

National Advisory Committee on Meat and Poultry Inspection
January 16 – 17, 2013
Washington, DC

Subcommittee on Strengthening Verification of Sanitary Dressing and Antimicrobial Interventions for Veal Slaughter

Report and Recommendations

Recognizing that pre-harvest practices can impact pathogen load in the gut and therefore potential pathogen contamination of the carcass, the agency should conduct a series of stakeholder meetings to facilitate knowledge sharing and capturing to better address the data gap that exists for this specific class of beef. The committee encourages the agency to investigate and develop recommendations for pre-harvest interventions and, in addition to the above stated research plan, ensure discussions with interested stakeholder meetings on this topic. Further, the committee recognizes potential differences between the subgroups bob veal and formula fed veal within the veal class and recommends the agency focus its efforts at the stakeholder meetings on this topic with intent to capture both optimum in-plant sanitary dressing procedures and pre-harvest best practices, and to achieve a measureable pathogen reduction by 2014.

Question 1:

What improvements can be made to the existing sanitary dressing verification procedures (FSIS PHIS Directive 6410.1) to address unique aspects of veal slaughter and processing?

- Are there instructions that do not apply to veal slaughter establishments?
- Are there instructions that need to be added to address unique aspects of veal slaughter and processing?
- Should the frequency of sanitary dressing verification be different for veal as compared with beef?

Response:

The subcommittee agrees that the current regulatory requirements applicable to beef slaughter operations are equally applicable for veal slaughter operations. The subcommittee recommends that FSIS revise Directive 6410.1 to include more veal industry specific language so that there is a clear understanding by FSIS In-Plant Personnel (IPP) of its applicability to veal slaughter operations.

The subcommittee does not believe that the frequency of sanitary dressing verification should be different for veal as compared with beef.

Question 2:

What improvements can be made to the draft notice on verifying veal slaughter sanitary dressing to address any additional unique aspects of veal slaughter and processing not currently in the document?

Response:

The subcommittee recognizes the need to modify the draft notice on verifying veal slaughter sanitary dressing to more effectively communicate FSIS regulatory information to small and very small plants and to include more visual aids (i.e. photographs). Additionally the Agency should work within its small plant outreach division to develop appropriate educational and training materials.

The subcommittee recommends that FSIS should seek veal industry expertise on the best practice on sanitary dressing procedures.

The subcommittee also supports an analysis of sanitary dressing verification frequency data to establish a baseline. After some predetermined timeframe (i.e. 90 days) the Agency should reevaluate the data and determine the need for further modification to the sanitary dressing verification frequencies. The subcommittee recommendation is that the verification frequency may be increased based on establishment specific performance.

Question 3:

What improvements can be made to the 2002 beef slaughter compliance guidance document to address unique aspects of veal slaughter?

- Is there guidance that does not apply to veal slaughter establishments?
- Is there guidance that needs to be added to address unique aspects of veal slaughter?
- Are there other changes to the guidance that are needed in addition to the changes currently under consideration?

Response:

See response to Question 1. Additionally, the Agency should make its necessary changes to the compliance guidance, noting the changes, and incorporate veal specific guidance language. The subcommittee recommends that the Agency then submit the modified compliance guidelines for stakeholder comment and suggestion.

Question 4:

Are there differences in the classes of veal (bob veal, formula fed, non-formula fed, and heavy calf) that impact slaughter and should be pointed out in FSIS policy documents?

Response:

The subcommittee recognizes there are specific challenges that impact slaughter with each veal classification, but the data currently provided by FSIS is insufficient to define risk among the various classes. If FSIS identifies areas within their existing tools where more specific language is needed in the subclasses of veal, the agency should include that language.

The subcommittee recommends that the Agency confer with ARS or other research providers to conduct research into pre-harvest risk factors associated with STEC in veal slaughter. The subcommittee also recommends that the Agency promote research into the development of industry best management practices

As a long term goal, the Agency should address the animal drug residue challenge in bob veal calves.

Question 5:

What innovative strategies can the Agency use to help industry (comprised of small and very small establishments) and FSIS inspection personnel better understand the needs for slaughtering animals used to produce veal products?

Response:

The committee recommends that the Agency work within its small and very small plant outreach division to develop communications targeted to veal slaughter establishments. The material developed should be short and concise where possible. The guidance and tools should include visual materials, plain language (i.e. non-regulatory) guidance documents. FSIS should also develop webinars, DVDs, regional meetings and partnering with state extension services and other appropriate venues to deliver this information.