Will Not Convert
Mix	2435	Will Not Convert
Mix	952	Will Not Convert
MS Only	5094313	HIMP
MS Only	5071652	Will Convert
MS Only	3497988	Will Convert
Mix	30974	Will Not Convert
Mix	8066	Will Not Convert
MS Only	557	Will Not Convert
Mix	4363	Will Not Convert
Mix	67941	Will Not Convert
Mix	1246	Will Not Convert
Mix	959931	Will Not Convert
Mix	579	Will Not Convert
Mix	859	Will Not Convert
Mix	1364	Will Not Convert
Mix	1313	Will Not Convert
MS Only	4266033	Will Convert
Mix	57488	Will Not Convert
Mix	6612	Will Not Convert
MS Only	365	Will Not Convert
Mix	251	Will Not Convert
MS Only	5259353	Will Convert
MS Only	5748030	Will Convert
MS Only	4983110	HIMP
Mix	2392	Will Not Convert
Mix	4870	Will Not Convert
Mix	886	Will Not Convert
Mix	337	Will Not Convert
Mix	118	Will Not Convert
Mix	192	Will Not Convert
Mix	280	Will Not Convert

Mix	468	Will Not Convert
Mix	135	Will Not Convert
Mix	69	Will Not Convert
Mix	165	Will Not Convert
Mix	129	Will Not Convert
MS Only	108	Will Not Convert
Mix	171	Will Not Convert
Mix	90	Will Not Convert
Mix	524	Will Not Convert
Mix	143	Will Not Convert
Mix	204	Will Not Convert
Mix	39	Will Not Convert
Mix	197	Will Not Convert
Mix	1153	Will Not Convert
Mix	343	Will Not Convert
Mix	1392	Will Not Convert
Mix	806	Will Not Convert
MS Only	4778746	Will Convert
MS Only	4843220	Will Convert
MS Only	2641961	Will Convert
MS Only	2188030	Will Convert
MS Only	5743006	Will Convert
MS Only	2782267	HIMP
MS Only	2307368	Will Convert
MS Only	5331348	Will Convert
Mix	6926	Will Not Convert
MS Only	2891620	Will Convert
MS Only	2846660	Will Convert
Mix	171	Will Not Convert
Mix	427	Will Not Convert
Mix	1597	Will Not Convert
MS Only	93	Will Not Convert
Mix	550	Will Not Convert
Mix	816	Will Not Convert
Mix	546	Will Not Convert
Mix	671	Will Not Convert
MS Only	28	Will Not Convert
Mix	242	Will Not Convert
Mix	539	Will Not Convert
Mix	160	Will Not Convert
Mix	149281	Will Not Convert
Mix	148	Will Not Convert
Mix	2159	Will Not Convert
Mix	9039	Will Not Convert
MS Only	2868039	Will Convert
MS Only	57	Will Not Convert
Mix	300073	Will Not Convert
Mix	1457	Will Not Convert

Mix	1091	Will Not Convert
Mix	964	Will Not Convert
Mix	2440	Will Not Convert
Mix	485	Will Not Convert
Mix	1985	Will Not Convert
Mix	402	Will Not Convert
Mix	273865	Will Not Convert
Mix	1150	Will Not Convert
Mix	373	Will Not Convert
Mix	364	Will Not Convert
Mix	246	Will Not Convert
Mix	1090	Will Not Convert
Mix	981	Will Not Convert
MS Only	359	Will Not Convert
Mix	890	Will Not Convert
MS Only	170	Will Not Convert
Mix	436	Will Not Convert
Mix	997	Will Not Convert
Mix	457	Will Not Convert
Mix	2850	Will Not Convert
MS Only	528	Will Not Convert
Mix	521	Will Not Convert
Mix	984	Will Not Convert
MS Only	5501025	Will Convert
Mix	314	Will Not Convert
Mix	125	Will Not Convert
Mix	317	Will Not Convert
Mix	1246	Will Not Convert
Mix	360871	Will Not Convert
Mix	4507	Will Not Convert
Mix	354	Will Not Convert
Mix	726	Will Not Convert
MS Only	123	Will Not Convert
Mix	44466	Will Not Convert
Mix	49	Will Not Convert
Mix	209	Will Not Convert
Mix	59033	Will Not Convert
MS Only	558	Will Not Convert
Mix	13936	Will Not Convert
Mix	115088	Will Not Convert
Mix	7570	Will Not Convert
Mix	1969	Will Not Convert
Mix	1473	Will Not Convert
Mix	117283	Will Not Convert
Mix	414495	Will Not Convert
Mix	1317	Will Not Convert
Mix	2234	Will Not Convert
Mix	499	Will Not Convert

Mix	577931	Will Not Convert
Mix	15107	Will Not Convert
Mix	262	Will Not Convert
Mix	271	Will Not Convert
Mix	271	Will Not Convert
Mix	779	Will Not Convert
Mix	2517	Will Not Convert
Mix	24449	Will Not Convert
MS Only	145	Will Not Convert
Mix	898	Will Not Convert
Mix	79	Will Not Convert
Mix	484	Will Not Convert
MS Only	88	Will Not Convert
Mix	26	Will Not Convert
Mix	295	Will Not Convert
Mix	345	Will Not Convert
Mix	636	Will Not Convert
Mix	440	Will Not Convert
Mix	421	Will Not Convert
Mix	563	Will Not Convert
Mix	4865	Will Not Convert
Mix	443	Will Not Convert
Mix	169	Will Not Convert
Mix	1038	Will Not Convert
Mix	258	Will Not Convert
Mix	741	Will Not Convert
Mix	635	Will Not Convert
Mix	28838	Will Not Convert
Mix	2151	Will Not Convert
MS Only	1737504	HIMP
Mix	843	Will Not Convert
Mix	198	Will Not Convert
Mix	5527	Will Not Convert
MS Only	55	Will Not Convert
MS Only	9	Will Not Convert
Mix	8102	Will Not Convert
MS Only	32	Will Not Convert
Mix	1272	Will Not Convert
Mix	1228987	Will Not Convert
Mix	6675	Will Not Convert
Mix	142	Will Not Convert
Mix	1750	Will Not Convert
Mix	1843	Will Not Convert
Mix	111	Will Not Convert
Mix	304	Will Not Convert
Mix	1009	Will Not Convert
Mix	669	Will Not Convert
MS Only	10	Will Not Convert

Mix	1221	Will Not Convert
Mix	299	Will Not Convert
MS Only	993	Will Not Convert
Mix	66	Will Not Convert
Mix	1100	Will Not Convert
Mix	760	Will Not Convert
Mix	230	Will Not Convert
Mix	398	Will Not Convert
Mix	1822	Will Not Convert
Mix	702	Will Not Convert
Mix	1664	Will Not Convert
Mix	1480	Will Not Convert
Mix	324	Will Not Convert
MS Only	2920060	HIMP
Mix	1100	Will Not Convert
Mix	321	Will Not Convert
Mix	546	Will Not Convert
Mix	254	Will Not Convert
Mix	497	Will Not Convert
Mix	214	Will Not Convert
Mix	918	Will Not Convert
Mix	1123	Will Not Convert
Mix	1154	Will Not Convert
Mix	291	Will Not Convert
Mix	1643	Will Not Convert
Mix	411	Will Not Convert
Mix	181	Will Not Convert
Mix	1048	Will Not Convert
Mix	1236	Will Not Convert
Mix	527	Will Not Convert
Mix	486	Will Not Convert
Mix	482	Will Not Convert
MS Only	7	Will Not Convert
Mix	117	Will Not Convert
MS Only	201	Will Not Convert
Mix	2225	Will Not Convert
Mix	718	Will Not Convert
Mix	1627	Will Not Convert
Mix	146	Will Not Convert
Mix	1848	Will Not Convert
Mix	539	Will Not Convert
Mix	220	Will Not Convert
Mix	220	Will Not Convert
Mix	110144	Will Not Convert
Mix	2559	Will Not Convert
Mix	552	Will Not Convert
Mix	951	Will Not Convert
Mix	589	Will Not Convert

Mix	151	Will Not Convert
Mix	879	Will Not Convert
MS Only	139	Will Not Convert
Mix	1210	Will Not Convert
Mix	409	Will Not Convert
Mix	162	Will Not Convert
Mix	726	Will Not Convert
Mix	4589	Will Not Convert
Mix	825	Will Not Convert
Mix	816	Will Not Convert
Mix	2574	Will Not Convert
MS Only	594	Will Not Convert
Mix	930	Will Not Convert
MS Only	59	Will Not Convert
Mix	284	Will Not Convert
MS Only	140	Will Not Convert
Mix	33	Will Not Convert
MS Only	74	Will Not Convert
Mix	289	Will Not Convert
Mix	46657	Will Not Convert
Mix	204	Will Not Convert
Mix	605	Will Not Convert
Mix	12743	Will Not Convert
Mix	460	Will Not Convert
Mix	4078	Will Not Convert
Mix	758	Will Not Convert
Mix	390	Will Not Convert
Mix	2129	Will Not Convert
Mix	38	Will Not Convert
Mix	673	Will Not Convert
Mix	1631	Will Not Convert
Mix	1309	Will Not Convert
Mix	412	Will Not Convert
Mix	44437	Will Not Convert
Mix	2453	Will Not Convert
Mix	2955	Will Not Convert
Mix	13228	Will Not Convert
Mix	9	Will Not Convert
Mix	867	Will Not Convert
Mix	12505	Will Not Convert
MS Only	36	Will Not Convert
Mix	719	Will Not Convert
Mix	2505	Will Not Convert
MS Only	15	Will Not Convert
Mix	16824	Will Not Convert
MS Only	335	Will Not Convert
Mix	176	Will Not Convert
Mix	1002	Will Not Convert

MS Only	508	Will Not Convert
Mix	516	Will Not Convert
Mix	371	Will Not Convert
MS Only	191	Will Not Convert
Mix	1834	Will Not Convert
Mix	22421	Will Not Convert
Mix	1691	Will Not Convert
Mix	3831	Will Not Convert
Mix	1565	Will Not Convert
Mix	1404	Will Not Convert
Mix	125	Will Not Convert
Mix	1604	Will Not Convert
Mix	547	Will Not Convert
MS Only	1015	Will Not Convert
Mix	10196	Will Not Convert
MS Only	8	Will Not Convert
Mix	769	Will Not Convert
Mix	2344	Will Not Convert
Mix	388	Will Not Convert
Mix	358	Will Not Convert
Mix	1103	Will Not Convert
Mix	1217	Will Not Convert
Mix	404	Will Not Convert
Mix	349	Will Not Convert
Mix	7475	Will Not Convert
Mix	245586	Will Not Convert
Mix	879	Will Not Convert
Mix	325	Will Not Convert
Mix	1190	Will Not Convert
MS Only	3	Will Not Convert
Mix	408	Will Not Convert
Mix	12317	Will Not Convert
Mix	373	Will Not Convert
Mix	563	Will Not Convert
Mix	101	Will Not Convert
Mix	8229	Will Not Convert
Mix	4018	Will Not Convert
Mix	1287	Will Not Convert
Mix	2588	Will Not Convert
Mix	301	Will Not Convert
Mix	10493	Will Not Convert
Mix	585	Will Not Convert
Mix	408	Will Not Convert
Mix	1717	Will Not Convert
Mix	2890	Will Not Convert
Mix	86375	Will Not Convert
Mix	2084	Will Not Convert
Mix	3184	Will Not Convert

Mix	229	Will Not Convert
Mix	632	Will Not Convert
Mix	445	Will Not Convert
Mix	229	Will Not Convert
Mix	1685	Will Not Convert
Mix	67394	Will Not Convert
MS Only	150861	Will Convert
Mix	11529	Will Not Convert
Mix	194	Will Not Convert
MS Only	323	Will Not Convert
Mix	145	Will Not Convert
Mix	624	Will Not Convert
MS Only	759742	Will Convert
Mix	384	Will Not Convert
Mix	2784	Will Not Convert
MS Only	145	Will Not Convert
Mix	924	Will Not Convert
Mix	3425	Will Not Convert
MS Only	6169966	Will Convert
Mix	2205	Will Not Convert
Mix	48	Will Not Convert
Mix	1022	Will Not Convert
Mix	757	Will Not Convert
Mix	1511	Will Not Convert
MS Only	5986	Will Not Convert
Mix	499	Will Not Convert
Mix	951	Will Not Convert
Mix	170	Will Not Convert
Mix	592	Will Not Convert
Mix	570	Will Not Convert
Mix	234	Will Not Convert
Mix	1801	Will Not Convert
Mix	130	Will Not Convert
MS Only	101423	Will Convert
Mix	805	Will Not Convert
Mix	5227	Will Not Convert
Mix	97	Will Not Convert
Mix	40	Will Not Convert
Mix	6866	Will Not Convert
Mix	1020	Will Not Convert
Mix	5069	Will Not Convert
Mix	634	Will Not Convert
Mix	238	Will Not Convert
Mix	3688	Will Not Convert
Mix	2635	Will Not Convert
MS Only	314791	Will Convert
MS Only	2499	Will Not Convert
Mix	442	Will Not Convert

Mix	2304	Will Not Convert
MS Only	33	Will Not Convert
Mix	2860	Will Not Convert
MS Only	349	Will Not Convert
Mix	143	Will Not Convert
Mix	324	Will Not Convert
Mix	472	Will Not Convert
Mix	485	Will Not Convert
Mix	47	Will Not Convert
Mix	170	Will Not Convert
Mix	1414	Will Not Convert
Mix	814	Will Not Convert
Mix	1127	Will Not Convert
Mix	743	Will Not Convert
Mix	16688	Will Not Convert
Mix	2619	Will Not Convert
MS Only	58965	Will Convert
MS Only	320	Will Not Convert
Mix	1044	Will Not Convert
Mix	429	Will Not Convert
Mix	213	Will Not Convert
Mix	317	Will Not Convert
MS Only	3	Will Not Convert
Mix	2859	Will Not Convert
MS Only	305	Will Not Convert
Mix	55	Will Not Convert
Mix	192	Will Not Convert
Mix	510	Will Not Convert
Mix	649	Will Not Convert
Mix	198	Will Not Convert
Mix	5262	Will Not Convert
Mix	1516	Will Not Convert
Mix	357	Will Not Convert
Mix	11703	Will Not Convert
Mix	564	Will Not Convert
MS Only	505	Will Not Convert
MS Only	1261	Will Not Convert
Mix	137	Will Not Convert
Mix	44	Will Not Convert
Mix	1	Will Not Convert
Mix	70	Will Not Convert
MS Only	25	Will Not Convert
Mix	908	Will Not Convert
Mix	122	Will Not Convert
Mix	207	Will Not Convert
Mix	338	Will Not Convert
Mix	22	Will Not Convert
Mix	1309	Will Not Convert

Mix	277	Will Not Convert
MS Only	19	Will Not Convert
MS Only	49	Will Not Convert
Mix	173	Will Not Convert
Mix	840	Will Not Convert
Mix	195	Will Not Convert
Mix	120	Will Not Convert
Mix	659	Will Not Convert
Mix	164	Will Not Convert
Mix	14	Will Not Convert
Mix	16911	Will Not Convert
MS Only	53216	Will Convert
Mix	16	Will Not Convert
Mix	1872	Will Not Convert
Mix	226	Will Not Convert
Mix	5979	Will Not Convert
MS Only	140005	Will Convert
Mix	612	Will Not Convert
Mix	955	Will Not Convert
MS Only	11	Will Not Convert
MS Only	10	Will Not Convert
Mix	1256	Will Not Convert
MS Only	1358	Will Not Convert
Mix	656	Will Not Convert
Mix	129	Will Not Convert
MS Only	23	Will Not Convert
Mix	472	Will Not Convert
Mix	1209	Will Not Convert
MS Only	318508	Will Convert
Mix	1296	Will Not Convert
Mix	396	Will Not Convert
MS Only	660	Will Not Convert
Mix	628	Will Not Convert
Mix	459	Will Not Convert
Mix	66	Will Not Convert
Mix	801	Will Not Convert
MS Only	1002	Will Not Convert
Mix	384	Will Not Convert
MS Only	809381	Will Convert
Mix	3749	Will Not Convert
MS Only	75	Will Not Convert
Mix	479	Will Not Convert
Mix	190	Will Not Convert
MS Only	671	Will Not Convert
Mix	476	Will Not Convert
Mix	151	Will Not Convert
Mix	405	Will Not Convert
MS Only	191710	Will Convert

Mix	590	Will Not Convert
Mix	700	Will Not Convert
MS Only	1609078	Will Convert
Mix	1596	Will Not Convert
Mix	389	Will Not Convert
MS Only	474	Will Not Convert
Mix	294	Will Not Convert
Mix	454	Will Not Convert
Mix	452	Will Not Convert
MS Only	99	Will Not Convert
Mix	77	Will Not Convert
MS Only	117	Will Not Convert
Mix	249	Will Not Convert
Mix	192	Will Not Convert
MS Only	18	Will Not Convert
Mix	627	Will Not Convert
MS Only	289	Will Not Convert
Mix	424	Will Not Convert
Mix	389	Will Not Convert
Mix	5582	Will Not Convert
Mix	25	Will Not Convert
MS Only	82378	Will Convert
Mix	1218	Will Not Convert
MS Only	544	Will Not Convert
Mix	189	Will Not Convert
Mix	548	Will Not Convert
Mix	78	Will Not Convert
Mix	87	Will Not Convert
Mix	2061	Will Not Convert
MS Only	15450	Will Not Convert
Mix	273	Will Not Convert
Mix	122	Will Not Convert
Mix	113	Will Not Convert
MS Only	27622	Will Convert
MS Only	16	Will Not Convert
MS Only	310	Will Not Convert
Mix	18	Will Not Convert

To determine the effect of the proposed rule on in-establishment worker safety, FSIS compared in-establishment injury rates between HIMP and traditional establishments¹ from 2002 to 2010. The preliminary analysis has shown that HIMP establishments had lower mean injury rates as compared to traditional establishments, Table XX.

The data used for the analysis was gathered from the Department of Labor (DOL), Occupational Safety and Health Administration (OSHA) from the Bureau of Labor Statistics, Survey of Occupational Injuries and Illnesses. FSIS subset the OSHA data for Hog slaughter plants comparing this data to the FSIS Public Health Information System data. The analysis excluded the 27 lowest volume plants², leaving 27 plants (5 HIMP and 24 Traditional). The results showed HIMP plants had a lower mean number of injuries using OSHA injury rates³ as compared to traditional plants. The independence of means test was used to verify the statistical significance of the analysis, and the

¹The analyses included the 5 HIMP establishments and 24 randomly selected large and small high volume establishments. Every establishment had an annual production value of at least 100,000 heads.

²Volume data was acquired for 2011 from the FSIS Public health information system and matched to the establishment level data to filter by slaughter volume. Plants with the lowest volumes at less than 100,000 head per year were excluded.

³The OSHA data has three types of indices for an Annual basis, Total Case Rate (TCR), Days Away Transferred Restricted (DART), and Days Away From Work (DAFW). Please see the OSHA website for more information and for the calculation of the indices listed above.
<https://www.osha.gov/oshstats/work.html>

equality of variances in the Levene's test as well as the t-test were used to evaluate the HIMP and Traditional injury rate means, please see tables below.

OSHA data does have some limitations, because establishments voluntarily submit injury data on an annual basis, and the survey is only collected from participating States. Establishment data is not available for Alaska; Oregon; Puerto Rico; South Carolina; Washington; and Wyoming. Other limitations include underreporting of injuries, for instance non-inclusion of longer-term injuries such as hearing loss. For each data collection cycle, OSHA only collects data from a small portion of all private sector establishments in the United States (80,000 out of 7.5 million total establishments). The data may not be representative of all businesses. For a larger list of limitations and studies completed pertaining to the OSHA data limitations, please see the Bureau of Labor Statistics website, <http://www.bls.gov/iif/oshfaq1.htm#q01>.

Table XX : Annual Mean Injury Rates by Establishment Type

Type of Establishment	Total Case Rate of Injuries*(TCR)	Days Away Transferred and Restricted* (DATR)	Days Away From Work* (DAW)
HIMP	10.46	6.61	1.00
Traditional	16.38	10.16	2.61

* All values are calculated means of incidence rates per 100 employees by establishment.

Statistical Means and Tests for Significance

The tables below show the statistical output of the analysis for the Levene's test as well as the various OSHA case rate indices used to compare the injury rates in traditional plants to HIMP plants. Overall the tests show statistical significance and lower case rates in HIMP plants.

		Observations / Years	Mean	Std. Deviation	Std. Error Mean
2012 Count of Swine Slaughtered	HIMP (5 plants)	24	3,165,410	1,381,477	281,993
	Traditional (24 plants)	119	1,926,069	2,290,391	209,960
Total Case Rate	HIMP (5 plants)	24	10.46	5.62	1.15
	Traditional (24 plants)	119	16.38	9.15	0.84
Days Away Transferred or Restricted	HIMP (5 plants)	24	6.61	3.77	0.77
	Traditional	119	10.16	7.23	0.66
Days Away From Work	HIMP (5 plants)	24	1.00	0.74	0.15
	Traditional (24 plants)	119	2.61	2.17	0.20

		Levene's Test for Equality of Variances		t-test for Equality of Means			
		F	Sig.	t	df	Sig. (2-tailed)	Mean Difference
2012 Count of Swine Slaughtered	Equal variances assumed	9.749	.002	2.554	141	.012	1,239,341.49
	Equal variances not assumed			3.525	52.429	.001	1,239,341.49
Total Case Rate	Equal variances assumed	5.503	.020	-3.050	141	.003	-5.92
	Equal variances not assumed			-4.165	51.308	.000	-5.92
Days Away Transferred Restricted	Equal variances assumed	6.980	.009	-2.340	141	.021	-3.55
	Equal variances not assumed			-3.497	62.936	.001	-3.55
Days Away From Work	Equal variances assumed	11.593	.001	-3.588	141	.000	-1.62
	Equal variances not assumed			-6.450	108.261	.000	-1.62

From: [Maculloch, Bryan - FSIS](#)
To: [Pugliese, Andrew - FSIS](#)
Subject: FW: Question
Date: Tuesday, February 27, 2018 1:58:13 PM
Attachments: [OSHA Hogs.msg](#)

From: Furey, Todd M. - FSIS
Sent: Thursday, March 24, 2016 4:25 PM
To: Catlin, Michelle - FSIS <Michelle.Catlin@fsis.usda.gov>
Cc: Maculloch, Bryan - FSIS <Bryan.Maculloch@fsis.usda.gov>; Anderson, Don - FSIS <Don.Anderson@fsis.usda.gov>
Subject: RE: Question

Yes, Bryan, Don Anderson and I worked on this project. We used OSHA data and linked it to PHIS.
Bottom line –

“the HIMP plants have statistically-low OSHA case rates than either of the comparison sets of Traditional plants.”

The complete details are attached.

Todd

From: Catlin, Michelle - FSIS
Sent: Thursday, March 24, 2016 4:07 PM
To: Furey, Todd M. - FSIS
Subject: Question

Was it someone on your staff who looked at injury data in hog himp vs non-himp? If so, what data did they use? (In phil's office on call with hill staff - just in case it comes up phil asked about it)

Sent from my Android phone using Symantec TouchDown (www.symantec.com)

From: [Maculloch, Bryan - FSIS](#)
To: [Pugliese, Andrew - FSIS](#)
Subject: FW: OSHA
Date: Thursday, April 7, 2016 8:27:49 AM
Attachments: [OSHA.docx](#)

Hi Andrew,

(b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Thanks!

Bryan

From: Maculloch, Bryan - FSIS
Sent: Thursday, January 14, 2016 4:42 PM
To: Furey, Todd M. - FSIS; Pugliese, Andrew - FSIS; Ajmera, Richa - FSIS
Subject: RE: OSHA

Here you go Todd. (b) (5) [REDACTED]
[REDACTED]

Thanks,

Bryan

From: Furey, Todd M. - FSIS
Sent: Thursday, January 14, 2016 4:13 PM
To: Pugliese, Andrew - FSIS; Ajmera, Richa - FSIS
Cc: Maculloch, Bryan - FSIS
Subject: Hogs

(b) (5) [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED] Please extract it and send a copy to me.

Thank you, Todd

Sent from my Android phone using Symantec TouchDown (www.symantec.com)

From: [Maculloch, Bryan - FSIS](#)
To: [Pugliese, Andrew - FSIS](#)
Subject: FW: OSHA Hogs
Date: Tuesday, February 27, 2018 2:08:19 PM

Hi Andrew, I found this as well.

Bryan

From: Anderson, Don - FSIS
Sent: Wednesday, December 2, 2015 10:13 AM
To: Maculloch, Bryan - FSIS <Bryan.Maculloch@fsis.usda.gov>; Pugliese, Andrew - FSIS <Andrew.Pugliese@fsis.usda.gov>; Furey, Todd M. - FSIS <Todd.Furey2@fsis.usda.gov>
Subject: RE: OSHA Hogs

OK, let me know if you need any more help

Don Anderson 202-821-9396

From: Maculloch, Bryan - FSIS
Sent: Wednesday, December 02, 2015 9:14 AM
To: Anderson, Don - FSIS; Pugliese, Andrew - FSIS; Furey, Todd M. - FSIS
Subject: RE: OSHA Hogs

Thanks for your help on this. (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thanks,

Bryan

From: Anderson, Don - FSIS
Sent: Wednesday, December 02, 2015 9:10 AM
To: Maculloch, Bryan - FSIS; Pugliese, Andrew - FSIS; Furey, Todd M. - FSIS
Subject: RE: OSHA Hogs

I have been out of town for a week or so. I don't remember if I heard back from anyone on this work. Can you give me a status report of where we are since I sent this and whether/what more work we have to do? Thanks, don

Don Anderson 202-821-9396

From: Anderson, Don - FSIS

Sent: Monday, November 16, 2015 11:11 AM

To: Maculloch, Bryan - FSIS; Pugliese, Andrew - FSIS; Furey, Todd M. - FSIS

Subject: OSHA Hogs

This document compares the OSHA case rates in the 5 HIMP plants to TWO different "comparison sets" of plants.

On page 1, the comparison group is 24 Traditional Plants that slaughter at least 100,000 Swine.

(For these comparisons I am using Andrew's 2012 slaughter data because it is the closest in time to the OSHA data but the first complete year of PHIS data).

The mean slaughter volume in HIMP is about 3.1 million/year; traditional 1.9 Million/year

The SECOND page narrows the number of traditional plants even more, by using a 1 million head threshold.

Mean HIMP is of course still 3.1 million; the Mean in the 10 Traditional plants is 4.2 million.

Either way you look at it, and by any of the 3 OSHA measures, the HIMP plants have statistically-low OSHA case rates than either of the comparison sets of Traditional plants.

I am also attaching a spreadsheet with just the HIMP and 2 comparison plant sets. Column F 'Comparison Group' has a filter on it.

Select 1 and 100,000 to see HIMP plus Traditional plants over 100,000 (including those over 1 million)

Select 1 and 1,000,000 to see HIMP plus Traditional plants over 1 million.

Schedule a meeting sometime if you want. What we probably should be thinking about is what other differences between HIMP and Traditional plants- besides slaughter volume- can and should we be trying to control for- data permitting.

<< File: osha data modified comparison plants 2012 slaughter.xlsx >>

<< File: One Hundred Thousand and One Million Hogs.docx >>

Don Anderson

Management Control and Audit Division

Office of Investigation, Enforcement & Audit

Food Safety and Inspection Service- USDA

202-821-9396

From: [Maculloch, Bryan - FSIS](#)
To: [Pugliese, Andrew - FSIS](#)
Subject: FW: OSHA Hogs
Date: Tuesday, February 27, 2018 2:08:55 PM
Attachments: [One Hundred Thousand and One Million Hogs.docx](#)
[osha data modified comparison plants 2012 slaughter.xlsx](#)
[swine osha match2002.xls](#)

From: Furey, Todd M. - FSIS
Sent: Wednesday, December 30, 2015 10:24 AM
To: Maculloch, Bryan - FSIS <Bryan.Maculloch@fsis.usda.gov>
Subject: FW: OSHA Hogs

From: Maculloch, Bryan - FSIS
Sent: Wednesday, December 30, 2015 10:11 AM
To: Furey, Todd M. - FSIS
Subject: FW: OSHA Hogs

Hi Todd,

Here's how Don calculated the average rates, and the data he used. The data is at the bottom of the email below.

Bryan

From: Anderson, Don - FSIS
Sent: Monday, November 16, 2015 11:11 AM
To: Maculloch, Bryan - FSIS; Pugliese, Andrew - FSIS; Furey, Todd M. - FSIS
Subject: OSHA Hogs

This document compares the OSHA case rates in the 5 HIMP plants to TWO different "comparison sets" of plants.

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Don Anderson
Management Control and Audit Division
Office of Investigation, Enforcement & Audit

Food Safety and Inspection Service- USDA
202-821-9396

From: [Maculloch, Bryan - FSIS](#)
To: [Pugliese, Andrew - FSIS](#)
Subject: FW: swine slaughter volumes
Date: Tuesday, February 27, 2018 2:09:54 PM

From: Anderson, Don - FSIS

Sent: Friday, November 13, 2015 2:38 PM

To: Maculloch, Bryan - FSIS <Bryan.Maculloch@fsis.usda.gov>; Pugliese, Andrew - FSIS <Andrew.Pugliese@fsis.usda.gov>; Furey, Todd M. - FSIS <Todd.Furey2@fsis.usda.gov>

Subject: swine slaughter volumes

Regarding selecting a subset of “traditional” plants to better compare with HIMP plants.

Remember, there are now 56 plants in the “osha” data set- 5 HIMP and 51 Traditional

Using the 2012 slaughter data Bryan forwarded me, note that the mean annual slaughter volume is about 1.2 million head, but with a big SD

Descriptive Statistics					
	N	Minimum	Maximum	Mean	Std. Deviation
2012SwineHead	56	12	7,901,152	1,202,262.84	2,014,099.205
Valid N (listwise)	56				

In the figure below, I have EXCLUDED 27 plants that slaughtered fewer than 100,000 head in 2012 (all excluded plants are traditional, not HIMP).

Thus, the 29 plants below (5 HIMP and 24 Traditional) have slaughter volumes equal to or higher than 100,000 head.

You can see the HIMP plants in Red, and the 24 traditional plants in Blue.

I think we could easily make a case for excluding the 27 lowest-volume plants that I already have.

(b) (5)

(b) (5)

The top of the page contains three horizontal black bars of varying lengths, indicating redacted information. The first bar is the longest, followed by a slightly shorter one, and then a much shorter one on the left side.

Don Anderson
Management Control and Audit Division
Office of Investigation, Enforcement & Audit

Food Safety and Inspection Service- USDA
202-821-9396

From: [Anderson, Don - FSIS](#)
To: [Macculloch, Bryan - FSIS](#); [Pugliese, Andrew - FSIS](#); [Furey, Todd M. - FSIS](#)
Subject: OSHA Hogs
Date: Monday, November 16, 2015 11:11:01 AM
Attachments: [One Hundred Thousand and One Million Hogs.docx](#)
[osha data modified comparison plants 2012 slaughter.xlsx](#)

This document compares the OSHA case rates in the 5 HIMP plants to TWO different “comparison sets” of plants.

On page 1, the comparison group is 24 Traditional Plants that slaughter at least 100,000 Swine.

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Don Anderson
Management Control and Audit Division
Office of Investigation, Enforcement & Audit

Food Safety and Inspection Service- USDA
202-821-9396

Group Statistics Establishments Over 100,000 Head

		Obs/Yrs	Mean	Std. Deviation	Std. Error Mean
2012SwineHead	HIMP (5 plants)	24	3,165,410	1,381,477	281,993
	Traditional (24 plants)	119	1,926,069	2,290,391	209,960
TotalCaseRate	HIMP (5 plants)	24	10.46	5.62	1.15
	Traditional (24 plants)	119	16.38	9.15	0.84
DaysAwayTransferredRestricted	HIMP (5 plants)	24	6.61	3.77	0.77
	Traditional	119	10.16	7.23	0.66
DaysAwayFromWork	HIMP (5 plants)	24	1.00	0.74	0.15
	Traditional (24 plants)	119	2.61	2.17	0.20

Independent Samples Test Establishments Over 100,000 Head

		Levene's Test for Equality of Variances		t-test for Equality of Means			
		F	Sig.	t	df	Sig. (2-tailed)	Mean Difference
2012SwineHead	Equal variances assumed	9.749	.002	2.554	141	.012	1,239,341.49
	Equal variances not assumed			3.525	52.429	.001	1,239,341.49
TotalCaseRate	Equal variances assumed	5.503	.020	-3.050	141	.003	-5.92
	Equal variances not assumed			-4.165	51.308	.000	-5.92
DaysAwayTransferredRestricted	Equal variances assumed	6.980	.009	-2.340	141	.021	-3.55
	Equal variances not assumed			-3.497	62.936	.001	-3.55
DaysAwayFromWork	Equal variances assumed	11.593	.001	-3.588	141	.000	-1.62
	Equal variances not assumed			-6.450	108.261	.000	-1.62

Group Statistics Establishments Over 1 Million Head

		Obs/Yrs	Mean	Std. Deviation	Std. Error Mean
2012SwineHead	HIMP (5 plants)	24	3,165,410	1,381,477	281,993
	Traditional (10 plants)	49	4,227,168	1,911,402	273,057
TotalCaseRate	HIMP (5 plants)	24	10.46	5.62	1.15
	Traditional (10 plants)	49	18.09	11.37	1.62
DaysAwayTransferredRestricted	HIMP (5 plants)	24	6.61	3.77	0.77
	Traditional	49	11.35	8.72	1.25
DaysAwayFromWork	HIMP (5 plants)	24	1.00	0.74	0.15
	Traditional (10 plants)	49	1.77	1.35	0.19

Independent Samples Test Establishments Over 1 Million Head

		Levene's Test for Equality of Variances		t-test for Equality of Means			
		F	Sig.	t	df	Sig. (2-tailed)	Mean Difference
2012SwineHead	Equal variances assumed	1.217	.274	-2.425	71	.018	-1,061,757.28
	Equal variances not assumed			-2.705	60.757	.009	-1,061,757.28
TotalCaseRate	Equal variances assumed	20.992	.000	-3.099	71	.003	-7.63
	Equal variances not assumed			-3.837	70.974	.000	-7.63
DaysAwayTransferredRestricted	Equal variances assumed	14.492	.000	-2.539	71	.013	-4.74
	Equal variances not assumed			-3.233	70.277	.002	-4.74
DaysAwayFromWork	Equal variances assumed	17.242	.000	-2.623	71	.011	-0.77
	Equal variances not assumed			-3.162	69.884	.002	-0.77

Billing Code 3410-DM-P

DEPARTMENT OF AGRICULTURE

Food Safety and Inspection Service

9 CFR Parts 301, 309, and 310

[Docket No. FSIS-2016-0017]

RIN 0583-AD62

Modernization of Swine Slaughter Inspection

AGENCY: Food Safety and Inspection Service, USDA.

ACTION: Proposed Rule.

D. Overview of the Proposed Rule's NSIS

Eight of the proposed rule's provisions apply to only those establishments that voluntarily participate in the NSIS. Meeting these provisions will likely increase an establishment's labor and training costs. Additionally, only market hogs are eligible to participate in the NSIS. Due to these economic constraints discussed above, we expect that only large and small high volume establishments that exclusively slaughter market hogs would voluntarily participate in the NSIS. In 2016 there were 40 high volume establishments that exclusively slaughter market hogs, 27

large¹ (5 HIMP + 22 non-HIMP)² and 13 small establishments, Table 4. These establishments account for 92 percent of total swine slaughter, Table 4. Given their large share of the market and the ability to slaughter a sufficient amount of market hogs to justify the likely costs associated with NSIS, these establishments are expected to voluntarily implement the proposed NSIS. Therefore, this analysis calculates the costs and benefits associated with the voluntary provisions for these 40 market hog establishments. However, because the 5 HIMP establishments are already practicing the proposed NSIS methods, they are not expected to incur any additional new costs nor contribute to any increase in quantified benefits associated with adopting the NSIS.

¹ HACCP size: Very Small Establishment = Less than 10 employees or less than \$2.5 million in annual sales; Small Establishment = 10-499 employees; Large Establishment = 500 or more employees.

² In 2016 there was 1 large establishment that did not exclusively slaughter market hogs.

Brook, Mark - FSIS

From: Pugliese, Andrew - FSIS
Sent: Thursday, July 27, 2017 2:02 PM
To: Hammar, Melissa - FSIS
Subject: RE: Swine modernization - FSIS Staffing

Thank you for keeping me in the loop. This doesn't change anything on my side.

From: Hammar, Melissa - FSIS
Sent: Thursday, July 27, 2017 1:56 PM
To: Pugliese, Andrew - FSIS
Subject: FW: Swine modernization - FSIS Staffing

FYI. (b) (5)



From: Wagner, Roberta - FSIS
Sent: Wednesday, July 26, 2017 5:04 PM
To: Hammar, Melissa - FSIS
Cc: Edelstein, Rachel - FSIS
Subject: Re: Swine modernization - FSIS Staffing

I think that is fine for proposal -

Sent from my iPhone

On Jul 26, 2017, at 2:37 PM, Hammar, Melissa - FSIS <Melissa.Hammar@fsis.usda.gov> wrote:

(b) (5)




(b) (5)

From: Sidrak, Hany - FSIS

Sent: Wednesday, July 26, 2017 1:25 PM

To: Wagner, Roberta - FSIS; Edelstein, Rachel - FSIS; Michael, Matthew - FSIS; Hammar, Melissa - FSIS

Cc: Smith, William C. - FSIS; Kiecker, Paul - FSIS; Gilmore, Keith - FSIS

Subject: FW: Swine modernization - FSIS Staffing

(b) (5)

Happy to further discuss. Thank you. Hany

From: Hammar, Melissa - FSIS

Sent: Tuesday, July 25, 2017 10:58 AM

To: Sidrak, Hany - FSIS

Cc: Edelstein, Rachel - FSIS; Wagner, Roberta - FSIS; Michael, Matthew - FSIS

Subject: RE: Swine modernization: 1-3 online inspectors

(b) (5)

From: Hammar, Melissa - FSIS

Sent: Tuesday, July 25, 2017 10:27 AM

To: Sidrak, Hany - FSIS

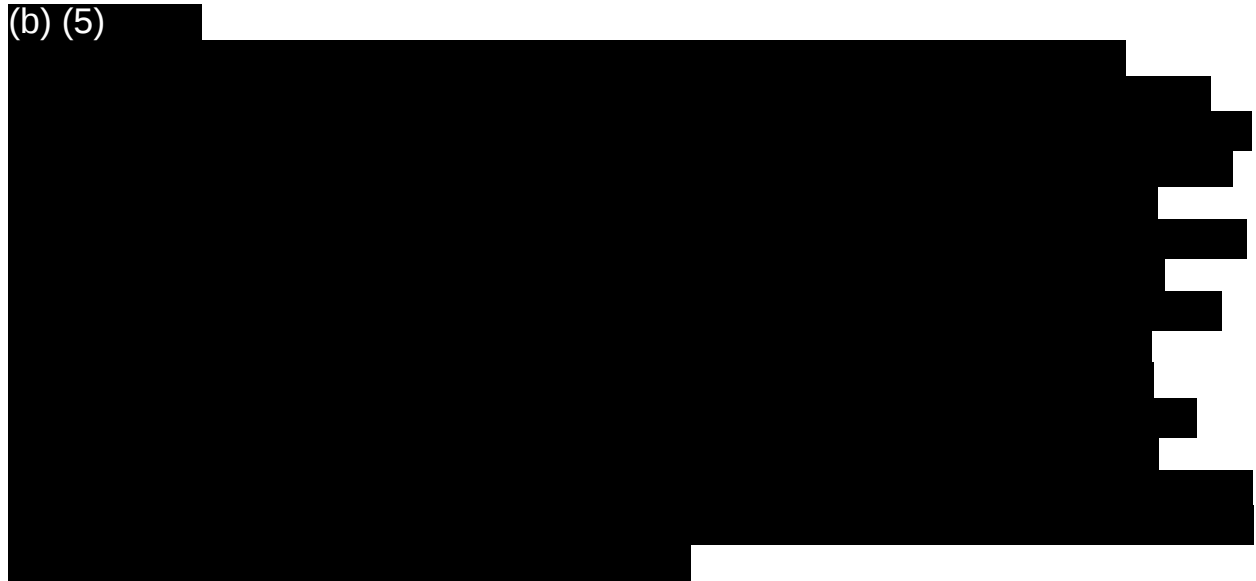
Cc: Edelstein, Rachel - FSIS; Wagner, Roberta - FSIS; Michael, Matthew - FSIS

Subject: Swine modernization: 1-3 online inspectors

Hi Hany,

As requested, here's the section of the preamble that talks about how FSIS may assign 1-3 inspectors per line.

(b) (5)



Brook, Mark - FSIS

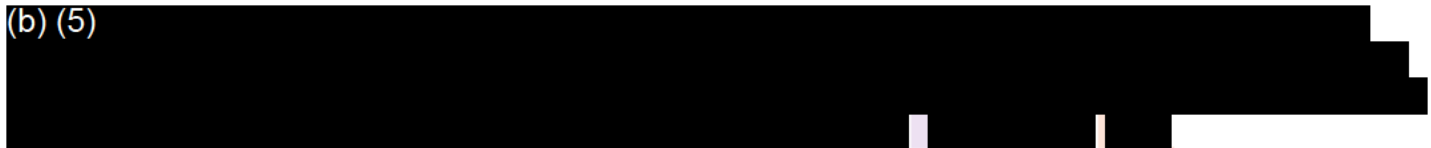
From: Sidrak, Hany - FSIS
Sent: Tuesday, August 23, 2016 5:43 PM
To: Hammar, Melissa - FSIS
Cc: Vermeersch, Thomas - FSIS; Pugliese, Andrew - FSIS; Volk, Lisa - FSIS
Subject: RE: NSIS staffing

(b) (5)



From: Hammar, Melissa - FSIS
Sent: Tuesday, August 23, 2016 10:19 AM
To: Sidrak, Hany - FSIS
Cc: Vermeersch, Thomas - FSIS; Pugliese, Andrew - FSIS
Subject: NSIS staffing

(b) (5)






Melissa Hammar
Program Analyst
USDA/FSIS/OPPD/IS
Phone: (202) 720-2096
Fax: (202) 690-0486

Establishment ID	Size or HACCP Processing Size	Volume
31	Very Small	Low Volume
86	Very Small	Low Volume
93	Very Small	Low Volume
506	Small	High Volume
136	Very Small	Low Volume
678	Small	Low Volume
162	Very Small	Low Volume
233	Very Small	Low Volume
242	Very Small	Low Volume
334	Very Small	Low Volume
378	Very Small	Low Volume
382	Very Small	Low Volume
383	Very Small	Low Volume
1886	Small	High Volume
428	Very Small	Low Volume
439	Very Small	Low Volume
447	Very Small	Low Volume
1987	Small	High Volume
557	Large	High Volume
560	Large	High Volume
2019	Small	High Volume
2540	Small	High Volume
650	Very Small	Low Volume
2606	Small	High Volume
3425	Small	High Volume
681	Very Small	Low Volume
699	Very Small	Low Volume
728	Large	High Volume
3503	Small	High Volume
765	Very Small	Low Volume
789	Very Small	Low Volume
3645	Small	High Volume
796	Very Small	Low Volume
4355	Small	High Volume
936	Very Small	Low Volume
940	Very Small	Low Volume
941	Very Small	Low Volume
949	Very Small	Low Volume
1028	Very Small	Low Volume
1031	Very Small	Low Volume
1033	Very Small	Low Volume
1040	Very Small	Low Volume
1050	Very Small	Low Volume
1051	Very Small	Low Volume
1052	Very Small	Low Volume
1054	Very Small	Low Volume
1098	Very Small	Low Volume

4498	Small	Low Volume
1232	Very Small	Low Volume
1260	Very Small	High Volume
1304	Very Small	Low Volume
1317	Very Small	Low Volume
1320	Very Small	Low Volume
1376	Very Small	Low Volume
4642	Small	High Volume
1450	Very Small	Low Volume
1505	Very Small	Low Volume
1617	Very Small	Low Volume
1629	Very Small	Low Volume
1655	Very Small	Low Volume
1657	Very Small	Low Volume
4669	Small	High Volume
1697	Very Small	Low Volume
1705	Very Small	Low Volume
1767	Very Small	Low Volume
1770	Very Small	Low Volume
1777	Very Small	Low Volume
1787	Very Small	Low Volume
4680	Small	High Volume
6690	Small	High Volume
1801	Very Small	Low Volume
1802	Very Small	Low Volume
1865	Very Small	Low Volume
6981	Small	High Volume
7009	Small	High Volume
1892	Large	High Volume
1919	Very Small	Low Volume
1928	Very Small	Low Volume
1967	Very Small	Low Volume
1971	Very Small	Low Volume
7239	Small	High Volume
2007	Very Small	Low Volume
8322	Small	High Volume
2332	Small	Low Volume
2043	Very Small	Low Volume
1213	Small	High Volume
2060	Very Small	Low Volume
2061	Very Small	Low Volume
2066	Very Small	Low Volume
2079	Very Small	Low Volume
2082	Very Small	Low Volume
2114	Very Small	Low Volume
2144	Very Small	Low Volume
2189	Very Small	Low Volume
2198	Very Small	Low Volume

2224	Large	High Volume
2304	Very Small	Low Volume
2328	Very Small	Low Volume
923	Small	Low Volume
2339	Very Small	Low Volume
2340	Very Small	Low Volume
2348	Very Small	Low Volume
2360	Very Small	Low Volume
2361	Very Small	Low Volume
4750	Small	High Volume
2374	Very Small	Low Volume
2377	Very Small	Low Volume
2379	Very Small	Low Volume
2389	Very Small	Low Volume
2390	Very Small	Low Volume
2391	Very Small	Low Volume
2394	Very Small	Low Volume
2411	Very Small	Low Volume
2451	Very Small	Low Volume
2478	Large	High Volume
2484	Large	High Volume
2506	Large	High Volume
736	Small	High Volume
9777	Small	Low Volume
2558	Very Small	Low Volume
95	Small	Low Volume
2600	Very Small	High Volume
2602	Very Small	Low Volume
3307	Small	High Volume
2632	Very Small	Low Volume
2633	Very Small	Low Volume
11293	Small	Low Volume
124071	Small	Low Volume
2679	Large	High Volume
2691	Very Small	High Volume
1666	Small	Low Volume
2727	Very Small	Low Volume
2744	Very Small	Low Volume
2936	Large	High Volume
2951	Large	High Volume
2979	Large	High Volume
2998	Very Small	Low Volume
3005	Very Small	Low Volume
3006	Very Small	Low Volume
3037	Very Small	Low Volume
3042	Very Small	Low Volume
3050	Very Small	Low Volume
3051	Very Small	Low Volume

3053	Very Small	Low Volume
3055	Very Small	Low Volume
3057	Very Small	Low Volume
3059	Very Small	Low Volume
3062	Very Small	Low Volume
3063	Very Small	Low Volume
3075	Very Small	Low Volume
3085	Very Small	Low Volume
3101	Very Small	Low Volume
3102	Very Small	Low Volume
3108	Very Small	Low Volume
3111	Very Small	Low Volume
3116	Very Small	Low Volume
3118	Very Small	Low Volume
3123	Very Small	Low Volume
3131	Very Small	Low Volume
3169	Very Small	Low Volume
3228	Large	High Volume
3234	Large	High Volume
3235	Large	High Volume
3236	Large	High Volume
3239	Large	High Volume
3247	Large	High Volume
3251	Large	High Volume
3252	Large	High Volume
619	Small	Low Volume
3272	Large	High Volume
3274	Large	High Volume
3298	Very Small	Low Volume
3304	Very Small	Low Volume
2366	Small	Low Volume
3311	Very Small	Low Volume
3316	Very Small	Low Volume
1788	Small	Low Volume
3384	Very Small	Low Volume
3392	Very Small	Low Volume
3396	Very Small	Low Volume
3397	Very Small	Low Volume
3403	Very Small	Low Volume
3411	Very Small	Low Volume
5116	Small	High Volume
4237	Small	Low Volume
7069	Small	Low Volume
3530	Very Small	Low Volume
3537	Large	High Volume
3557	Very Small	Low Volume
8664	Small	High Volume
3601	Very Small	Low Volume

3602	Very Small	Low Volume
3604	Very Small	Low Volume
3614	Very Small	Low Volume
3616	Very Small	Low Volume
3624	Very Small	Low Volume
4345	Small	Low Volume
8091	Small	High Volume
3654	Very Small	Low Volume
3659	Very Small	Low Volume
3660	Very Small	Low Volume
3663	Very Small	Low Volume
3668	Very Small	Low Volume
3677	Very Small	Low Volume
3700	Very Small	Low Volume
3711	Very Small	Low Volume
3714	Very Small	Low Volume
3717	Very Small	Low Volume
3721	Very Small	Low Volume
3736	Very Small	Low Volume
3743	Very Small	Low Volume
3745	Very Small	Low Volume
3773	Very Small	Low Volume
3819	Very Small	Low Volume
3907	Large	High Volume
3958	Very Small	Low Volume
3987	Very Small	Low Volume
3996	Very Small	Low Volume
3998	Very Small	Low Volume
5138	Small	High Volume
422	Small	Low Volume
4013	Very Small	Low Volume
4065	Very Small	Low Volume
4127	Very Small	Low Volume
791	Small	High Volume
4238	Very Small	Low Volume
4406	Small	Low Volume
4308	Very Small	High Volume
4320	Very Small	Low Volume
4324	Very Small	Low Volume
6938	Small	High Volume
147	Small	Low Volume
2058	Small	Low Volume
123757	Small	Low Volume
8847	Small	High Volume
4519	Large	High Volume
4599	Very Small	Low Volume
4601	Very Small	Low Volume
4004	Small	Low Volume

2586	Small	High Volume
4661	Very Small	Low Volume
5291	Small	Low Volume
4674	Very Small	Low Volume
125275	Small	Low Volume
4683	Very Small	Low Volume
4717	Very Small	Low Volume
5404	Small	High Volume
4769	Very Small	Low Volume
4793	Very Small	Low Volume
4826	Very Small	Low Volume
4829	Very Small	Low Volume
4843	Very Small	Low Volume
4862	Very Small	Low Volume
4878	Very Small	Low Volume
4893	Very Small	Low Volume
4900	Very Small	Low Volume
4911	Very Small	Low Volume
4933	Very Small	Low Volume
4936	Very Small	Low Volume
4939	Very Small	Low Volume
4946	Very Small	Low Volume
4948	Very Small	Low Volume
4975	Very Small	Low Volume
4976	Very Small	Low Volume
4983	Very Small	Low Volume
4990	Very Small	Low Volume
5077	Very Small	High Volume
9555	Small	Low Volume
5118	Large	High Volume
6122	Small	Low Volume
5279	Very Small	Low Volume
126596	Small	Low Volume
5370	Very Small	Low Volume
5372	Very Small	Low Volume
6681	Small	Low Volume
5411	Very Small	Low Volume
1796	Small	Low Volume
3363	Small	High Volume
6047	Very Small	Low Volume
6088	Very Small	Low Volume
6095	Very Small	Low Volume
9289	Small	Low Volume
9367	Small	Low Volume
6120	Very Small	Low Volume
9140	Small	Low Volume
6125	Very Small	Low Volume
6126	Very Small	Low Volume

6131	Very Small	Low Volume
6134	Very Small	Low Volume
6147	Very Small	Low Volume
6149	Very Small	Low Volume
6171	Very Small	Low Volume
6172	Very Small	Low Volume
6174	Very Small	Low Volume
6181	Very Small	Low Volume
6201	Very Small	Low Volume
6204	Very Small	Low Volume
6207	Very Small	Low Volume
6368	Very Small	Low Volume
6369	Very Small	Low Volume
6408	Large	High Volume
6458	Very Small	Low Volume
6459	Very Small	Low Volume
6483	Very Small	Low Volume
6497	Very Small	Low Volume
6498	Very Small	Low Volume
6525	Very Small	Low Volume
6564	Very Small	Low Volume
6580	Very Small	Low Volume
6584	Very Small	Low Volume
6586	Very Small	Low Volume
6601	Very Small	Low Volume
6604	Very Small	Low Volume
6611	Very Small	Low Volume
6612	Very Small	Low Volume
6614	Very Small	Low Volume
6643	Very Small	Low Volume
6645	Very Small	Low Volume
6646	Very Small	Low Volume
6649	Very Small	Low Volume
6653	Very Small	Low Volume
6669	Very Small	Low Volume
6672	Very Small	Low Volume
6674	Very Small	Low Volume
6754	Small	Low Volume
6682	Very Small	Low Volume
670	Small	Low Volume
6696	Very Small	Low Volume
6697	Very Small	Low Volume
6700	Very Small	Low Volume
7669	Small	High Volume
6716	Very Small	Low Volume
6729	Very Small	Low Volume
6732	Very Small	Low Volume
6738	Very Small	Low Volume

6753	Very Small	Low Volume
3649	Small	Low Volume
6769	Very Small	Low Volume
6770	Very Small	Low Volume
6771	Very Small	Low Volume
6776	Very Small	Low Volume
6779	Very Small	Low Volume
6782	Very Small	Low Volume
6783	Very Small	Low Volume
6785	Very Small	Low Volume
6786	Very Small	Low Volume
6802	Very Small	Low Volume
6807	Very Small	Low Volume
6820	Very Small	Low Volume
6823	Very Small	Low Volume
6828	Very Small	Low Volume
6840	Very Small	Low Volume
6871	Very Small	Low Volume
6906	Very Small	Low Volume
2545	Small	High Volume
13686	Small	Low Volume
4611	Small	Low Volume
9537	Small	Low Volume
7119	Very Small	Low Volume
7125	Very Small	Low Volume
7128	Very Small	Low Volume
7130	Very Small	Low Volume
7133	Very Small	Low Volume
7152	Very Small	Low Volume
7155	Very Small	Low Volume
7164	Very Small	Low Volume
7173	Very Small	Low Volume
7179	Very Small	Low Volume
7190	Very Small	High Volume
7202	Very Small	Low Volume
3583	Small	Low Volume
7632	Very Small	Low Volume
7649	Very Small	Low Volume
7663	Very Small	Low Volume
9221	Small	Low Volume
7679	Very Small	Low Volume
7684	Very Small	Low Volume
7714	Very Small	Low Volume
7748	Very Small	Low Volume
7791	Very Small	Low Volume
7797	Very Small	Low Volume
7804	Very Small	Low Volume
6162362	Small	Low Volume

7824	Very Small	Low Volume
7846	Very Small	Low Volume
7962	Very Small	Low Volume
8053	Very Small	Low Volume
12294	Small	Low Volume
1383	Small	High Volume
4000	Small	Low Volume
8125	Very Small	Low Volume
8132	Very Small	Low Volume
8124	Small	Low Volume
8188	Very Small	Low Volume
8198	Very Small	Low Volume
8212	Very Small	Low Volume
8228	Very Small	Low Volume
8246	Very Small	Low Volume
8321	Very Small	Low Volume
126833	Small	Low Volume
8352	Very Small	Low Volume
8368	Very Small	Low Volume
8408	Very Small	Low Volume
8604	Very Small	Low Volume
6162073	Small	Low Volume
8692	Very Small	Low Volume
8830	Very Small	Low Volume
8844	Very Small	Low Volume
3259	Small	High Volume
8866	Very Small	Low Volume
8875	Very Small	Low Volume
8896	Very Small	Low Volume
8944	Very Small	Low Volume
8953	Very Small	Low Volume
9034	Very Small	Low Volume
9122	Very Small	Low Volume
9125	Very Small	Low Volume
9134	Very Small	Low Volume
6112	Small	Low Volume
9216	Very Small	Low Volume
2013	Small	Low Volume
7815	Small	Low Volume
9260	Very Small	Low Volume
9261	Very Small	Low Volume
12935	Small	Low Volume
9301	Very Small	Low Volume
9348	Very Small	Low Volume
9406	Small	Low Volume
6041	Small	High Volume
9414	Very Small	Low Volume
9415	Very Small	Low Volume

9462	Very Small	Low Volume
9496	Very Small	Low Volume
9497	Very Small	Low Volume
9510	Very Small	Low Volume
9518	Very Small	Low Volume
6111	Small	High Volume
645	Small	High Volume
9575	Very Small	Low Volume
9610	Very Small	Low Volume
9662	Very Small	Low Volume
9671	Very Small	Low Volume
9710	Very Small	Low Volume
1891	Small	High Volume
9793	Very Small	Low Volume
9824	Very Small	Low Volume
9844	Very Small	Low Volume
9846	Very Small	Low Volume
9876	Very Small	Low Volume
9879	Large	High Volume
10201	Very Small	Low Volume
10205	Very Small	Low Volume
10207	Very Small	Low Volume
10489	Very Small	Low Volume
11214	Very Small	Low Volume
2673	Small	Low Volume
11335	Very Small	Low Volume
11377	Very Small	Low Volume
11708	Very Small	Low Volume
11855	Very Small	Low Volume
12181	Very Small	Low Volume
12213	Very Small	Low Volume
12215	Very Small	Low Volume
12269	Very Small	Low Volume
2675	Small	High Volume
12310	Very Small	Low Volume
12326	Very Small	Low Volume
12384	Very Small	Low Volume
12421	Very Small	Low Volume
12427	Very Small	Low Volume
12450	Very Small	Low Volume
12541	Very Small	Low Volume
12604	Very Small	Low Volume
12816	Very Small	Low Volume
12870	Very Small	Low Volume
12910	Very Small	Low Volume
2713	Small	High Volume
12938	Very Small	Low Volume
12974	Very Small	Low Volume

13070	Very Small	Low Volume
13125	Very Small	Low Volume
13181	Very Small	Low Volume
13329	Very Small	Low Volume
13357	Very Small	Low Volume
13365	Very Small	Low Volume
13385	Very Small	Low Volume
13410	Very Small	Low Volume
13494	Very Small	Low Volume
13542	Very Small	Low Volume
13553	Very Small	Low Volume
13582	Very Small	Low Volume
13605	Very Small	Low Volume
13631	Very Small	Low Volume
13645	Very Small	Low Volume
13658	Very Small	Low Volume
3527	Small	High Volume
13750	Very Small	Low Volume
13761	Very Small	Low Volume
13771	Very Small	Low Volume
13821	Very Small	Low Volume
13839	Very Small	Low Volume
13859	Very Small	Low Volume
13882	Very Small	Low Volume
13890	Very Small	Low Volume
13902	Very Small	Low Volume
13911	Very Small	Low Volume
13926	Very Small	Low Volume
13959	Very Small	Low Volume
13979	Very Small	Low Volume
14012	Very Small	Low Volume
14016	Very Small	Low Volume
14041	Very Small	Low Volume
14043	Very Small	Low Volume
14058	Very Small	Low Volume
14059	Very Small	Low Volume
14096	Very Small	Low Volume
100024	Very Small	Low Volume
100129	Very Small	Low Volume
100194	Very Small	Low Volume
100275	Very Small	Low Volume
100370	Very Small	Low Volume
100462	Very Small	Low Volume
123313	Very Small	Low Volume
123331	Very Small	Low Volume
123344	Very Small	Low Volume
123352	Very Small	Low Volume
123389	Very Small	Low Volume

123402	Very Small	Low Volume
4247	Small	Low Volume
123466	Very Small	Low Volume
123530	Very Small	Low Volume
123616	Very Small	Low Volume
123623	Very Small	Low Volume
123639	Very Small	Low Volume
123640	Very Small	Low Volume
123645	Very Small	Low Volume
123646	Very Small	Low Volume
123662	Very Small	Low Volume
4427	Small	High Volume
123763	Very Small	Low Volume
123827	Very Small	Low Volume
123936	Very Small	Low Volume
124019	Very Small	Low Volume
5932	Small	High Volume
124146	Very Small	Low Volume
124195	Very Small	Low Volume
124250	Very Small	Low Volume
124267	Very Small	Low Volume
124455	Very Small	Low Volume
124458	Very Small	Low Volume
124528	Very Small	Low Volume
124562	Very Small	Low Volume
124583	Very Small	Low Volume
124584	Very Small	Low Volume
125097	Very Small	Low Volume
6710	Small	High Volume
125776	Very Small	Low Volume
125780	Very Small	Low Volume
125868	Very Small	Low Volume
126029	Very Small	Low Volume
126481	Very Small	Low Volume
126544	Very Small	Low Volume
126548	Very Small	Low Volume
126569	Very Small	Low Volume
126575	Very Small	Low Volume
8103	Small	High Volume
126601	Very Small	Low Volume
126679	Very Small	Low Volume
126746	Very Small	Low Volume
126782	Very Small	Low Volume
126789	Very Small	Low Volume
126804	Very Small	Low Volume
126812	Very Small	Low Volume
126828	Very Small	Low Volume
8183	Small	High Volume

126865	Very Small	Low Volume
126887	Very Small	Low Volume
9256	Small	High Volume
126973	Very Small	Low Volume
126990	Very Small	Low Volume
127053	Very Small	Low Volume
127058	Very Small	Low Volume
127065	Very Small	Low Volume
127084	Very Small	Low Volume
127141	Very Small	Low Volume
127154	Very Small	Low Volume
127169	Very Small	Low Volume
127184	Very Small	Low Volume
127206	Very Small	Low Volume
127262	Very Small	Low Volume
127273	Very Small	Low Volume
127296	Very Small	Low Volume
127319	Very Small	Low Volume
127335	Very Small	Low Volume
127338	Very Small	Low Volume
127364	Very Small	Low Volume
123433	Small	High Volume
127446	Very Small	Low Volume
126947	Small	Low Volume
6162126	Very Small	Low Volume
6162141	Very Small	Low Volume
6162162	Very Small	Low Volume
6162166	Very Small	Low Volume
6162337	Very Small	Low Volume
127387	Small	Low Volume
6162403	Very Small	Low Volume
6162533	Very Small	Low Volume
6162614	Very Small	Low Volume
6162663	Small	High Volume
6162680	Very Small	Low Volume
6162863	Very Small	Low Volume
6163009	Very Small	Low Volume

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EstID	EstNbr	Name	Year	TYPE
1891	M818	J. H. Routh Packing Company	2002	Traditional
1891	M818	J. H. Routh Packing Company	2003	Traditional
1891	M818	J. H. Routh Packing Company	2004	Traditional
1891	M818	J. H. Routh Packing Company	2008	Traditional
2478	M85B	Cargill Meat Solutions Corp.	2008	HIMP
2478	M85B	Cargill Meat Solutions Corp.	2007	HIMP
2478	M85B	Cargill Meat Solutions Corp.	2009	HIMP
2586	M2926	Pork King Packing, Inc.	2007	Traditional
2586	M2926	Pork King Packing, Inc.	2009	Traditional
2606	M6775	Calihan Pork Processors	2007	Traditional
2606	M6775	Calihan Pork Processors	2006	Traditional
2606	M6775	Calihan Pork Processors	2008	Traditional
2606	M6775	Calihan Pork Processors	2009	Traditional
2713	M19185	Spectrum Preferred Meats, Inc	2006	Traditional
2713	M19185	Spectrum Preferred Meats, Inc	2003	Traditional
2713	M19185	Spectrum Preferred Meats, Inc	2007	Traditional
2713	M19185	Spectrum Preferred Meats, Inc	2004	Traditional
2713	M19185	Spectrum Preferred Meats, Inc	2002	Traditional
2713	M19185	Spectrum Preferred Meats, Inc	2009	Traditional
2979	M1620	Quality Pork Processors, Inc.	2002	HIMP
2979	M1620	Quality Pork Processors, Inc.	2003	HIMP
2979	M1620	Quality Pork Processors, Inc.	2005	HIMP
2979	M1620	Quality Pork Processors, Inc.	2004	HIMP
2979	M1620	Quality Pork Processors, Inc.	2006	HIMP
3247	M199N	Hormel Foods Corp.	2004	HIMP
3247	M199N	Hormel Foods Corp.	2005	HIMP
3247	M199N	Hormel Foods Corp.	2007	HIMP
3247	M199N	Hormel Foods Corp.	2003	HIMP
3247	M199N	Hormel Foods Corp.	2008	HIMP
3259	M363	Verschoor Meats, Inc.	2003	Traditional
3259	M363	Verschoor Meats, Inc.	2002	Traditional
3259	M363	Verschoor Meats, Inc.	2006	Traditional
3259	M363	Verschoor Meats, Inc.	2004	Traditional
3259	M363	Verschoor Meats, Inc.	2007	Traditional
4669	M8314	Swaggerty Sausage Company, Inc.	2007	Traditional
4669	M8314	Swaggerty Sausage Company, Inc.	2006	Traditional
4669	M8314	Swaggerty Sausage Company, Inc.	2008	Traditional
4669	M8314	Swaggerty Sausage Company, Inc.	2003	Traditional
4669	M8314	Swaggerty Sausage Company, Inc.	2002	Traditional
4669	M8314	Swaggerty Sausage Company, Inc.	2005	Traditional
4669	M8314	Swaggerty Sausage Company, Inc.	2009	Traditional
5118	M360	Clougherty Packing LLC	2005	HIMP
5118	M360	Clougherty Packing LLC	2007	HIMP
5118	M360	Clougherty Packing LLC	2006	HIMP
5118	M360	Clougherty Packing LLC	2002	HIMP
5118	M360	Clougherty Packing LLC	2004	HIMP
5118	M360	Clougherty Packing LLC	2003	HIMP
5138	M548	Yosemite Meat & Locker Service	2003	Traditional

5138	M548	Yosemite Meat & Locker Service	2008	Traditional
5138	M548	Yosemite Meat & Locker Service	2009	Traditional
5138	M548	Yosemite Meat & Locker Service	2010	Traditional
5138	M548	Yosemite Meat & Locker Service	2007	Traditional
5138	M548	Yosemite Meat & Locker Service	2006	Traditional
5932	M226	Independent Meat Company	2006	Traditional
5932	M226	Independent Meat Company	2002	Traditional
5932	M226	Independent Meat Company	2008	Traditional
5932	M226	Independent Meat Company	2007	Traditional
5932	M226	Independent Meat Company	2010	Traditional
5932	M226	Independent Meat Company	2003	Traditional
5932	M226	Independent Meat Company	2005	Traditional
5932	M226	Independent Meat Company	2009	Traditional
5932	M226	Independent Meat Company	2004	Traditional
5932	M226	Independent Meat Company	2011	Traditional
6408	M791	Clemens Food Group, LLC	2005	HIMP
6408	M791	Clemens Food Group, LLC	2004	HIMP
6408	M791	Clemens Food Group, LLC	2006	HIMP
6408	M791	Clemens Food Group, LLC	2003	HIMP
6408	M791	Clemens Food Group, LLC	2002	HIMP
6710	M9520	Leidys, Inc.	2003	Traditional
6710	M9520	Leidys, Inc.	2002	Traditional
6710	M9520	Leidys, Inc.	2005	Traditional
6710	M9520	Leidys, Inc.	2007	Traditional
6710	M9520	Leidys, Inc.	2004	Traditional
6710	M9520	Leidys, Inc.	2006	Traditional
6710	M9520	Leidys, Inc.	2008	Traditional
7009	M1962	Johnsonville Sausage, LLC	2003	Traditional
7239	M15896	Abbyland Pork Pack, Inc.	2004	Traditional
7239	M15896	Abbyland Pork Pack, Inc.	2005	Traditional
7239	M15896	Abbyland Pork Pack, Inc.	2007	Traditional
7239	M15896	Abbyland Pork Pack, Inc.	2008	Traditional
7239	M15896	Abbyland Pork Pack, Inc.	2006	Traditional
7239	M15896	Abbyland Pork Pack, Inc.	2009	Traditional
7669	M21179	J& J Packing Co., Inc.	2009	Traditional
8103	M21069	Premium Iowa Pork, LLC	2004	Traditional
8103	M21069	Premium Iowa Pork, LLC	2009	Traditional
8103	M21069	Premium Iowa Pork, LLC	2006	Traditional
8103	M21069	Premium Iowa Pork, LLC	2010	Traditional
8103	M21069	Premium Iowa Pork, LLC	2007	Traditional
8103	M21069	Premium Iowa Pork, LLC	2005	Traditional
8664	M21898	Dakota Pack, Inc.	2008	Traditional
8664	M21898	Dakota Pack, Inc.	2010	Traditional
8664	M21898	Dakota Pack, Inc.	2009	Traditional
8664	M21898	Dakota Pack, Inc.	2011	Traditional
8664	M21898	Dakota Pack, Inc.	2007	Traditional
3363	M5537	Sioux-Preme Packing Co.	2004	Traditional
3363	M5537	Sioux-Preme Packing Co.	2002	Traditional
3363	M5537	Sioux-Preme Packing Co.	2003	Traditional

3363	M5537	Sioux-Preme Packing Co.	2006	Traditional
3363	M5537	Sioux-Preme Packing Co.	2007	Traditional
3363	M5537	Sioux-Preme Packing Co.	2005	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2006	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2007	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2008	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2004	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2005	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2003	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2011	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2010	Traditional
3235	M244L	Tyson Fresh Meats, Inc.	2009	Traditional
2484	M244I	Tyson Fresh Meats, Inc	2007	Traditional
2484	M244I	Tyson Fresh Meats, Inc	2005	Traditional
2484	M244I	Tyson Fresh Meats, Inc	2006	Traditional
2484	M244I	Tyson Fresh Meats, Inc	2009	Traditional
2484	M244I	Tyson Fresh Meats, Inc	2010	Traditional
2484	M244I	Tyson Fresh Meats, Inc	2011	Traditional
2679	M17564	Indiana Packers Corporation	2002	Traditional
2679	M17564	Indiana Packers Corporation	2007	Traditional
3234	M244	Tyson Fresh Meats, inc.	2011	Traditional
2936	M17D	John Morrell & Co.	2002	Traditional
2936	M17D	John Morrell & Co.	2007	Traditional
2936	M17D	John Morrell & Co.	2005	Traditional
2936	M17D	John Morrell & Co.	2003	Traditional
2936	M17D	John Morrell & Co.	2008	Traditional
2936	M17D	John Morrell & Co.	2004	Traditional
2936	M17D	John Morrell & Co.	2009	Traditional
3228	M85O	Cargill Meat Solutions Corporation	2007	Traditional
3228	M85O	Cargill Meat Solutions Corporation	2008	Traditional
3228	M85O	Cargill Meat Solutions Corporation	2009	Traditional
3228	M85O	Cargill Meat Solutions Corporation	2006	Traditional
3228	M85O	Cargill Meat Solutions Corporation	2010	Traditional
3907	M13597	Seaboard Foods	2002	Traditional
3907	M13597	Seaboard Foods	2003	Traditional
3907	M13597	Seaboard Foods	2006	Traditional
3907	M13597	Seaboard Foods	2005	Traditional
9879	M31965	Triumph Foods	2006	Traditional
9879	M31965	Triumph Foods	2007	Traditional
9879	M31965	Triumph Foods	2009	Traditional
9879	M31965	Triumph Foods	2008	Traditional
728	M18079	Smithfield Farmland Corp.	2006	Traditional
728	M18079	Smithfield Farmland Corp.	2008	Traditional
728	M18079	Smithfield Farmland Corp.	2005	Traditional
728	M18079	Smithfield Farmland Corp.	2009	Traditional
728	M18079	Smithfield Farmland Corp.	2007	Traditional

Comparison Group	Swine_2012	TCR	DART	DAWII	Circuit	Is430	Size
100,000	(b)(4)	18.030	11.300	5.500	5032	Yes	Small
100,000		15.960	6.880	2.500	5032	Yes	Small
100,000		10.970	5.630	2.660	5032	Yes	Small
100,000		9.550	3.290	2.300	5032	Yes	Small
1		15.930	11.000	0.120	5007	No	Large
1		17.060	10.160	0.130	5007	No	Large
1		10.500	5.970	0.040	5007	No	Large
100,000		2.350	2.350	2.350	5004	No	Small
100,000		1.170	1.170	1.170	5004	No	Small
100,000		22.800	17.100	2.850	5007	No	Small
100,000		22.150	13.290	4.430	5007	No	Small
100,000		21.550	10.770	8.080	5007	No	Small
100,000		12.540	3.760	1.250	5007	No	Small
100,000		10.370	8.890	4.440	5005	No	Small
100,000		11.050	6.900	4.140	5005	No	Small
100,000		4.740	4.740	1.580	5005	No	Small
100,000		13.460	4.480	2.990	5005	No	Small
100,000		9.280	0.000	0.000	5005	No	Small
100,000		3.300	0.000	0.000	5005	No	Small
1		14.840	9.590	0.600	2531	No	Large
1		11.680	8.030	0.890	2531	No	Large
1		10.090	7.370	0.500	2531	No	Large
1		9.500	6.620	0.430	2531	No	Large
1		7.980	5.650	0.560	2531	No	Large
1		10.880	6.700	1.800	1516	Yes	Large
1		7.830	5.220	1.160	1516	Yes	Large
1		6.480	4.490	0.990	1516	Yes	Large
1		9.040	4.260	1.300	1516	Yes	Large
1		5.560	2.910	0.330	1516	Yes	Large
100,000		34.100	25.980	1.620	2523	No	Small
100,000		14.630	14.630	1.460	2523	No	Small
100,000		21.410	11.890	4.750	2523	No	Small
100,000		15.350	4.180	0.000	2523	No	Small
100,000		13.460	3.670	3.670	2523	No	Small
100,000		13.860	13.860	2.770	9021	No	Small
100,000		9.890	9.890	4.940	9021	No	Small
100,000		10.120	7.590	1.260	9021	No	Small
100,000		20.780	7.550	7.550	9021	No	Small
100,000		13.510	6.750	6.750	9021	No	Small
100,000		8.380	6.280	6.280	9021	No	Small
100,000		8.980	5.050	1.120	9021	No	Small
1		6.270	3.750	1.090	503	Yes	Large
1		3.750	2.630	0.350	503	Yes	Large
1		4.260	2.070	0.300	503	Yes	Large
1		3.390	1.960	1.430	503	Yes	Large
1		3.250	1.230	0.910	503	Yes	Large
1		2.220	1.020	0.420	503	Yes	Large
100,000		26.020	23.910	13.360	509	No	Small

100,000	15.610	13.110	1.870	509	No	Small
100,000	9.050	7.240	1.810	509	No	Small
100,000	6.860	6.230	1.240	509	No	Small
100,000	6.180	4.330	0.610	509	No	Small
100,000	6.970	3.800	0.630	509	No	Small
100,000	24.570	24.570	7.670	1507	Yes	Small
100,000	21.810	21.810	7.690	1507	Yes	Small
100,000	18.980	18.980	7.670	1507	Yes	Small
100,000	17.730	17.730	3.850	1507	Yes	Small
100,000	20.140	16.430	6.360	1507	Yes	Small
100,000	16.550	15.720	4.960	1507	Yes	Small
100,000	16.140	15.680	2.300	1507	Yes	Small
100,000	14.090	14.090	5.030	1507	Yes	Small
100,000	14.180	13.270	4.110	1507	Yes	Small
100,000	19.210	12.060	3.570	1507	Yes	Small
1	17.700	13.040	2.110	6060	Yes	Large
1	19.070	12.580	2.100	6060	Yes	Large
1	15.950	11.620	1.890	6060	Yes	Large
1	17.030	10.670	1.880	6060	Yes	Large
1	20.760	10.100	2.620	6060	Yes	Large
100,000	22.110	14.740	3.860	6060	Yes	Small
100,000	19.290	11.920	2.100	6060	Yes	Small
100,000	14.430	11.340	1.030	6060	Yes	Small
100,000	15.430	10.400	1.340	6060	Yes	Small
100,000	13.620	9.530	1.700	6060	Yes	Small
100,000	14.630	7.650	0.990	6060	Yes	Small
100,000	10.360	6.020	2.000	6060	Yes	Small
100,000	7.520	3.760	1.880	2530	No	Small
100,000	20.310	14.440	6.320	2519	No	Small
100,000	16.090	9.940	3.310	2519	No	Small
100,000	18.090	7.420	1.850	2519	No	Small
100,000	15.480	7.140	5.160	2519	No	Small
100,000	16.170	6.060	3.230	2519	No	Small
100,000	16.120	4.920	3.130	2519	No	Small
100,000	0.000	0.000	0.000	4030	No	Small
100,000	23.470	10.950	3.120	2525	No	Small
100,000	12.510	8.750	1.870	2525	No	Small
100,000	17.820	6.480	4.860	2525	No	Small
100,000	14.360	6.440	1.480	2525	No	Small
100,000	8.040	3.090	1.230	2525	No	Small
100,000	11.670	2.120	1.060	2525	No	Small
100,000	28.030	14.010	1.860	2515	No	Small
100,000	27.830	11.710	4.390	2515	No	Small
100,000	27.720	9.240	1.540	2515	No	Small
100,000	10.820	6.010	2.400	2515	No	Small
100,000	33.160	2.550	1.270	2515	No	Small
1,000,000	36.380	9.700	3.030	2525	No	Small
1,000,000	35.380	9.650	5.360	2525	No	Small
1,000,000	36.050	7.430	2.280	2525	No	Small

1,000,000	20.330	5.490	3.290	2525	No	Small
1,000,000	20.190	4.890	3.060	2525	No	Small
1,000,000	27.640	4.600	2.300	2525	No	Small
1,000,000	38.380	31.120	2.040	2505	No	Large
1,000,000	37.640	29.810	2.140	2505	No	Large
1,000,000	31.820	26.930	2.400	2505	No	Large
1,000,000	33.710	25.760	3.890	2505	No	Large
1,000,000	34.030	25.500	3.940	2505	No	Large
1,000,000	30.260	22.440	4.410	2505	No	Large
1,000,000	25.270	19.720	3.060	2505	No	Large
1,000,000	25.330	19.100	3.570	2505	No	Large
1,000,000	26.000	18.090	2.900	2505	No	Large
1,000,000	33.230	28.710	0.490	5023	No	Large
1,000,000	33.480	26.770	0.810	5023	No	Large
1,000,000	31.500	26.740	0.630	5023	No	Large
1,000,000	25.180	17.780	3.090	5023	No	Large
1,000,000	17.450	13.280	2.470	5023	No	Large
1,000,000	17.770	13.140	0.950	5023	No	Large
1,000,000	8.490	3.990	0.590	5033	No	Large
1,000,000	3.890	2.290	0.850	5033	No	Large
1,000,000	7.890	0.000	0.000	2525	No	Large
1,000,000	11.510	8.000	2.190	2535	Yes	Large
1,000,000	10.530	7.480	3.180	2535	Yes	Large
1,000,000	11.150	6.970	2.830	2535	Yes	Large
1,000,000	10.910	6.820	2.830	2535	Yes	Large
1,000,000	9.050	5.810	2.370	2535	Yes	Large
1,000,000	11.890	5.450	2.870	2535	Yes	Large
1,000,000	7.690	5.030	2.110	2535	Yes	Large
1,000,000	23.870	11.600	0.230	2509	No	Large
1,000,000	17.340	9.870	0.220	2509	No	Large
1,000,000	15.710	9.240	0.160	2509	No	Large
1,000,000	18.830	8.760	0.240	2509	No	Large
1,000,000	12.060	6.290	0.240	2509	No	Large
1,000,000	6.550	5.340	0.890	4042	No	Large
1,000,000	4.540	3.460	0.790	4042	No	Large
1,000,000	2.500	2.180	0.590	4042	No	Large
1,000,000	2.280	1.660	0.440	4042	No	Large
1,000,000	11.020	5.850	0.870	3506	No	Large
1,000,000	7.960	5.790	0.720	3506	No	Large
1,000,000	5.560	4.180	1.760	3506	No	Large
1,000,000	4.210	3.080	0.680	3506	No	Large
1,000,000	11.600	11.210	0.560	8005	No	Large
1,000,000	9.780	8.830	0.510	8005	No	Large
1,000,000	7.760	7.130	0.650	8005	No	Large
1,000,000	7.950	6.940	0.450	8005	No	Large
1,000,000	6.930	6.060	0.910	8005	No	Large

CityState	STATE	Authority	Jurisdiction	Status	ZIP	SIC	Activities	PrimaryLast filter_	\$
Sandusky, CO	OH	Federal	DUAL	Active	44870		2011 Certification	0	0
Sandusky, CO	OH	Federal	DUAL	Active	44870		2011 Certification	0	0
Sandusky, CO	OH	Federal	DUAL	Active	44870		2011 Certification	0	0
Sandusky, CO	OH	Federal	DUAL	Active	44870		2011 Certification	1	0
Beardstown	IL	Federal	FSIS	Active	62618		2011 Meat Process	0	1
Beardstown	IL	Federal	FSIS	Active	62618		2011 Meat Process	0	1
Beardstown	IL	Federal	FSIS	Active	62618		2011 Meat Process	1	1
Marengo, IL	IL	Federal	FSIS	Active	60152		2011 Meat Process	0	0
Marengo, IL	IL	Federal	FSIS	Active	60152		2011 Meat Process	1	0
Peoria, IL	IL	Federal	FSIS	Active	61602		2011 Certification	0	0
Peoria, IL	IL	Federal	FSIS	Active	61602		2011 Certification	0	0
Peoria, IL	IL	Federal	FSIS	Active	61602		2011 Certification	0	0
Peoria, IL	IL	Federal	FSIS	Active	61602		2011 Certification	1	0
Mount Mor	IL	Federal	FSIS	Active	61054		2011 Meat Process	0	0
Mount Mor	IL	Federal	FSIS	Active	61054		2011 Meat Process	0	0
Mount Mor	IL	Federal	FSIS	Active	61054		2011 Meat Process	0	0
Mount Mor	IL	Federal	FSIS	Active	61054		2011 Meat Process	0	0
Mount Mor	IL	Federal	FSIS	Active	61054		2011 Meat Process	1	0
Mount Mor	IL	Federal	FSIS	Active	61054		2011 Meat Process	0	0
Austin, MN	MN	Federal	FSIS	Active	55912		2011 Meat Process	0	1
Austin, MN	MN	Federal	FSIS	Active	55912		2011 Meat Process	0	1
Austin, MN	MN	Federal	FSIS	Active	55912		2011 Meat Process	0	1
Austin, MN	MN	Federal	FSIS	Active	55912		2011 Meat Process	0	1
Austin, MN	MN	Federal	FSIS	Active	55912		2011 Meat Process	1	1
Fremont, NE	NE	Federal	FSIS	Active	68025		2011 Meat Process	0	1
Fremont, NE	NE	Federal	FSIS	Active	68025		2011 Meat Process	0	1
Fremont, NE	NE	Federal	FSIS	Active	68025		2011 Meat Process	0	1
Fremont, NE	NE	Federal	FSIS	Active	68025		2011 Meat Process	0	1
Fremont, NE	NE	Federal	FSIS	Active	68025		2011 Meat Process	1	1
Sioux City, IA	IA	Federal	FSIS	Active	51106		2011 Meat Process	0	0
Sioux City, IA	IA	Federal	FSIS	Active	51106		2011 Meat Process	0	0
Sioux City, IA	IA	Federal	FSIS	Active	51106		2011 Meat Process	0	0
Sioux City, IA	IA	Federal	FSIS	Active	51106		2011 Meat Process	0	0
Sioux City, IA	IA	Federal	FSIS	Active	51106		2011 Meat Process	1	0
Kodak, TN	TN	Federal	FSIS	Active	37764		2011 Meat Process	0	0
Kodak, TN	TN	Federal	FSIS	Active	37764		2011 Meat Process	0	0
Kodak, TN	TN	Federal	FSIS	Active	37764		2011 Meat Process	0	0
Kodak, TN	TN	Federal	FSIS	Active	37764		2011 Meat Process	0	0
Kodak, TN	TN	Federal	FSIS	Active	37764		2011 Meat Process	0	0
Kodak, TN	TN	Federal	FSIS	Active	37764		2011 Meat Process	0	0
Kodak, TN	TN	Federal	FSIS	Active	37764		2011 Meat Process	1	0
Los Angeles	CA	Federal	AMS, DUAL, Active		90058		2011 Meat Process	0	1
Los Angeles	CA	Federal	AMS, DUAL, Active		90058		2011 Meat Process	0	1
Los Angeles	CA	Federal	AMS, DUAL, Active		90058		2011 Meat Process	0	1
Los Angeles	CA	Federal	AMS, DUAL, Active		90058		2011 Meat Process	0	1
Los Angeles	CA	Federal	AMS, DUAL, Active		90058		2011 Meat Process	0	1
Los Angeles	CA	Federal	AMS, DUAL, Active		90058		2011 Meat Process	1	1
Modesto, CA	CA	Federal	FSIS	Active	95351		5147 Meat Process	0	0

Modesto, CA	Federal	FSIS	Active	95351	5147 Meat Process	0	0
Modesto, CA	Federal	FSIS	Active	95351	5147 Meat Process	0	0
Modesto, CA	Federal	FSIS	Active	95351	5147 Meat Process	0	0
Modesto, CA	Federal	FSIS	Active	95351	5147 Meat Process	0	0
Modesto, CA	Federal	FSIS	Active	95351	5147 Meat Process	1	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	0	0
Twin Falls, ID	Federal	FSIS	Active	83301	2011 Meat Process	1	0
Hatfield, PA	Federal	DUAL	Active	19440	2011 Certification	0	1
Hatfield, PA	Federal	DUAL	Active	19440	2011 Certification	0	1
Hatfield, PA	Federal	DUAL	Active	19440	2011 Certification	0	1
Hatfield, PA	Federal	DUAL	Active	19440	2011 Certification	0	1
Hatfield, PA	Federal	DUAL	Active	19440	2011 Certification	1	1
Souderton, PA	Federal	FSIS	Active	18964	2011 Meat Process	0	0
Souderton, PA	Federal	FSIS	Active	18964	2011 Meat Process	0	0
Souderton, PA	Federal	FSIS	Active	18964	2011 Meat Process	0	0
Souderton, PA	Federal	FSIS	Active	18964	2011 Meat Process	0	0
Souderton, PA	Federal	FSIS	Active	18964	2011 Meat Process	0	0
Souderton, PA	Federal	FSIS	Active	18964	2011 Meat Process	0	0
Souderton, PA	Federal	FSIS	Active	18964	2011 Meat Process	1	0
Watertown, WI	Federal	FSIS	Inactive	53094	2013 Meat Process	1	0
Curtiss, WI	Federal	FSIS	Active	54422	751 Meat Process	0	0
Curtiss, WI	Federal	FSIS	Active	54422	751 Meat Process	0	0
Curtiss, WI	Federal	FSIS	Active	54422	751 Meat Process	0	0
Curtiss, WI	Federal	FSIS	Active	54422	751 Meat Process	0	0
Curtiss, WI	Federal	FSIS	Active	54422	751 Meat Process	0	0
Curtiss, WI	Federal	FSIS	Active	54422	751 Meat Process	1	0
Brookshire, TX	Federal	FSIS	Active	77423	2011 Meat Process	1	0
Hospers, IA	Federal	FSIS	Active	51238	2013 Meat Process	0	0
Hospers, IA	Federal	FSIS	Active	51238	2013 Meat Process	0	0
Hospers, IA	Federal	FSIS	Active	51238	2013 Meat Process	0	0
Hospers, IA	Federal	FSIS	Active	51238	2013 Meat Process	0	0
Hospers, IA	Federal	FSIS	Active	51238	2013 Meat Process	1	0
Estherville, IA	Federal	FSIS	Active	51334	2011 Certification	0	0
Estherville, IA	Federal	FSIS	Active	51334	2011 Certification	0	0
Estherville, IA	Federal	FSIS	Active	51334	2011 Certification	0	0
Estherville, IA	Federal	FSIS	Active	51334	2011 Certification	1	0
Sioux Cente IA	Federal	FSIS	Active	51250	2011 Meat Process	0	1
Sioux Cente IA	Federal	FSIS	Active	51250	2011 Meat Process	0	1
Sioux Cente IA	Federal	FSIS	Active	51250	2011 Meat Process	0	1

Sioux Cente IA	Federal	FSIS	Active	51250	2011 Meat Process	0	1
Sioux Cente IA	Federal	FSIS	Active	51250	2011 Meat Process	0	1
Sioux Cente IA	Federal	FSIS	Active	51250	2011 Meat Process	1	1
Columbus Jt IA	Federal	DUAL	Active	52738	2011 Meat Process	0	1
Columbus Jt IA	Federal	DUAL	Active	52738	2011 Meat Process	0	1
Columbus Jt IA	Federal	DUAL	Active	52738	2011 Meat Process	0	1
Columbus Jt IA	Federal	DUAL	Active	52738	2011 Meat Process	0	1
Columbus Jt IA	Federal	DUAL	Active	52738	2011 Meat Process	0	1
Columbus Jt IA	Federal	DUAL	Active	52738	2011 Meat Process	0	1
Columbus Jt IA	Federal	DUAL	Active	52738	2011 Meat Process	0	1
Columbus Jt IA	Federal	DUAL	Active	52738	2011 Meat Process	1	1
Logansport, IN	Federal	FSIS	Active	46947	2011 Meat Process	0	1
Logansport, IN	Federal	FSIS	Active	46947	2011 Meat Process	0	1
Logansport, IN	Federal	FSIS	Active	46947	2011 Meat Process	0	1
Logansport, IN	Federal	FSIS	Active	46947	2011 Meat Process	0	1
Logansport, IN	Federal	FSIS	Active	46947	2011 Meat Process	0	1
Logansport, IN	Federal	FSIS	Active	46947	2011 Meat Process	1	1
Delphi, IN IN	Federal	FSIS	Active	46923	2011 Meat Process	0	1
Delphi, IN IN	Federal	FSIS	Active	46923	2011 Meat Process	1	1
Storm Lake, IA	Federal	FSIS	Active	50588	4225 Meat Process	1	1
Sioux Falls, SD	Federal	AMS, SLP	Active	57103	2011 Meat Process	0	1
Sioux Falls, SD	Federal	AMS, SLP	Active	57103	2011 Meat Process	0	1
Sioux Falls, SD	Federal	AMS, SLP	Active	57103	2011 Meat Process	0	1
Sioux Falls, SD	Federal	AMS, SLP	Active	57103	2011 Meat Process	0	1
Sioux Falls, SD	Federal	AMS, SLP	Active	57103	2011 Meat Process	0	1
Sioux Falls, SD	Federal	AMS, SLP	Active	57103	2011 Meat Process	0	1
Sioux Falls, SD	Federal	AMS, SLP	Active	57103	2011 Meat Process	1	1
Ottumwa, IA	Federal	FSIS	Active	52501	2011 Identification	0	1
Ottumwa, IA	Federal	FSIS	Active	52501	2011 Identification	0	1
Ottumwa, IA	Federal	FSIS	Active	52501	2011 Identification	0	1
Ottumwa, IA	Federal	FSIS	Active	52501	2011 Identification	0	1
Ottumwa, IA	Federal	FSIS	Active	52501	2011 Identification	1	1
Guymon, OK	Federal	FSIS	Active	73942	2011 Certification	0	1
Guymon, OK	Federal	FSIS	Active	73942	2011 Certification	0	1
Guymon, OK	Federal	FSIS	Active	73942	213 Certification	0	1
Guymon, OK	Federal	FSIS	Active	73942	213 Certification	1	1
St. Joseph, MO	Federal	DUAL	Active	64504	2011 Certification	0	1
St. Joseph, MO	Federal	DUAL	Active	64504	2011 Certification	0	1
St. Joseph, MO	Federal	DUAL	Active	64504	2011 Certification	0	1
St. Joseph, MO	Federal	DUAL	Active	64504	2011 Certification	1	1
Tar Heel, NC	Federal	FSIS	Active	28392	2011 Meat Process	0	1
Tar Heel, NC	Federal	FSIS	Active	28392	2011 Meat Process	0	1
Tar Heel, NC	Federal	FSIS	Active	28392	2011 Meat Process	0	1
Tar Heel, NC	Federal	FSIS	Active	28392	2011 Meat Process	0	1
Tar Heel, NC	Federal	FSIS	Active	28392	2011 Meat Process	1	1

CircuitID	CircuitLocation	CircuitFull Name	AreaID	CircuitNumber	DistrictNumber	AreaLocation	AreaFull Name	Business UnitID	Business UnitFull Name
60	Circuit 60	OFO/District 60	60	6060	60	District 60	OFO/District 60	OFO	OFO-Office
3	Circuit 03	OFO/District 5	5	503	5	District 05	OFO/District 05	OFO	OFO-Office
24	Circuit 24	OFO/District 40	40	4024	40	District 40	OFO/District 40	OFO	OFO-Office
11	Circuit 11	OFO/District 90	90	9011	90	District 90	OFO/District 90	OFO	OFO-Office
VA	Circuit VA	OFO/District 80	80	80VA	80	District 80	OFO/District 80	OFO	OFO-Office
7	Circuit 07	OFO/District 15	15	1507	15	District 15	OFO/District 15	OFO	OFO-Office
33	Circuit 33	OFO/District 50	50	5033	50	District 50	OFO/District 50	OFO	OFO-Office
32	Circuit 32	OFO/District 50	50	5032	50	District 50	OFO/District 50	OFO	OFO-Office
35	Circuit 35	OFO/District 25	25	2535	25	District 25	OFO/District 25	OFO	OFO-Office
60	Circuit 60	OFO/District 60	60	6060	60	District 60	OFO/District 60	OFO	OFO-Office
27	Circuit 27	OFO/District 40	40	4027	40	District 40	OFO/District 40	OFO	OFO-Office
31	Circuit 31	OFO/District 25	25	2531	25	District 25	OFO/District 25	OFO	OFO-Office
25	Circuit 25	OFO/District 25	25	2525	25	District 25	OFO/District 25	OFO	OFO-Office
42	Circuit 42	OFO/District 40	40	4042	40	District 40	OFO/District 40	OFO	OFO-Office
25	Circuit 25	OFO/District 25	25	2525	25	District 25	OFO/District 25	OFO	OFO-Office
21	Circuit 21	OFO/District 90	90	9021	90	District 90	OFO/District 90	OFO	OFO-Office
5	Circuit 05	OFO/District 50	50	5005	50	District 50	OFO/District 50	OFO	OFO-Office
23	Circuit 23	OFO/District 25	25	2523	25	District 25	OFO/District 25	OFO	OFO-Office
21	Circuit 21	OFO/District 90	90	9021	90	District 90	OFO/District 90	OFO	OFO-Office
23	Circuit 23	OFO/District 90	90	9023	90	District 90	OFO/District 90	OFO	OFO-Office

EstablishmentID	EstablishmentName	EstablishmentNumber	PrimaryEstablishmentNumber	Is430	HACCPProcessing Size	AddressLine1	AddressLine2	CityState	STATE
6408	Clemens Farm	M791+P79	M791	Yes	Large	2700 Clem	P.O. Box 9	Hatfield, PA	PA
5118	Clougherty	M360+P36	M360	Yes	Large	3049 E. Ve		Los Angeles	CA
4272	Columbia Farm	M7237	M7237	No	Small	2807 E. 11		Dallas, TX	TX
2019	F.B. Purne	M7464+P7	M7464	Yes	Small	6931 Shell		Simpsonville	KY
2332	Gunnoe Sr	M6541	M6541	No	Small	3989 Cifax		Goode, VA	VA
5932	Independence	M226+P48	M226	Yes	Small	2072 Orch		Twin Falls, ID	ID
2679	Indiana Park	M17564	M17564	No	Large	Highway 4:		Delphi, IN	IN
1891	J. H. Routh	M818+V81	M818	Yes	Small	4413 W. B		Sandusky, OH	OH
2936	John Morris	M17D+P76	M17D	Yes	Large	1400 North		Sioux Falls	SD
6710	Leidys, Inc	M9520+P9	M9520	Yes	Small	266 West C		Souderton, PA	PA
4406	Mineola Park	M19541	M19541	No	Small	906 East E		Mineola, TX	TX
2979	Quality Point	M1620	M1620	No	Large	711 Horme		Austin, MN	MN
3527	Sig Internat	M20748	M20748	No	Small	826 Main S	P.O.Box 30	Boyden, IA	IA
3907	Seaboard Inc	M13597+V	M13597	No	Large	2700 NE 2		Guymon, OK	OK
3363	Sioux-Prer	M5537	M5537	No	Small	4241 US 7	P.O. Box 2	Sioux Center	IA
4669	Swaggerty	M8314+V8	M8314	No	Small	2827 Swag	Suite 1	Kodak, TN	TN
2713	Spectrum Inc	M19185	M19185	No	Small	6194 W. P		Mount Morris	IL
3259	Verschoor	M363	M363	No	Small	1401 Bluff		Sioux City, IA	IA
4680	Wamplers	M9065+P9	M9065	No	Small	781 Highw		Lenoir City	TN
4642	Williams Sr	M7455+P7	M7455	Yes	Small	5132 Old T		Union City, TN	TN

StateName	PostalCode	ImportEstablishmentNumber	EstablishmentDBAs	MainPhone	GrantDate	InspectionActivities	EstablishmentStatus	EstablishmentDescription	InspectionAuthority
Pennsylvania	19440		Butcher W	(215) 368-	NULL	Certificatio	A	Active	Federal
California	90058		Farmer Jol	(323) 583-	NULL	Meat Proc	A	Active	Federal
Texas	75203		NULL	(214) 946-	NULL	Meat Proc	A	Active	Federal
Kentucky	40067		NULL	(502) 722-	NULL	Meat Proc	A	Active	Federal
Virginia	24556		NULL	(540) 586-	NULL	Meat Proc	A	Active	TA
Idaho	83301		Falls Branc	(208) 733-	NULL	Meat Proc	A	Active	Federal
Indiana	46923		Home Kitc	(765) 564-	NULL	Meat Proc	A	Active	Federal
Ohio	44870		NULL	(419) 626-	NULL	Certificatio	A	Active	Federal
South Dakota	57103		Agar Food	(605) 338-	NULL	Meat Proc	A	Active	Federal
Pennsylvania	18964		Alderfer M	(215) 723-	NULL	Meat Proc	A	Active	Federal
Texas	75773		NULL	(903) 569-	NULL	Meat Proc	A	Active	Federal
Minnesota	55912		NULL	(507) 434-	NULL	Meat Proc	A	Active	Federal
Iowa	51234		NULL	(712) 725-	NULL	Meat Proc	A	Active	Federal
Oklahoma	73942		NULL	(580) 338-	NULL	Certificatio	A	Active	Federal
Iowa	51250		Maxi Marg	(712) 722-	NULL	Meat Proc	A	Active	Federal
Tennessee	37764		Smoky Far	(615) 933-	NULL	Meat Proc	A	Active	Federal
Illinois	61054		NULL	(815) 946-	NULL	Meat Proc	A	Active	Federal
Iowa	51106		NULL	(712) 252-	NULL	Meat Proc	A	Active	Federal
Tennessee	37771		NULL	(865) 986-	NULL	Meat Proc	A	Active	Federal
Tennessee	38261		Grogan's F	(731) 885-	NULL	Meat Proc	A	Active	Federal

Jurisdiction	MeatGrantStatus	LastMeatGrantEditDate	PoultryGrantStatus	LastPoultryGrantEditDate	EggGrantStatus	LastEggGrantEditDate	ImportGrantStatus	LastImportGrantEditDate	VoluntaryGrantStatus
DUAL	Granted	NULL	Granted	NULL	NULL	NULL	NULL	NULL	Granted
AMS, DUAL	Granted	NULL	Granted	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
DUAL	Granted	NULL	Granted	NULL	NULL	NULL	NULL	NULL	NULL
TA	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	Granted	NULL	NULL	NULL	NULL	NULL	Granted
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
DUAL	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	Granted
AMS, SLP	Granted	NULL	Granted	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	Granted	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	Granted
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	Withdrawn
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	NULL	NULL	NULL	NULL	NULL	NULL	NULL
FSIS	Granted	NULL	Granted	NULL	NULL	NULL	NULL	NULL	Granted
DUAL	Granted	NULL	Granted	NULL	NULL	NULL	NULL	NULL	NULL

LastVolun	Combined	Business	Business							
taryGrant	GrantStat	UnitIDNe	UnitFullN							
EditDate	us	w	ameNew Zip4	AreaPK	CircuitPK	ESTABLI	SHMENT	NAME2	STREET	
NULL	Active	OFO	OFO-Offici NULL		71	121	CLEMENS	HATFIELD	2700 FUNI	
NULL	Active	OFO	OFO-Offici NULL		62	8	CLOUGHE	FARMER .	3049 E VE	
NULL	Active	OFO	OFO-Offici NULL		68	77	COLUMBI		2807 E 11	
NULL	Active	OFO	OFO-Offici NULL		76	149	F B PURN	PURNELL	6931 SHEI	
NULL	Active	OFO	OFO-Offici 2500		74	399	GUNNOE		3989 CIFA	
NULL	Active	OFO	OFO-Offici NULL		63	25	INDEPENI	INDEPENI	2072 ORC	
NULL	Active	OFO	OFO-Offici NULL		70	108	Indiana Pa		HIGHWAY	
NULL	Active	OFO	OFO-Offici NULL		70	107	J H ROUT		4413 W BC	
NULL	Active	OFO	OFO-Offici NULL		65	41	JOHN MO		1400 N WE	
NULL	Active	OFO	OFO-Offici NULL		71	121	LEIDYS IN		266 W CH	
NULL	Active	OFO	OFO-Offici NULL		68	80	Mineola Pz	Mineola Pz	906 E BRC	
NULL	Active	OFO	OFO-Offici NULL		65	40	QUALITY I	QUALITY I	711 HORN	
NULL	Active	OFO	OFO-Offici NULL		65	51	S I G Inter		826 Main S	
NULL	Active	OFO	OFO-Offici NULL		68	72	SEABOAR		2700 NE 2	
NULL	Active	OFO	OFO-Offici NULL		65	51	SIOUX-PR		4241 US 7	
NULL	Active	OFO	OFO-Offici NULL		76	176	SWAGGEI		2827 SWA	
NULL	Active	OFO	OFO-Offici NULL		70	98	Spectrum I		6194 W Pi	
NULL	Active	OFO	OFO-Offici NULL		65	50	Verschoor		1401 BLUF	
NULL	Active	OFO	OFO-Offici NULL		76	176	Wamplers		781 HIGH	
NULL	Active	OFO	OFO-Offici NULL		76	177	Williams S	OLE SOU	5132 Old T	

CITY	ZIP	SIC	TCR	DART	DAFWII	Year	Establishment _ID	Primary_Estab lishment_Num ber
HATFIELD	19440	2011	20.76	10.1	2.62	2002	6408	M791
LOS ANGELES	90058	2011	3.39	1.96	1.43	2002	5118	M360
DALLAS	75203	5147	10.64	9.67	2.9	2002	4272	M7237
SIMPSON	40067	2013	15.78	6.44	2.57	2002	2019	M7464
GOODE	24556	2013	6.07	1.01	1.01	2002	2332	M6541
TWIN FALLS	83301	2011	21.81	21.81	7.69	2002	5932	M226
DELPHI	46923	2011	8.49	3.99	0.59	2002	2679	M17564
SANDUSKY	44870	2011	18.03	11.3	5.5	2002	1891	M818
SIOUX FALLS	57103	2011	11.51	8	2.19	2002	2936	M17D
SOUDERT	18964	2011	19.29	11.92	2.1	2002	6710	M9520
MINEOLA	75773	5147	2.94	2.94	2.94	2002	4406	M19541
AUSTIN	55912	2011	14.84	9.59	0.6	2002	2979	M1620
Boyden	51234	2011	32.5	3.42	1.71	2002	3527	M20748
GUYMON	73942	2011	6.55	5.34	0.89	2002	3907	M13597
SIOUX CENTER	51250	2011	35.38	9.65	5.36	2002	3363	M5537
KODAK	37764	2011	13.51	6.75	6.75	2002	4669	M8314
Mount Morris	61054	2011	9.28	0	0	2002	2713	M19185
SIOUX CITY	51106	2011	14.63	14.63	1.46	2002	3259	M363
LENOIR CITY	37771	2011	47.62	44.64	6.94	2002	4680	M9065
Union City	38261	2013	6.81	4.54	2.27	2002	4642	M7455

Size_or_ HACCP_ Processin g_Size	HIMP_ Traditiona l	Establish ment_Na me
Large	HIMP	Clemens Food Group, LLC
Large	HIMP	Clougherty Packing LLC
Small	Traditional	Columbia Packing Co., Inc.
Small	Traditional	F.B. Purnell Sausage Co., Inc.
Small	Traditional	Gunnore Sausage Company, Inc.
Small	Traditional	Independent Meat Company
Large	Traditional	Indiana Packers Corporation
Small	Traditional	J. H. Routh Packing Company
Large	Traditional	John Morrell & Co.
Small	Traditional	Leidys, Inc.
Small	Traditional	Mineola Packing Co. Inc.
Large	HIMP	Quality Pork Processors, Inc.
Small	Traditional	Sig International, Iowa, Inc.
Large	Traditional	Seaboard Foods
Small	Traditional	Sioux-Preme Packing Co.
Small	Traditional	Swaggerty Sausage Company, Inc.
Small	Traditional	Spectrum Preferred Meats, Inc
Small	Traditional	Verschoor Meats, Inc.
Small	Traditional	Wamplers Farm Sausage
Small	Traditional	Williams Sausage Co Inc

CircuitID	CircuitLocation	CircuitFullName	CircuitNumber	DistrictNumber
25	Circuit 25 Fort Worth, TX	OFO/District 40/ Circuit 25	4025	40

AreaLocation	AreaFullName	Business UnitID	BusinessUnitFullName
District 40 Dallas	OFO/District 40	OFO	OFO-Office of Field Operations

			PrimaryEstablishmentNumber
EstablishmentID	EstablishmentName	EstablishmentNumber	
8322	Beltex Corporation	M7041+V7041	M7041

HACCPProcessing			
Is430	singSize	AddressLine1	AddressLine2
No	Small	3801 North Grove Street	

CityState		STATE	StateName	PostalCode	ImportEstablishmentNumber
Fort Worth, TX		TX	Texas	76106	

DBAs	MainPhoneNumber	GrantDate	InspectionActivities
Frontier Meats	(817) 624-1136	NULL	Meat Processing; Meat Slaughter; Vo

EstablishmentStatus	EstablishmentStatusDescription	Inspection Authority	Jurisdiction	MeatGrantStatus	LastMeatGrantEditDate
A	Active	Federal	FSIS	Granted	NULL

PoultryGrantStatus	LastPoultryGrantEditDate	EggGrantStatus	LastEggGrantEditDate	ImportGrantStatus
NULL	NULL	NULL	NULL	NULL

LastImp ortGrant EditDate	VoluntaryGrantStatus	LastVolu ntaryGra ntEditDa te	CombinedGra ntStatus	Business UnitIDNe w	BusinessUnitFullNameNew
NULL	Granted	NULL	Active	OFO	OFO-Office of Field Operations

Zip4	AreaPK	CircuitPK	ESTABLISHMENT
NULL		68	78 BELTEX CORPORATION

NAME2

STREET

CITY

3801 N GROVE ST

FORT WORTH

ZIP	SIC	TCR	DART	DAFWII	Year
76106	2011		10.03	8.91	1.11 2002

Primary_Establishmen		Size_or_HACC	HIMP____Traditi	
Establishment_ID	t_Number	P_Processing_ Size	onal	Establishment_Name
8322	M7041	Small	Traditional	Beltex Corporation



United States Department of Agriculture

Food Safety and
Inspection Service

1400 Independence
Avenue, SW.
Washington, D.C.
20250

Deborah Berkowitz
Senior Fellow
National Employment Law Project
2040 S Street, NW, Lower Level
Washington, D.C. 20009

SEP 12 2018

RE: FOIA-2018-00227
Hog HIMP

Dear Ms. Berkowitz:

This is the final response to your Freedom of Information Act (FOIA) request, dated March 6, 2018, to the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS). You requested access to a copy of records concerning: the comparison of injury rates between HIMP and traditional swine slaughter plants, from 2002 to 2010, referenced in the Modernization of Swine Slaughter Inspection proposed rule (83 F.R. 4796); contact information for the traditional plants referenced in the rule; data on the number of sorters on the lines and line speeds; and data on employees' injury and illness in swine slaughter establishments using data after 2011. We received your request in our office on March 6, 2018.

The FSIS FOIA staff works with subject matter experts across the Agency to locate responsive documents. For this request, we conducted a records search in the Office of Data Integration and Food Protection, the Office of Public Health Science, and the Office of Policy and Program Development. FSIS' search began on March 7, 2018. Our search includes responsive records in FSIS' control on that date.

We have processed 46 pages of pdf records and four sets of Excel spreadsheets containing multiple entries that are responsive to your request. After a thorough review, we have determined that portions of the pages fall within the exemptions to the FOIA's mandatory disclosure requirements, as explained below. In particular, we have determined that portions of these documents are exempt from disclosure under (b)(4), (b)(5) and (b)(6) of the FOIA, 5 U.S.C. § 552, as amended. Accordingly, this request is granted in part, denied in part.

Some responsive records constitute confidential commercial or financial information, which is exempt from disclosure under FOIA Exemption 4, 5 U.S.C. § 552(b)(4). Disclosure of this information may cause substantial competitive harm to the establishment from which this information was obtained. Further,

disclosure of such information may impair the government's ability to obtain necessary information in the future.

Some responsive records contain drafts, staff analyses, opinions, or recommendations. Those portions are deliberative and pre-decisional and are an integral part of the agency's decision making process. They are exempt from the FOIA's disclosure requirements by FOIA Exemption 5, 5 U.S.C. § 552(b)(5).

Portions of the responsive records are exempt from disclosure under FOIA Exemption 6, 5 U.S.C. § 552(b)(6). Exemption 6 protects information that would constitute an unwarranted invasion of an individual's personal privacy. The types of information withheld under Exemption 6 include the names of inspection personnel.

Please be advised that your FOIA request, including your identity and the information made available, is releasable to the public under any subsequent FOIA requests. However, FSIS does not release your personal privacy information, such as home addresses, telephone numbers, or Social Security Numbers, all of which are protected from disclosure under FOIA Exemption 6.

You may appeal this determination within 90 days from the date of this letter. Your appeal should include copies of your original request and this response, as well as a discussion of the reasons supporting your appeal. The envelope should be plainly marked to indicate that it contains a FOIA appeal. If you decide to appeal this determination, please send your appeal to:

Paul Kiecker
Acting Administrator
Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue, S.W.
Room 2168, South Building
Washington, D.C. 20250-3700

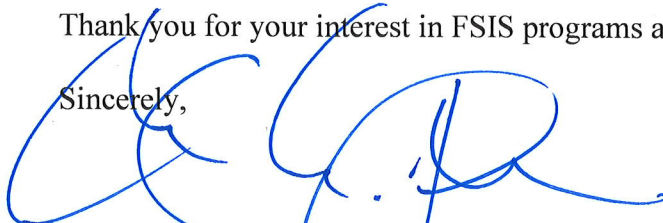
Please be advised that in accordance with your conversation with Government Information Specialist Mark Brook, we will be closing your FOIA Appeal regarding expedited processing of this request as the request has now been fully satisfied. We apologize for the delay in responding.

Your FOIA request, including your identity and any information made available, is releasable to the public under any subsequent FOIA requests. However, FSIS does not release your personal privacy information, such as home addresses, telephone numbers, or Social Security Numbers, all of which are protected from disclosure under FOIA Exemption 6.

If you have any questions about the way this request was handled, please contact Anne Sylvester at Anne.Sylvester@fsis.usda.gov or 202-205-0144. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; or facsimile at 202-741-5769.

Thank you for your interest in FSIS programs and policies.

Sincerely,



Arianne M. Perkins
Director, Freedom of Information Act Staff
Office of Public Affairs and Consumer Education
Food Safety and Inspection Service

Enclosure

Be Food Safe: **CLEAN:** Wash Hands and Surfaces Often **SEPARATE:** Separate Raw
Meats from Other Foods
COOK: Cook To The Right Temperature **CHILL:** Refrigerate Food Promptly

An Equal Opportunity Provider and Employer

June 21, 2012

Selina Hallan
Quality Services Manager
Quality Pork Processors, Inc., M1620
711 Hormel Century Parkway
Austin, MN 55912

Dear Ms. Hallan:

This letter is in response to your *Salmonella* Initiative Program (SIP) protocol submission dated November 2, 2011 (Log Number 11-SIP-003-N-A) at Quality Pork Processors, Inc. (Est. M1620); Austin, MN and your waiver requests for the use of alternative:

- procedures for line speed and HACCP-based Inspection Models Project (HIMP) [9 CFR 310.1(b)(3)]; and
- procedures for generic *E. coli* and *Salmonella* sampling and testing [9 CFR 310.25(a) and (b)].

The Food Safety and Inspection Service (FSIS) has completed the review of your requests and is hereby granting your company an approval of the waiver of the regulations pending the Agency amendment of 9 CFR 310.1(b)(3) and 310.25(a) and (b), pursuant under 9 CFR 381.3(b).

FSIS has no objection to Est. M1620 using alternative procedures for line speed in place of 9 CFR 310.1(b)(3), alternative generic *E. coli* sampling and testing in place of 9 CFR 310.25(a), and alternative daily *Salmonella* sampling and testing procedures as described in its SIP Protocol in place of 9 CFR 310.25(b) provided the establishment:

Assesses, modifies and validates as appropriate, the Hazard Analysis and Critical Control Point (HACCP) plan according to 9 CFR 304.3 and 417.4 for:

- the SIP protocol;
- continuing CCPs for Infectious conditions (e.g. pyemia, septicemia, toxemia) (9 CFR 311.16 and 311.17), for Contamination (fecal, ingesta and milk contamination) [(9 CFR 310.18(a)], and for Ante-mortem Suspect (9 CFR 309.2) with zero as the critical limit (CL); and
- continuing the Slaughter Process Control Plan to meet standards of the FSIS "Market Hogs HIMP" Draft dated 06/21/05; and the alternative procedures for line speed [9 CFR 310.1(b)(3)].

Makes available and discuss with FSIS Inspection Program Personnel (IPP) at the weekly meeting or on a conference call with IPP and appropriate District Office the following:

- this SIP Letter which provides that FSIS is granting a waiver of 9 CFR 310.1(b)(3) and 310.25(a) and (b) and has no objection to Est. M1620 using the alternative procedures specified in this letter and the SIP Protocol;
- the alternative procedures the establishment will use as described above;
- the SIP Protocol which identifies the regulations waived, the alternative procedures used, the microbiological sampling and testing implemented and the establishment's agreement to share microbiological sampling and testing results and other data with FSIS; and
- the IPP Verification Overview which:
 - identifies where the establishment has elected to include its alternative procedures and SIP Protocol in its food safety system, and
 - provides specific verification procedures for verifying that the establishment is operating in a manner that is consistent with the alternative procedures and SIP Protocol.
 - **NOTE:** IPP are to verify one or more parts of the alternative procedures or other aspects of the SIP Protocol once per week using an appropriate Public Health Inspection System (PHIS) task and according to instructions in FSIS Directive 5020.1 Verification of SIP.

IPP Verification Overview:

<u>Regulation(s) Waived</u>	<u>Alternative Procedures Verified by IPP</u>	<u>Location in Food Safety System</u>	<u>Regulation(s) to Verify and Cite on NR</u>
310.1(b)(3) (line speed)	HIMP Slaughter Process Control Plan Establishment conducts monitoring according to plan and meets requirements of FSIS – Market Hogs HIMP Draft (06/21/05).	Prerequisite Program	Verify according to FSIS – Market Hogs HIMP Draft (06/21/05) 381.1 and 381.3(b)
310.25(b) (<i>Salmonella</i> Performance Standard)	SIP Protocol : Establishment Microbial Testing A. Frequency	Prerequisite Program	Verify establishment is following SIP Protocol and is therefore supporting decisions

310.25(a) (<i>E. coli</i> testing frequency)	1. Daily: <i>Salmonella</i> postchill samples 1 per line per shift 2. Weekly: one matched pair samples per plant for <i>Salmonella</i>, Mesophilic Aerobic Bacteria <u>B. Following Sampling and testing procedures</u> <u>C. Recording and responding to Daily <i>Salmonella</i> test results;</u> <u>D. If exceed standard:</u> 1. Increase <i>Salmonella</i> frequency to 2 samples per shift. 2. Investigate cause, document corrective actions. 3. Return to previous frequency when 2 consecutive sample sets meet standard (no more than 6 positives out of 55 samples). (Generic <i>E. coli</i> frequency is zero).		made in the hazard analysis. 417.5(a) & 381.3(b)
--	---	--	--

Writes sampling procedures that identify employees designated to collect samples and address locations of sampling, how random sampling will be achieved to cover all lines and all shifts, and how the samples will be handled to ensure sample integrity for *Salmonella*, *E. coli*, and applicable indicator organisms (Mesophilic Aerobic Bacteria).

Conducts microbiological sampling according to the written sampling procedures and at the frequency stated below:

- Every day of production collect one *Salmonella* sample per evisceration line per shift (for a total of 2 samples per day) at the postchill location after all postchill applications the establishment has implemented to reduce microbial contamination of carcasses.
- Each week collect one pre-evisceration sample to compare results to a matched¹ postchill sample for each of the following microbes: *Salmonella*, *E. coli*, and applicable indicator organisms (Mesophilic Aerobic Bacteria).

¹ Pre-evisceration and postchill matched samples—postchill taken after time for carcass to travel from pre-evisceration location, through evisceration and cooler.

NOTE: the alternative daily *Salmonella* testing and weekly pre-evisceration to postchill matched samples are used in place of daily postchill generic *E. coli* testing (9 CFR 310.25(a)).

Records all microbiological test results.

Maintains six² or less positive *Salmonella* test results in a 55 sample set by using discrete sample set to count the number of positives to determine status.

Responds to greater than 6 *Salmonella* positive test results by:

- increasing the frequency of *Salmonella* testing to 4 samples per day;
- reviewing the establishment's total food safety system with consideration given to whether the waiver of requirements has caused the lack of control and take corrective and preventive actions to re-gain control and document those actions; and
- demonstrating restoration of process control by conducting at the increased testing frequency two consecutive sample sets that have 6 or less positive *Salmonella* test results in each 55 sample set. After demonstrating control, the frequency of testing can then return to 1 *Salmonella* sample per line per shift.

NOTE: At this time, it is not necessary to send *Salmonella* isolates to the FSIS Laboratory at Athens, Georgia.

Maintains records in the same manner and for the same duration as HACCP records (9 CFR 417.5).

Allows access to the records necessary to document SIP process control including microbiological test results to FSIS IPP. FSIS requires access to the records at least weekly.

Submits microbiological test results to FSIS headquarters monthly according to the FSIS template and instructions on how to submit (including frequency), which can be obtained by e-mailing the FSIS "SIP.Mailbox@FSIS.USDA.gov."

NOTE: Although FSIS expects that an individual establishment submitting data through the template and following instructions will not be identified, FSIS cannot guarantee that data may not be obtained through the Freedom of Information Act (FOIA).

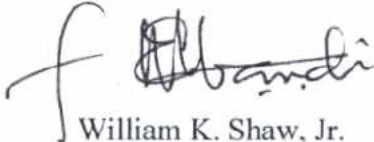
Provides FSIS 30 days prior written notice if the establishment decides to stop participation in the SIP and stop operating under the waivers.

Please be aware that if Quality Pork Processors, Inc. (Est. M1620) system conflicts with the provisions of the Federal Meat Inspection Act (21 U.S.C. 601, et seq.), or has repeated Noncompliance Records (NRs) documenting failure to maintain the alternative procedures or to follow the SIP Protocol, then the waivers will be revoked.

² Note: The expected level of an establishment's performance is contained in this letter or future SIP letters

If you have questions, please contact Isabel Arrington, Risk, Innovations, and Management Division (RIMD), Office of Policy and Program Development (OPPD) at (402) 344-5016 or e-mail Isabel.Arrington@fsis.usda.gov or Selena Kremer, RIMD, OPPD at (301) 504-0855 or email selena.kremer-caldwell@fsis.usda.gov.

Sincerely,



William K. Shaw, Jr.
Director
Risk, Innovations, and Management Division
Office of Policy and Program Development

Attachments:

1. SIP Protocol

cc:

Rachel Edelstein, Acting AA, OPPD
Daniel Engeljohn, AA, OFO
Haroon Mian, EARO, OFO
Phyllis Adams, DM, OFO
Eric Garnighian, DDM, OFO
Andrew Lorenz, DDM, OFO
(b) (6), FLS, OFO
(b) (6), IIC, OFO
Patrick Burke, RIMD, OPPD
Isabel Arrington, RIMD, OPPD
Liza Murray, RIMD, OPPD
Delila Parham, RIMD, OPPD
Nora Pihkala, RIMD, OPPD
Scott Seys, RIMD, OPPD
Selena Kremer, RIMD, OPPD

FSIS:OPPD:RIMD File: Kremer M1620 SIP Letter Number 11-SIP-003-N-A.

June 21, 2012

Kelly Gartner
Compliance Superintendent
Clemens Food Group dba Hatfield Quality Meats, M791
2700 Clemens Road
Hatfield, PA 19440

Dear Ms. Gartner:

This letter is in response to your *Salmonella* Initiative Program (SIP) protocol submission dated November 8, 2011 (Log Number 11-SIP-130-N-A) at Clemens Food Group dba Hatfield Quality Meats (Est. M791); Hatfield, PA and your waiver requests for the use of alternative:

- procedures for line speed and HACCP-based Inspection Models Project (HIMP) [9 CFR 310.1(b)(3)]; and
- procedures for generic *E. coli* and *Salmonella* sampling and testing [9 CFR 310.25(a) and (b)].

The Food Safety and Inspection Service (FSIS) has completed the review of your requests and is hereby granting your company an approval of the waiver of the regulations pending the Agency amendment of 9 CFR 310.1(b)(3) and 310.25(a) and (b), pursuant under 9 CFR 381.3(b).

FSIS has no objection to Est. M791 using alternative procedures for line speed in place of 9 CFR 310.1(b)(3), alternative generic *E. coli* sampling and testing in place of 9 CFR 310.25(a), and alternative daily *Salmonella* sampling and testing procedures as described in its SIP Protocol in place of 9 CFR 310.25(b) provided the establishment:

Assesses, modifies and validates as appropriate, the Hazard Analysis and Critical Control Point (HACCP) plan according to 9 CFR 304.3 and 417.4 for:

- the SIP protocol;
- continuing CCPs for Infectious conditions (e.g. pyemia, septicemia, toxemia) (9 CFR 311.16 and 311.17), for Contamination (fecal, ingesta and milk contamination) [(9 CFR 310.18(a)], and for Ante-mortem Suspect (9 CFR 309.2) with zero as the critical limit (CL); and
- continuing the Slaughter Process Control Plan to meet standards of the FSIS "Market Hogs HIMP" Draft dated 06/21/05; and the alternative procedures for line speed [9 CFR 310.1(b)(3)].

Makes available and discuss with FSIS Inspection Program Personnel (IPP) at the weekly meeting or on a conference call with IPP and appropriate District Office the following:

- this SIP Letter which provides that FSIS is granting a waiver of 9 CFR 310.1(b)(3) and 310.25(a) and (b) and has no objection to Est. M791 using the alternative procedures specified in this letter and the SIP Protocol;
- the alternative procedures the establishment will use as described above;
- the SIP Protocol which identifies the regulations waived, the alternative procedures used, the microbiological sampling and testing implemented and the establishment's agreement to share microbiological sampling and testing results and other data with FSIS; and
- the IPP Verification Overview which:
 - identifies where the establishment has elected to include its alternative procedures and SIP Protocol in its food safety system, and
 - provides specific verification procedures for verifying that the establishment is operating in a manner that is consistent with the alternative procedures and SIP Protocol.
 - **NOTE:** IPP are to verify one or more parts of the alternative procedures or other aspects of the SIP Protocol once per week using an appropriate Public Health Inspection System (PHIS) task and according to instructions in FSIS Directive 5020.1 Verification of SIP.

IPP Verification Overview:

<u>Regulation(s) Waived</u>	<u>Alternative Procedures Verified by IPP</u>	<u>Location in Food Safety System</u>	<u>Regulation(s) to Verify and Cite on NR</u>
310.1(b)(3) (line speed)	HIMP Slaughter Process Control Plan Establishment conducts monitoring according to plan and meets requirements of FSIS – Market Hogs HIMP Draft (06/21/05).	Prerequisite Program	Verify according to FSIS – Market Hogs HIMP Draft (06/21/05) 381.1 and 381.3(b)
310.25(b) (<i>Salmonella</i> Performance Standard)	SIP Protocol : Establishment Microbial Testing A. Frequency	Prerequisite Program	Verify establishment is following SIP Protocol and is therefore supporting decisions

310.25(a) (<i>E. coli</i> testing frequency)	1. <u>Daily:</u> <i>Salmonella</i> postchill samples 1 per line per shift 2. <u>Weekly:</u> one matched pair samples per plant for <i>Salmonella</i>, generic <i>E. coli</i> <u>B. Following Sampling and testing procedures</u> <u>C. Recording and responding to Daily <i>Salmonella</i> test results;</u> <u>D. If exceed standard:</u> 1. Increase <i>Salmonella</i> frequency to 2 samples per shift. 2. Investigate cause, document corrective actions. 3. Return to previous frequency when 2 consecutive sample sets meet standard (no more than 6 positives out of 55 samples). (Generic <i>E. coli</i> frequency is zero).		made in the hazard analysis. 417.5(a) & 381.3(b)
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Writes sampling procedures that identify employees designated to collect samples and address locations of sampling, how random sampling will be achieved to cover all lines and all shifts, and how the samples will be handled to ensure sample integrity for *Salmonella* and *E. coli*.

Conducts microbiological sampling according to the written sampling procedures and at the frequency stated below:

- Every day of production collect one *Salmonella* sample per evisceration line per shift (for a total of 1 sample per day) at the postchill location after all postchill applications the establishment has implemented to reduce microbial contamination of carcasses.
- Each week collect one pre-evisceration sample to compare results to a matched¹ postchill sample for each of the following microbes: *Salmonella* and *E. coli*.

¹ Pre-evisceration and postchill matched samples—postchill taken after time for carcass to travel from pre-evisceration location, through evisceration and cooler.

NOTE: the alternative daily *Salmonella* testing and weekly pre-evisceration to postchill matched samples are used in place of daily postchill generic *E. coli* testing (9 CFR 310.25(a)).

Records all microbiological test results.

Maintains six² or less positive *Salmonella* test results in a 55 sample set by using discrete sample set to count the number of positives to determine status.

Responds to greater than 6 *Salmonella* positive test results by:

- increasing the frequency of *Salmonella* testing to 2 samples per day;
- reviewing the establishment's total food safety system with consideration given to whether the waiver of requirements has caused the lack of control and take corrective and preventive actions to re-gain control and document those actions; and
- demonstrating restoration of process control by conducting at the increased testing frequency two consecutive sample sets that have 6 or less positive *Salmonella* test results in each 55 sample set. After demonstrating control, the frequency of testing can then return to 1 *Salmonella* sample per line per shift.

NOTE: At this time, it is not necessary to send *Salmonella* isolates to the FSIS Laboratory at Athens, Georgia.

Maintains records in the same manner and for the same duration as HACCP records (9 CFR 417.5).

Allows access to the records necessary to document SIP process control including microbiological test results to FSIS IPP. FSIS requires access to the records at least weekly.

Submits microbiological test results to FSIS headquarters monthly according to the FSIS template and instructions on how to submit (including frequency), which can be obtained by e-mailing the FSIS "SIP.Mailbox@FSIS.USDA.gov."

NOTE: Although FSIS expects that an individual establishment submitting data through the template and following instructions will not be identified, FSIS cannot guarantee that data may not be obtained through the Freedom of Information Act (FOIA).

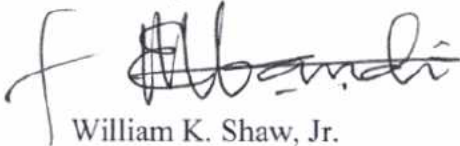
Provides FSIS 30 days prior written notice if the establishment decides to stop participation in the SIP and stop operating under the waivers.

Please be aware that if Clemens Food Group dba Hatfield Quality Meats (Est. M791) system conflicts with the provisions of the Federal Meat Inspection Act (21 U.S.C. 601, et seq.), or has repeated Noncompliance Records (NRs) documenting failure to maintain the alternative procedures or to follow the SIP Protocol, then the waivers will be revoked.

² Note: The expected level of an establishment's performance is contained in this letter or future SIP letters

If you have questions, please contact Isabel Arrington, Risk, Innovations, and Management Division (RIMD), Office of Policy and Program Development (OPPD) at (402) 344-5016 or e-mail Isabel.Arrington@fsis.usda.gov or Selena Kremer, RIMD, OPPD at (301) 504-0855 or email selena.kremer-caldwell@fsis.usda.gov.

Sincerely,



William K. Shaw, Jr.

Director

Risk, Innovations, and Management Division
Office of Policy and Program Development

Attachments:

1. SIP Protocol

cc:

Rachel Edelstein, Acting AA, OPPD

Daniel Engeljohn, AA, OFO

Armia Tawadrous, EARO, OFO

Jan Behney, DM, OFO

Paul Brinig, DDM, OFO

Susan Scarcia, DDM, OFO

(b) (6), FLS, OFO

(b) (6), IIC, OFO

Patrick Burke, RIMD, OPPD

Isabel Arrington, RIMD, OPPD

Liza Murray, RIMD, OPPD

Delila Parham, RIMD, OPPD

Nora Pihkala, RIMD, OPPD

Scott Seys, RIMD, OPPD

Selena Kremer, RIMD, OPPD

FSIS:OPPD:RIMD File: Kremer M791 SIP Letter Number 11-SIP-130-N-A.

September 27, 2012

Mr. Steve Wedeking
Technical Services Manager
Cargill Meat Solutions, M85 B
8295 Arenzville Road
Beardstown, IL 62618

Dear Mr. Wedeking:

This letter is in response to your revised *Salmonella* Initiative Program (SIP) protocol submission dated August 21, 2012, (Log Number 11-SIP-131-N-A) at Cargill Meat Solutions (Est. M85 B); Beardstown, IL and your waiver requests for the use of alternative:

- procedures for line speed and HACCP-based Inspection Models Project (HIMP) [9 CFR 310.1(b)(3)]; and
- procedures for generic *E. coli* and *Salmonella* sampling and testing [9 CFR 310.25(a) and (b)].

The Food Safety and Inspection Service (FSIS) has completed the review of your requests and is hereby granting your company an approval of the waiver of the regulations pending the Agency amendment of 9 CFR 310.1(b)(3) and 310.25(a) and (b), pursuant under 9 CFR 303.1(h).

FSIS has no objection to Est. M85 B using alternative procedures for line speed in place of 9 CFR 310.1(b)(3), alternative generic *E. coli* sampling and testing in place of 9 CFR 310.25(a), and alternative daily *Salmonella* sampling and testing procedures as described in its SIP Protocol in place of 9 CFR 310.25(b) provided the establishment:

Assesses, modifies and validates as appropriate, the Hazard Analysis and Critical Control Point (HACCP) plan according to 9 CFR 304.3 and 417.4 for:

- the SIP protocol;
- continuing CCPs for Infectious conditions (e.g. pyemia, septicemia, toxemia) (9 CFR 311.16 and 311.17), for Contamination (fecal, ingesta and milk contamination) [(9 CFR 310.11 and 310.18(a)], and for Ante-mortem Suspect (9 CFR 309.2) with zero as the critical limit (CL); and
- continuing the Slaughter Process Control Plan to meet standards of the FSIS "Market Hogs HIMP" Draft dated 06/21/05; and the alternative procedures for line speed [9 CFR 310.1(b)(3)].

Makes available and discuss with FSIS Inspection Program Personnel (IPP) at the weekly meeting or on a conference call with IPP and appropriate District Office the following:

- this SIP Letter which provides that FSIS is granting a waiver of 9 CFR 310.1(b)(3) and 310.25(a) and (b) and has no objection to Est. M85 B using the alternative procedures specified in this letter and the SIP Protocol;
- the alternative procedures the establishment will use as described above;
- the SIP Protocol which identifies the regulations waived, the alternative procedures used, the microbiological sampling and testing implemented and the establishment's agreement to share microbiological sampling and testing results and other data with FSIS; and
- the IPP Verification Overview which:
 - identifies where the establishment has elected to include its alternative procedures and SIP Protocol in its food safety system, and
 - provides specific verification procedures for verifying that the establishment is operating in a manner that is consistent with the alternative procedures and SIP Protocol.
 - **NOTE:** IPP are to verify one or more parts of the alternative procedures or other aspects of the SIP Protocol once per week using an appropriate Public Health Inspection System (PHIS) task and according to instructions in FSIS Directive 5020.1 Verification of SIP.

IPP Verification Overview:

<u>Regulation(s) Waived</u>	<u>Alternative Procedures Verified by IPP</u>	<u>Location in Food Safety System</u>	<u>Regulation(s) to Verify and Cite on NR</u>
310.1(b)(3) (line speed)	HIMP Slaughter Process Control Plan Establishment conducts monitoring according to plan and meets requirements of FSIS – Market Hogs HIMP Draft (06/21/05).	Prerequisite Program	Verify according to FSIS – Market Hogs HIMP Draft (06/21/05) 303.1(h)
310.25(b) (<i>Salmonella</i> Performance Standard)	SIP Protocol : Establishment Microbial Testing A. Frequency 1. Daily: <i>Salmonella</i>	Prerequisite Program	Verify establishment is following SIP Protocol and is therefore supporting decisions made in the hazard

	postchill samples 1 per line per shift 2. Weekly : one matched pair samples per plant for <i>Salmonella</i> , generic <i>E. coli</i> <u>B. Following Sampling and testing procedures</u> <u>C. Recording and responding to Daily <i>Salmonella</i> test results;</u> <u>D. If exceed standard:</u> 1. Increase <i>Salmonella</i> frequency to 2 samples per shift. 2. Investigate cause, document corrective actions. 3. Return to previous frequency when 2 consecutive sample sets meet standard (no more than 6 positives out of 55 samples).		analysis. 303.1(h)
310.25(a) (<i>E. coli</i> testing frequency)	Generic <i>E. coli</i> frequency per regulatory requirements.	Regulatory Requirement	Verify establishment is following 310.25 (a) testing frequency per 310.25(a) & 303.1(h).

Writes sampling procedures that identify employees designated to collect samples and address locations of sampling, how random sampling will be achieved to cover all lines and all shifts, and how the samples will be handled to ensure sample integrity for *Salmonella* and generic *E. coli*.

Conducts microbiological sampling according to the written sampling procedures and at the frequency stated below:

- Every day of production collect one *Salmonella* sample per evisceration line per shift (for a total of 2 samples per day) at the postchill location after all postchill applications the establishment has implemented to reduce microbial contamination of carcasses.
- Each week collect one pre-evisceration sample to compare results to a matched¹ postchill sample for each of the following microbes: *Salmonella* and generic *E. coli*.

¹ Pre-evisceration and postchill matched samples—postchill taken after time for carcass to travel from pre-evisceration location, through evisceration and cooler.

Records all microbiological test results.

Maintains six² or less positive *Salmonella* test results in a 55 sample set by using a moving window to count the number of positives to determine status.

Responds to greater than 6 *Salmonella* positive test results by:

- increasing the frequency of *Salmonella* testing to 4 samples per day;
- reviewing the establishment's total food safety system with consideration given to whether the waiver of requirements has caused the lack of control and take corrective and preventive actions to re-gain control and document those actions; and
- demonstrating restoration of process control by conducting at the increased testing frequency two consecutive sample sets that have 6 or less positive *Salmonella* test results in each 55 sample set. After demonstrating control, the frequency of testing can then return to 1 *Salmonella* sample per line per shift.

NOTE: At this time, it is not necessary to send *Salmonella* isolates to the FSIS Laboratory at Athens, Georgia.

Maintains records in the same manner and for the same duration as HACCP records (9 CFR 417.5).

Allows access to the records necessary to document SIP process control including microbiological test results to FSIS IPP. FSIS requires access to the records at least weekly.

Submits microbiological test results to FSIS headquarters monthly according to the FSIS template and instructions on how to submit (including frequency), which can be obtained by e-mailing the FSIS "SIP.Mailbox@FSIS.USDA.gov."

NOTE: Although FSIS expects that an individual establishment submitting data through the template and following instructions will not be identified, FSIS cannot guarantee that data may not be obtained through the Freedom of Information Act (FOIA).

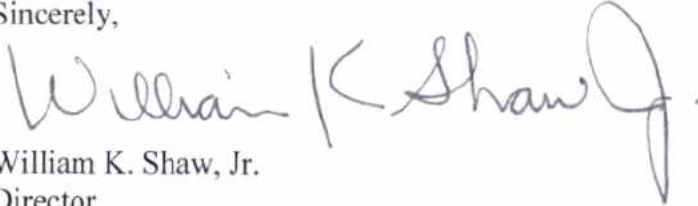
Provides FSIS 30 days prior written notice if the establishment decides to stop participation in the SIP and stop operating under the waivers.

Please be aware that if Cargill Meat Solutions (Est. M85 B) system conflicts with the provisions of the Federal Meat Inspection Act (21 U.S.C. 601, et seq.), or has repeated Noncompliance Records (NRs) documenting failure to maintain the alternative procedures or to follow the SIP Protocol, then the waivers will be revoked.

² Note: The expected level of an establishment's performance is contained in this letter or future SIP letters

If you have questions, please contact Isabel Arrington, Risk, Innovations, and Management Division (RIMD), Office of Policy and Program Development (OPPD) at (402) 344-5016 or e-mail Isabel.Arrington@fsis.usda.gov or Selena Kremer, RIMD, OPPD at (301) 504-0855 or email selena.kremer-caldwell@fsis.usda.gov.

Sincerely,

A handwritten signature in black ink that reads "William K. Shaw, Jr." The signature is fluid and cursive, with the first name "William" being the most prominent.

William K. Shaw, Jr.
Director
Risk, Innovations, and Management Division
Office of Policy and Program Development

Attachments:

1. SIP Protocol

cc:

Rachel Edelstein, Acting AA, OPPD
Daniel Engeljohn, AA, OFO
Hany Sidrak, EARO, OFO
Paul Wolseley, DM, OFO
Tamara Mayberry, DDM, OFO
(b) (6), FLS, OFO
(b) (6), IIC, OFO
Patrick Burke, RIMD, OPPD
Isabel Arrington, RIMD, OPPD
Liza Murray, RIMD, OPPD
Delila Parham, RIMD, OPPD
Nora Pihkala, RIMD, OPPD
Scott Seys, RIMD, OPPD
Selena Kremer, RIMD, OPPD

FSIS:OPPD:RIMD File: Kremer M85 B SIP Letter Number 11-SIP-131-N-A.

August 8, 2012

Mr. Brent Hood
QC Manager
Hormel Foods, M199 N
900 South Platt Avenue
Fremont, NE 68025

Dear Mr. Hood:

This letter is in response to your *Salmonella* Initiative Program (SIP) protocol submission dated November 8, 2011 (Log Number 11-SIP-128-N-A) at Hormel Foods (Est. M199 N); Fremont, NE and your waiver requests for the use of alternative:

- procedures for line speed and HACCP-based Inspection Models Project (HIMP) [9 CFR 310.1(b)(3)]; and
- procedures for generic *E. coli* and *Salmonella* sampling and testing [9 CFR 310.25(a) and (b)].

The Food Safety and Inspection Service (FSIS) has completed the review of your requests and is hereby granting your company an approval of the waiver of the regulations pending the Agency amendment of 9 CFR 310.1(b)(3) and 310.25(a) and (b), pursuant under 9 CFR 303.1(h).

FSIS has no objection to Est. M199 N using alternative procedures for line speed in place of 9 CFR 310.1(b)(3), alternative generic *E. coli* sampling and testing in place of 9 CFR 310.25(a), and alternative daily *Salmonella* sampling and testing procedures as described in its SIP Protocol in place of 9 CFR 310.25(b) provided the establishment:

Assesses, modifies and validates as appropriate, the Hazard Analysis and Critical Control Point (HACCP) plan according to 9 CFR 304.3 and 417.4 for:

- the SIP protocol;
- continuing CCPs for Infectious conditions (e.g. pyemia, septicemia, toxemia) (9 CFR 311.16 and 311.17), for Contamination (fecal, ingesta and milk contamination) [(9 CFR 310.18(a)], and for Ante-mortem Suspect (9 CFR 309.2) with zero as the critical limit (CL); and
- continuing the Slaughter Process Control Plan to meet standards of the FSIS "Market Hogs HIMP" Draft dated 06/21/05; and the alternative procedures for line speed [9 CFR 310.1(b)(3)].

Makes available and discuss with FSIS Inspection Program Personnel (IPP) at the weekly meeting or on a conference call with IPP and appropriate District Office the following:

- this SIP Letter which provides that FSIS is granting a waiver of 9 CFR 310.1(b)(3) and 310.25(a) and (b) and has no objection to Est. M199 N using the alternative procedures specified in this letter and the SIP Protocol;
- the alternative procedures the establishment will use as described above;
- the SIP Protocol which identifies the regulations waived, the alternative procedures used, the microbiological sampling and testing implemented and the establishment's agreement to share microbiological sampling and testing results and other data with FSIS; and
- the IPP Verification Overview which:
 - identifies where the establishment has elected to include its alternative procedures and SIP Protocol in its food safety system, and
 - provides specific verification procedures for verifying that the establishment is operating in a manner that is consistent with the alternative procedures and SIP Protocol.
 - **NOTE:** IPP are to verify one or more parts of the alternative procedures or other aspects of the SIP Protocol once per week using an appropriate Public Health Inspection System (PHIS) task and according to instructions in FSIS Directive 5020.1 Verification of SIP.

IPP Verification Overview:

<u>Regulation(s) Waived</u>	<u>Alternative Procedures Verified by IPP</u>	<u>Location in Food Safety System</u>	<u>Regulation(s) to Verify and Cite on NR</u>
310.1(b)(3) (line speed)	HIMP Slaughter Process Control Plan Establishment conducts monitoring according to plan and meets requirements of FSIS – Market Hogs HIMP Draft (06/21/05).	Prerequisite Program	Verify according to FSIS – Market Hogs HIMP Draft (06/21/05) 303.1(h)
310.25(b) (<i>Salmonella</i> Performance Standard)	SIP Protocol : Establishment Microbial Testing A. Frequency	Prerequisite Program	Verify establishment is following SIP Protocol and is therefore supporting decisions

310.25(a) (<i>E. coli</i> testing frequency)	1. Daily: <i>Salmonella</i> postchill samples 1 per line per shift 2. Weekly: one matched pair samples per plant for <i>Salmonella</i>, Mesophilic Aerobic Bacteria B. <u>Following Sampling and testing procedures</u> C. <u>Recording and responding</u> to Daily <i>Salmonella</i> test results; D. <u>If exceed standard:</u> 1. Increase <i>Salmonella</i> frequency to 2 samples per shift. 2. Investigate cause, document corrective actions. 3. Return to previous frequency when 2 consecutive sample sets meet standard (no more than 6 positives out of 55 samples). (Generic <i>E. coli</i> frequency is zero).		made in the hazard analysis. 303.1(h)
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Writes sampling procedures that identify employees designated to collect samples and address locations of sampling, how random sampling will be achieved to cover all lines and all shifts, and how the samples will be handled to ensure sample integrity for *Salmonella* and applicable indicator organisms (Mesophilic Aerobic Bacteria).

Conducts microbiological sampling according to the written sampling procedures and at the frequency stated below:

- Every day of production collect one *Salmonella* sample per evisceration line per shift (for a total of 1 sample per day) at the postchill location after all postchill applications the establishment has implemented to reduce microbial contamination of carcasses.

- Each week collect one pre-evisceration sample to compare results to a matched¹ postchill sample for each of the following microbes: *Salmonella* and Mesophilic Aerobic Bacteria.

NOTE: the alternative daily *Salmonella* testing, weekly Mesophilic Aerobic Bacteria testing, and weekly pre-evisceration to postchill matched samples are used in place of daily postchill generic *E. coli* testing (9 CFR 310.25(a)).

Records all microbiological test results.

Maintains six² or less positive *Salmonella* test results in a 55 sample set by using discrete sample set to count the number of positives to determine status.

Responds to greater than 6 *Salmonella* positive test results by:

- increasing the frequency of *Salmonella* testing to 2 samples per day;
- reviewing the establishment's total food safety system with consideration given to whether the waiver of requirements has caused the lack of control and take corrective and preventive actions to re-gain control and document those actions; and
- demonstrating restoration of process control by conducting at the increased testing frequency two consecutive sample sets that have 6 or less positive *Salmonella* test results in each 55 sample set. After demonstrating control, the frequency of testing can then return to 1 *Salmonella* sample per line per shift.

NOTE: At this time, it is not necessary to send *Salmonella* isolates to the FSIS Laboratory at Athens, Georgia.

Maintains records in the same manner and for the same duration as HACCP records (9 CFR 417.5).

Allows access to the records necessary to document SIP process control including microbiological test results to FSIS IPP. FSIS requires access to the records at least weekly.

Submits microbiological test results to FSIS headquarters monthly according to the FSIS template and instructions on how to submit (including frequency), which can be obtained by e-mailing the FSIS "SIP.Mailbox@FSIS.USDA.gov."

NOTE: Although FSIS expects that an individual establishment submitting data through the template and following instructions will not be identified, FSIS cannot guarantee that data may not be obtained through the Freedom of Information Act (FOIA).

¹ Pre-evisceration and postchill matched samples—postchill taken after time for carcass to travel from pre-evisceration location, through evisceration and cooler.

² Note: The expected level of an establishment's performance is contained in this letter or future SIP letters

Provides FSIS 30 days prior written notice if the establishment decides to stop participation in the SIP and stop operating under the waivers.

Please be aware that if Hormel Foods (Est. M199 N) system conflicts with the provisions of the Federal Meat Inspection Act (21 U.S.C. 601, et seq.), or has repeated Noncompliance Records (NRs) documenting failure to maintain the alternative procedures or to follow the SIP Protocol, then the waivers will be revoked.

If you have questions, please contact Isabel Arrington, Risk, Innovations, and Management Division (RIMD), Office of Policy and Program Development (OPPD) at (402) 344-5016 or e-mail Isabel.Arrington@fsis.usda.gov or Selena Kremer, RIMD, OPPD at (301) 504-0855 or email selena.kremer-caldwell@fsis.usda.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "William K. Shaw, Jr.", with a stylized flourish at the end.

William K. Shaw, Jr.
Director
Risk, Innovations, and Management Division
Office of Policy and Program Development

Attachments:

1. SIP Protocol

cc:

Rachel Edelstein, Acting AA, OPPD

Daniel Engeljohn, AA, OFO

Hany Sidrak, EARO, OFO

Dawn Sprouls, DM, OFO

Khalid Masood, DDM, OFO

Rosemary Turner, DDM, OFO

(b) (6), FLS, OFO

(b) (6), IIC, OFO

(b) (6), Relief IIC, OFO

Patrick Burke, RIMD, OPPD

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Delila Parham, RIMD, OPPD

Nora Pihkala, RIMD, OPPD

Scott Seys, RIMD, OPPD

Selena Kremer, RIMD, OPPD

FSIS:OPPD:RIMD File: Kremer M199 N SIP Letter Number 11-SIP-128-N-A.

October 11, 2012

Mr. Kevin Mead
Director of QA and Technical Services
Clougherty Packing, LLC, M360
3409 E. Vernon Avenue
Los Angeles, CA 90058

Dear Mr. Mead:

This letter is in response to your *Salmonella* Initiative Program (SIP) protocol submission dated November 7, 2011, (Log Number 11-SIP-129-N-B which supersedes all other log numbers) at Clougherty Packing, LLC (Est. M360); Los Angeles, CA and your waiver requests for the use of alternative:

- procedures for line speed and HACCP-based Inspection Models Project (HIMP) [9 CFR 310.1(b)(3)]; and
- procedures for generic *E. coli* and *Salmonella* sampling and testing [9 CFR 310.25(a) and (b)].

The Food Safety and Inspection Service (FSIS) has completed the review of your requests and is hereby granting your company an approval of the waiver of the regulations pending the Agency amendment of 9 CFR 310.1(b)(3) and 310.25(a) and (b), pursuant under 9 CFR 303.1(h).

FSIS has no objection to Est. M360 using alternative procedures for line speed in place of 9 CFR 310.1(b)(3), alternative generic *E. coli* sampling and testing in place of 9 CFR 310.25(a), and alternative daily *Salmonella* sampling and testing procedures as described in its SIP Protocol in place of 9 CFR 310.25(b) provided the establishment:

Assesses, modifies and validates as appropriate, the Hazard Analysis and Critical Control Point (HACCP) plan according to 9 CFR 304.3 and 417.4 for:

- the SIP protocol;
- continuing CCPs for Infectious conditions (e.g. pyemia, septicemia, toxemia) (9 CFR 311.16 and 311.17), for Contamination (fecal, ingesta and milk contamination) [(9 CFR 310.11 and 310.18(a)], and for Ante-mortem Suspect (9 CFR 309.2) with zero as the critical limit (CL); and

- continuing the Slaughter Process Control Plan to meet standards of the FSIS “Market Hogs HIMP” Draft dated 06/21/05; and the alternative procedures for line speed [9 CFR 310.1(b)(3)].

Makes available and discuss with FSIS Inspection Program Personnel (IPP) at the weekly meeting or on a conference call with IPP and appropriate District Office the following:

- this SIP Letter which provides that FSIS is granting a waiver of 9 CFR 310.1(b)(3) and 310.25(a) and (b) and has no objection to Est. M360 using the alternative procedures specified in this letter and the SIP Protocol;
- the alternative procedures the establishment will use as described above;
- the SIP Protocol which identifies the regulations waived, the alternative procedures used, the microbiological sampling and testing implemented and the establishment’s agreement to share microbiological sampling and testing results and other data with FSIS; and
- the IPP Verification Overview which:
 - identifies where the establishment has elected to include its alternative procedures and SIP Protocol in its food safety system, and
 - provides specific verification procedures for verifying that the establishment is operating in a manner that is consistent with the alternative procedures and SIP Protocol.
 - NOTE:** IPP are to verify one or more parts of the alternative procedures or other aspects of the SIP Protocol once per week using an appropriate Public Health Inspection System (PHIS) task and according to instructions in FSIS Directive 5020.1 Verification of SIP.

IPP Verification Overview:

<u>Regulation(s) Waived</u>	<u>Alternative Procedures Verified by IPP</u>	<u>Location in Food Safety System</u>	<u>Regulation(s) to Verify and Cite on NR</u>
310.1(b)(3) (line speed)	HIMP Slaughter Process Control Plan Establishment conducts monitoring according to plan and meets requirements of FSIS – Market Hogs HIMP Draft (06/21/05).	Prerequisite Program	Verify according to FSIS – Market Hogs HIMP Draft (06/21/05) 303.1(h)

310.25(b) (<i>Salmonella</i> Performance Standard)	SIP Protocol : Establishment Microbial Testing A. Frequency 1. <u>Daily:</u> <i>Salmonella</i> postchill samples 1 per line per shift 2. <u>Weekly:</u> one matched pair samples per plant for <i>Salmonella</i>, Mesophilic Aerobic Bacteria B. <u>Following Sampling and testing procedures</u> C. <u>Recording and responding</u> to Daily <i>Salmonella</i> test results; D. <u>If exceed standard:</u> 1. Increase <i>Salmonella</i> <i>frequency</i> to 2 samples per shift. 2. Investigate cause, document corrective actions. 3. Return to previous frequency when 2 consecutive sample sets meet standard (no more than 6 positives out of 55 samples).	Prerequisite Program	Verify establishment is following SIP Protocol and is therefore supporting decisions made in the hazard analysis. 417.5(a) & 303.1(h)
310.25(a) (<i>E. coli</i> testing frequency)	(Generic <i>E. coli</i> frequency is zero).		

Writes sampling procedures that identify employees designated to collect samples and address locations of sampling, how random sampling will be achieved to cover all lines and all shifts, and how the samples will be handled to ensure sample integrity for *Salmonella* and applicable indicator organisms (Mesophilic Aerobic Bacteria).

Conducts microbiological sampling according to the written sampling procedures and at the frequency stated below:

- Every day of production collect one *Salmonella* sample per evisceration line per shift (for a total of 1 sample per day) at the postchill location after all postchill applications the establishment has implemented to reduce microbial contamination of carcasses.

- Each week collect one pre-evisceration sample to compare results to a matched¹ postchill sample for each of the following microbes: *Salmonella* and Mesophilic Aerobic Bacteria.

NOTE: the alternative daily *Salmonella* testing, weekly Mesophilic Aerobic Bacteria testing, and weekly pre-evisceration to postchill matched samples are used in place of daily postchill generic *E. coli* testing (9 CFR 310.25(a)).

Records all microbiological test results.

Maintains six² or less positive *Salmonella* test results in a 55 sample set by using discrete sample set to count the number of positives to determine status.

Responds to greater than 6 *Salmonella* positive test results by:

- increasing the frequency of *Salmonella* testing to 2 samples per day;
- reviewing the establishment's total food safety system with consideration given to whether the waiver of requirements has caused the lack of control and take corrective and preventive actions to re-gain control and document those actions; and
- demonstrating restoration of process control by conducting at the increased testing frequency two consecutive sample sets that have 6 or less positive *Salmonella* test results in each 55 sample set. After demonstrating control, the frequency of testing can then return to 1 *Salmonella* sample per line per shift.

NOTE: At this time, it is not necessary to send *Salmonella* isolates to the FSIS Laboratory at Athens, Georgia.

Maintains records in the same manner and for the same duration as HACCP records (9 CFR 417.5).

Allows access to the records necessary to document SIP process control including microbiological test results to FSIS IPP. FSIS requires access to the records at least weekly.

Submits microbiological test results to FSIS headquarters monthly according to the FSIS template and instructions on how to submit (including frequency), which can be obtained by e-mailing the FSIS "SIP.Mailbox@FSIS.USDA.gov."

NOTE: Although FSIS expects that an individual establishment submitting data through the template and following instructions will not be identified, FSIS cannot guarantee that data may not be obtained through the Freedom of Information Act (FOIA).

¹ Pre-evisceration and postchill matched samples—postchill taken after time for carcass to travel from pre-evisceration location, through evisceration and cooler.

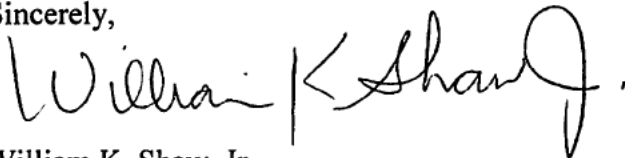
² Note: The expected level of an establishment's performance is contained in this letter or future SIP letters

Provides FSIS 30 days prior written notice if the establishment decides to stop participation in the SIP and stop operating under the waivers.

Please be aware that if Clougherty Packing, LLC (Est. M360) system conflicts with the provisions of the Federal Meat Inspection Act (21 U.S.C. 601, et seq.), or has repeated Noncompliance Records (NRs) documenting failure to maintain the alternative procedures or to follow the SIP Protocol, then the waivers will be revoked.

If you have questions, please contact Isabel Arrington, Risk, Innovations, and Management Division (RIMD), Office of Policy and Program Development (OPPD) at (402) 344-5016 or e-mail Isabel.Arrington@fsis.usda.gov or Selena Kremer, RIMD, OPPD at (301) 504-0855 or email selena.kremer-caldwell@fsis.usda.gov.

Sincerely,



William K. Shaw, Jr.
Director
Risk, Innovations, and Management Division
Office of Policy and Program Development

Attachments:

1. SIP Protocol

cc:

Rachel Edelstein, Acting AA, OPPD
Daniel Engeljohn, AA, OFO
Hany Sidrak, EARO, OFO
Yudhbir Sharma, DM, OFO
Abdalla Amin, DDM, OFO
Frank Gillis, DDM, OFO
Adel Malak, DDM, OFO
(b) (6) FLS, OFO
(b) (6) IIC, OFO
Patrick Burke, RIMD, OPPD
Isabel Arrington, RIMD, OPPD
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Delila Parham, RIMD, OPPD
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