

IKE Scenario 01-09: Conducting weekly meetings to discuss the review of data generated by prerequisite programs that may affect the hazard analysis and food safety.

IKE scenarios are a tool that FSIS inspection program personnel can use to better understand Agency policy. In addition, the IKE scenario result may be just one approach to address a specific situation and is not intended to be a definitive answer, indicating there may be multiple approaches.

Purpose: FSIS Directive 5000.2, Rev. 2, Review of Establishment Testing Data by Inspection Program Personnel, provides the basis for this scenario.
(<http://www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/5000.2Rev2.pdf>)

Situation: You are a GS-9 relief Consumer Safety Inspector (CSI) assigned to a large sliced deli meat establishment. You scheduled a weekly meeting with plant management after you perform a scheduled 03G01 procedure. You decide to verify the recordkeeping requirement and proceed to the on-site laboratory dedicated to company testing. While standing in the lab, you also observe APC plates resting by the colony counter and incubator. You request the APC records, but the QA staff refuses.

At this point, you proceed to the weekly meeting.

Resolution: During the meeting, you provide a copy of FSIS Directive 5000.2, Rev. 2. The establishment representative states that he is not familiar with the revised directive.

During the meeting, you state that you have observed environmental swabbing in the post-lethality slicing and packaging room and APC plates in the lab today. You state that you would like to see the results of that testing.

Establishment management informs you that a purchaser of deli meat from the establishment requires quantitative tests for APC. Management expresses its understanding that these records are not subject to FSIS review because they were created for a client.

You advise management that the records are subject to review by FSIS because they could reveal that an insanitary condition exists or is developing, and because they are records that bear on whether a hazard is reasonably likely to occur under 9 CFR 417.5(a)(1). The APC results reflect the sanitary conditions within the post-lethality processing environment and would likely affect the assessment of the hazard analysis at the slicing and packaging step of the process.

Establishment management agrees to provide the APC records and sends the HACCP coordinator to retrieve the records from the food safety office.

Access the IKE Scenario home page and review previously posted IKEs from
(http://www.fsis.usda.gov/FSIS_Employees/IKE_Scenarios/index.asp)

This information should also be shared with establishment management.