



Weekly Meetings

Cover

Food Safety and Inspection Service

Small Plant News



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Weekly Meetings

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Overview

Since the onset of the Hazard Analysis and Critical Control Point (HACCP)-based verification of regulatory compliance, the United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) staffs have scheduled weekly meetings with owners and managers at establishments. Does your plant maximize the potential of the weekly meeting?

The purpose of the weekly meeting is to provide inspectors with the opportunity to address ongoing compliance with FSIS requirements. The informal meeting environment is designed to promote an open dialogue and encourage the exploration of areas of concern and interest. Don't waste this opportunity to understand your inspector's viewpoint.

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FSIS inspectors may also utilize the weekly meeting to share their professional observations and insights. You may choose to initiate an inquiry, request clarification, or share information about your operation as well.

Potential Topics for Discussion

FSIS Directive 5010.1 (*Food Safety Related Topics for Discussion during Weekly Meetings*) provides examples of the type of discussions that may be appropriate for the weekly sessions. These meetings must be responsive to the constant change and unique circumstances in each individual establishment.

Your inspector(s) will only utilize the Directive for guidance. They will work with you, and rely on their professional judgment and knowledge of the plant, to determine the exact content of meeting agendas. Examples of possible topics your inspector(s) might pursue include:

- 1) In-plant observations, including, but not limited to:
 - a. Individual noncompliance records;
 - b. Developing trends of noncompliance (i.e., noncompliances that are somehow associated with or indicative of a noncompliance trend);
 - c. FSIS findings that do not rise to the level of noncompliance but warrant discussion (e.g., less-than-perfect conditions that may, if not addressed, become noncompliances);
 - d. Humane handling issues, including those that do not rise to the level of noncompliance but warrant discussion; and
 - e. Issues related to the implementation and verification of less-than-daily sanitation procedures.
 - 2) Issues and information that the establishment wishes to share;
 - 3) Agency issuances, including, but not limited to:
 - a. Policy clarifications published in askFSIS;
 - b. New, revised, or amended FSIS Directives or FSIS Notices;
 - c. New, revised, or amended FSIS Compliance Guides;
 - d. New, revised, or amended import policies;
 - e. New policy PowerPoint presentations that promote a uniform understanding of FSIS issuances;
 - f. Small and very small plant outreach information; and
 - g. Updated FSIS policy presented in the FSIS *Constituent Update*.
- 4) Information regarding FSIS sampling:
- a. Results received through Laboratory Information Management System-Direct (LIMS-Direct);
 - b. Changes to Products and Product Volumes in the Plant Profile;
 - c. *Escherichia coli* (*E. coli*) O157:H7 results, also available through the *Constituent Update*, posted on the Microbiological Testing Program for *E. coli* O157:H7 and non-O157 Shiga toxin-producing *E. coli* (STEC) website;
 - d. *Salmonella* results, also available through the *Constituent Update*, posted on the *Salmonella* Verification Testing Program: Monthly reports for Establishments by Performance Category website;
 - e. Notification through LIMS-Direct of violative residue sample results, or import port-of-entry sample violations and information posted on the FSIS Repeat Violator List for Use by FSIS Personnel and the FSIS Repeat Violator List for Use by Livestock Markets and Establishments; and
 - f. Notification that Routine Risk Based *Listeria monocytogenes* (RLm) and Intensified Verification Testing (IVT) testing will be conducted as a result of a positive *Listeria monocytogenes* sample in Ready-to-Eat product.
- 5) Information related to the establishment's food safety system. Examples might include, but are not limited to:
- a. Implementation of, and changes to, any of the establishment's prerequisite programs (e.g., Allergen controls, Specified Risk Materials, Certificates of Analysis) that are in place to support food safety decisions;
 - b. Changes to the establishment's product line, processing methods used, or other changes such as product flow, equipment configuration, or treatment of product, which could impact the establishment's food safety system;
 - c. New Technology Summaries (i.e., "no objection" letters), available through the FSIS

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Intranet, that may help the establishment improve food safety. This discussion would include a mutual understanding of specific process parameters or critical limits that are part of these “no objection” letters;

- d. Changes to in-plant regulatory waivers or new technology trials; and
 - e. Changes to facility or equipment.
- 6) Information from external sources such as:
- a. Complaints from consumers or the establishment’s customers (e.g., institutions such as hospitals or nursing homes, restaurants, schools, grocery stores, distributors or wholesalers); and
 - b. Current Recalls, including those that have involved product received by the establishment, product similar to product produced by the establishment, or product held for re-inspection by FSIS at an import establishment. Further areas for discussion may include:
 - i. Any required follow up FSIS testing or increased or intensified testing on imported products;
 - ii. Any establishment testing (e.g., hold and test) or voluntary hold and test requirements for imported products;
 - iii. Any planned actions associated with the recalled product that has been received by the establishment; and
 - iv. Discussion with plant management regarding how it can use information from recalls of products similar to those produced at the establishment as a mechanism to improve its own operation.
- 7) Any inspection-related activities occurring outside of approved hours of operation (e.g., request for overtime or an inspector becoming aware of activities that occurred after the approved hours).

It’s important for you to understand that the weekly meeting is not meant to replace the documentation of noncompliance records. Further, your inspectors are under no obligation to discuss an issue in the weekly meeting before issuing a noncompliance record.

Documenting Your Weekly Meetings

As outlined in FSIS Directive 5000.1, Revision 4 (*Verifying an Establishment’s Food Safety System*) for meat, poultry, and import establishments and, in accordance with the policy addressed in FSIS Notice 41-09 for egg products plants, the content of the weekly meeting must be documented in a Memorandum of Interview (MOI). This is basically a document that records the factual specifics of an event. It should be free of opinions, conclusions, or extraneous material.

The MOI is required to include the date of the meeting, attendees and the details of the proceedings. Your inspector will enter the MOI into the Public Health Information System and provide you with a copy. You can object to the content of any part of the MOI. Inspectors will document the objection and add it to the MOI or add it as an attachment. Don’t expect inspection staff to address the issue(s) in the complaint. They will, however, acknowledge receipt of your objection and provide you with a copy of the amended MOI.

If your plant has more than one shift, Agency supervisory staff will designate the on site inspector responsible for conducting the weekly meeting. Coordinate your resources and staff availability to respond to this decision. Dependent upon operational specifics in your two-shift plant, it may be appropriate to have two separate meetings. In this circumstance, each meeting will generate a separate MOI. It will be important for you to communicate and coordinate the content of these separate meetings to your combined staff.

FSIS is aware that you may have some reservations about the content of these weekly meeting MOI(s), especially when they contain what you consider to be sensitive information. The Freedom of Information Act (FOIA) does provide access to virtually all Federal agency records; except those protected by legal exemptions and exclusions.

Therefore, it’s important that you understand FOIA. The Agency’s transparency is continually balanced with the public’s interest in preserving the privacy and confidentiality of sensitive, personal, and commercial information; the integrity of Government’s decision-making process; and the secrecy of law enforcement activity. Certain content is protected by law from release to the public. A request under FOIA may not be granted, or the documents may be granted after having portions deleted.

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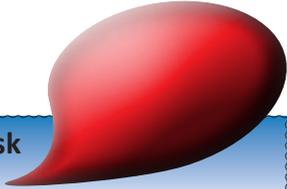
Benefiting From Weekly Meetings

You have invested substantial resources into your business. It's essential that you continue proactively to invest the time and energy required to comply with an ever-evolving regulatory environment. The weekly meeting can be an important part of that effort. Here are a few tips that will help you get the most out of your weekly meetings:

- Use the weekly meeting as part of an open-door policy with inspectors. Assure them that you are always available to respond to their inquiries.
- Document the proceedings of the weekly meetings. Take detailed notes and provide copies to your inspection personnel.
- Designate those individuals in your operation who will attend all the weekly meetings. You may want more than one participant. The meetings are informal, and a separate witness to the proceedings can be helpful.
- Use the meetings to apprise inspection staff of progress you have made on any outstanding issues. This will assist their efforts in filing progress reports and demonstrate that you are responsive to their observations.
- Ask your inspection staff questions. They can provide helpful insight and share important observations. This can be of great benefit to your operation.
- Institute a time-sensitive review of what transpired at the weekly meeting and discuss possible implications with your staff.
- Formulate a methodology to address issues or concerns identified by inspection staff during the meeting.

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