Raw Chicken Parts Exploratory Sampling Project and Comminuted Poultry Sampling: clarifications on FAQs

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Risk, Innovations, and Management Staff, OPPD
Questions received

• 102 questions on parts sampling
  • 12 – eligibility of marinated parts
  • 12 – test and hold/regulatory action
  • 11 – requesting sampling supplies
  • 10 – new sampling algorithm
  • 9 – sampling repackaged parts/what is considered portioned
  • 5 – sampling at further processing establishment
  • 33 – product eligibility
  • 10 – sampling method
Questions received

• 25 more questions on the comminuted sampling code and its association with chicken parts sampling
Marinating – Q&A issued on 4/24/15

Q: An establishment marinates, injects, or vacuum tumbles chicken parts in different solutions or dry spice mixture. It marinates some in milky white or cloudy solutions, some in non-clear (e.g., brown or red) solutions, and some with spice that may or may not be in solutions resulting with visible spice particles. Are these products eligible for sampling?

A: If the raw nature of the product is evident, then the product is eligible for sampling.
Raw Chicken Parts Sampling Project (HC_CPT_LBW01)

Test and hold/regulatory action

- Chicken parts are **not** subject to test and hold policy
  - Policy applies only to Agency tested products for adulterants
  - Raw products that are subject to FSIS sampling for *Salmonella* and *Campylobacter* are not subject to test and hold requirements – including chicken parts
- **Notice 56-14**, CONTROL OF AGENCY TESTED PRODUCTS FOR ADULTERANTS
Raw Chicken Parts Sampling Project  
(HC_CPT_LBW01)

test and hold/regulatory action

• Individual sample results will not lead to regulatory control actions
  • As indicated in Notice 16-15

• Results are being shared with establishments via LIMS-Direct
## Raw Chicken Parts Sampling Project
(HC_CPT_LBW01)

### New sampling task assignment algorithm

#### Quick look:

<table>
<thead>
<tr>
<th>Old approach</th>
<th>New approach</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Assigning a fixed number of samples each month or in a “set”</strong></td>
<td>Assign a variable number of samples each month</td>
</tr>
</tbody>
</table>
| For example, assign 4 samples for each establishment every month | • Volume based  
• Other risk factor-based  
• Some establishments may get no samples assigned each month  
• Some may get a different number of samples assigned each month |
Raw Chicken Parts Sampling Project
(HC_CPT_LBW01)

Requesting sampling supplies

• For the raw chicken parts sampling project, the FSIS labs will send the correct number of sampling supplies boxes out each month, prior to the sampling tasks appearing in PHIS
• IPP do not need to routinely request supplies
• Tailored to each establishment, each month
• Labs do not send a new box out each time a sample comes in
Raw Chicken Parts Sampling Project (HC_CPT_LBW01)

Requesting sampling supplies

Q: What if sampling supplies are lost or damaged and cannot be used?

A: IPP then request sampling supplies through PHIS, when possible. (First, it needs to be scheduled in the Task Calendar). This is more preferable than requesting them through Outlook.
Q: Why hasn’t the establishment I’m assigned to been assigned chicken parts sampling tasks in PHIS yet, since they make an eligible product?

A: Not every establishment will get a sampling task every month, based on the new algorithm.

- Sampling tasks are still assigned monthly, around the 3<sup>rd</sup> week or so of the month.
- IPP should not request sampling supplies unless samples have been assigned in PHIS and the samples have not arrived in time for sampling to begin.
- The labs work from a list provided by ODIFP. If IPP request supplies for an est not on the list, the labs will not ship them.
Sampling at further processing (not slaughter) establishments

Q: Are finished chicken parts produced at an establishment that only further processes (does not slaughter) eligible for sampling?

A. Yes. This means it is possible, but not likely, that parts could be sampled at the supplying slaughter establishment as well as at further processing.
Sampling repackaged parts

Q: Are parts that are repackaged or portioned eligible for sampling?

A. No, if they are not also otherwise processed. If they are otherwise processed (for example, by cutting up, deboning, marinating, tenderizing, etc), then they are eligible for sampling.

From the notice: “D. Parts that are portioned only or repackaged only are not eligible for sampling.”
What is considered portioning?

• Portioning refers to product from a larger package broken down into smaller packages but not processed (marination, deboning, tenderizing, etc)
Parts Eligibility

• NOT ELIGIBLE
  • Stuffed products
  • Any kind of heat treated product, whether RTE or NRTE (including par-fried)
  • Quarters, as defined in 9 CFR 381.170(b)
    • Breast with portion of backbone attached
    • Whole leg (drum + thigh) with portion of backbone attached
  • Turkey parts – recent issue with this
  • Frozen chicken parts
  • B/L/W trimmings or other parts that would not typically be available for consumer purchase
Define “typically available for consumer purchase”

- Based on judgment of IPP as to whether a chicken part is of a kind that one would typically find available for consumer purchase
- Whether it is actually packaged for consumers (or is in a combo bin or other bulk packaging) does not matter

Example: bone-in, skin-on chicken thighs. These are products that would typically be available for consumer purchase. Even if all these are going for further processing, they are still eligible because they are a product typically available for consumer purchase
Raw Chicken Parts Sampling Project
(HC_CPT_LBW01)

Parts Eligibility

• **ELIGIBLE**
  • Parts from fowl
  • Salvaged parts (as close to finished product as possible), but not from the salvage area
  • Thighs with portion of backbone attached
Q: What about finished parts that go through IQF process. Are they eligible for sampling?

A: It depends. If an establishment is receiving-in raw chicken source materials (parts or otherwise) and is cutting, trimming, marinating or otherwise processing product before putting it into the IQF process, then it is eligible for sampling. Parts collection would occur before it goes into IQF.

When possible, it should be collected after parts are placed on the conveyor to go into the IQF process, when possible.
Q: If an establishment receives-in parts and the establishment just puts them directly into the IQF process without any further processing, are the parts eligible for sampling?

A: No, because they are not being processed at the receiving establishment in any other way besides going into IQF.
Q: At what point in the process should chicken parts be collected?

A: As close to finished as possible and after all interventions have been applied.

*Collect from the same spot on a given line. Across all lines, collect from a consistent and equivalent point in the process, if possible.
Comminuted Chicken and Turkey Sampling (NRTE_EXP_CH and NRTE_EXP_TU)

Status:

• Sampling of comminuted poultry ongoing through at least May, under these sampling codes

<table>
<thead>
<tr>
<th>Product</th>
<th>PHIS Sampling project code</th>
<th>Label on sampling supplies</th>
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<tbody>
<tr>
<td>Comminuted chicken</td>
<td>NRTE_EXP_CH</td>
<td>NCPESP</td>
</tr>
<tr>
<td>Comminuted turkey</td>
<td>NRTE_EXP_TU</td>
<td>NCPESP</td>
</tr>
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</table>

• Sampling will change in the near future (as soon as June)
• An FSIS Notice will issue first
Comminuted Chicken and Turkey Sampling
(NRTE_EXP_CH and NRTE_EXP_TU)

Questions and Issues

Q: My establishment produces injected chicken parts but getting NRTE_EXP_CH code. What is this code, and why am I getting this sampling task?

A: This is the sampling code for comminuted chicken, so comminuted chicken sampling tasks were assigned. If no comminuted product is produced, IPP should cancel the comminuted poultry sampling tasks.

Therefore, establishment producing any type of raw non-intact chicken or turkey received these sampling tasks. (The Agency anticipated implementing new sampling codes shortly following IPP updating the PHIS profile.)
Comminuted Chicken and Turkey Sampling
(NRTE_EXP_CH and NRTE_EXP_TU)

Questions and Issues

• Requesting comminuted sampling supplies for parts samples (and vice versa)

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<td>NCPESP</td>
</tr>
<tr>
<td>Chicken parts</td>
<td>HC_CPT_LBW01</td>
<td>RCPSP</td>
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Questions and Issues

Q: Can I collect a comminuted sample and a carcass sample in the same week?
A: Yes. These should be considered separately from each other for sample collection purposes.

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<td>NCPESP</td>
</tr>
<tr>
<td>Chicken carcass</td>
<td>HC_CH_COM01</td>
<td>HACCP_CH</td>
</tr>
<tr>
<td>Turkey carcass</td>
<td>HC_TU_COM01</td>
<td>HACCP_TU</td>
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## Comminuted Chicken and Turkey Sampling

### Coming changes to comminuted sampling *(briefly)*
- Separation of MSK from ground and other comminuted products

<table>
<thead>
<tr>
<th>Product</th>
<th>current sampling project code</th>
<th>NEW sampling project code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comminuted chicken</td>
<td>NRTE_EXP_CH</td>
<td>HC_CH_COM01 (but ONLY for ground and other comminuted products)</td>
</tr>
<tr>
<td>Comminuted turkey</td>
<td>NRTE_EXP_TU</td>
<td>HC_TU_COM01</td>
</tr>
<tr>
<td></td>
<td></td>
<td>HC_CH_COM01 (but ONLY for ground and other comminuted products)</td>
</tr>
<tr>
<td>MSC</td>
<td>NRTE_EXP_CH</td>
<td>EXP_CH_MSK01 (but ONLY for MSC)</td>
</tr>
<tr>
<td></td>
<td>(Not specific to MSC)</td>
<td></td>
</tr>
<tr>
<td>MST</td>
<td>NRTE_EXP_TU</td>
<td>EXP_TU_MSK01 (but ONLY for MST)</td>
</tr>
<tr>
<td></td>
<td>(Not specific to MST)</td>
<td></td>
</tr>
</tbody>
</table>
Some clarifications on carcass sampling

Udit Minocha, Ph.D.
Risk, Innovations, and Management Staff, OPPD
Q: Notice 16-15 or Notice 22-15 – Which one do I apply for raw chicken parts sampling instructions?

A: Notice 16-15 contains sampling instructions for raw chicken parts.

Notice 22-15 only announces the change from sets to moving window (and replacement sampling codes) – it does not contain sampling instructions.
Poultry carcass sampling
(HC_CH_CARCO1 and HC_TU_CARCO1)

Q: Where did HC11_CH and HC11_TU go?

A: HC11_CH and HC11_TU are gone. They have been replaced by new Project Codes:
   - Young Chicken Carcasses (HC_CH_CARCO1)
   - Young Turkey Carcasses (HC_TU_CARCO1)

Note: There are no changes to either carcass sampling program other than the Project Codes.

<table>
<thead>
<tr>
<th>Product</th>
<th>Project Codes</th>
<th>Implementation Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Young Chicken Carcasses</td>
<td>HC_CH_CARCO1</td>
<td>May 1, 2015</td>
</tr>
<tr>
<td>Young Turkey Carcasses</td>
<td>HC_TU_CARCO1</td>
<td>May 1, 2015</td>
</tr>
</tbody>
</table>
Q: How will establishments know if they are falling outside the initial performance standards for chickens and when will FSIS begin posting categories on their website for carcasses?

- 52 samples are not required
- 10 or more samples with $\leq 15.4\%$ positive for Salmonella and 13 or more samples with $\leq 7.7\%$ positive for Campylobacter.
Q: What should IPP do if they receive sampling requests for parts and carcasses for the same day?

A: It is fine to take multiple samples on the same day if the project codes are different, i.e., HC_CH_CARC01 and HC_CPT_LBW01. Each sampling project will be analyzed independently of other sampling projects.
Raw Chicken Parts Exploratory Sampling Project, Comminuted Poultry Sampling, and Chicken and Turkey Carcass Sampling

Questions?
Submit through AskFSIS

Subject Field: Enter **Notice number**
Question Field: Enter question with as much detail as possible.
Product Field: Select **General Inspection Policy** from the drop-down menu.
Category Field: Select **Sampling - Salmonella** from the drop-down menu.
Policy Arena: Select **Domestic (U.S.) Only** from the drop-down menu.

or call 1800-233-3935