VERIFICATION ACTIVITIES FOR THE SANITARY AIR INFLATION OF LIVESTOCK CARCASSES AND PARTS

I. PURPOSE

This directive provides instructions to inspection program personnel (IPP) regarding how to perform sanitation verification in establishments that use air to inflate carcasses or parts of carcasses of livestock to facilitate, for example, the removal of hides or disassembly of the carcass.

II. [RESERVED]

III. [RESERVED]

IV. REFERENCES

9 CFR Parts 310.13(a) and 310.13 (b) (2)  
FSIS Directive 5000.1 “Verifying an Establishments’ Food Safety System” (Chapter I, Part XI “Equipment and Utensils”)

V. BACKGROUND

A. In response to a petition to the Agency, the Food Safety and Inspection Service (FSIS) published in the Federal Register (FR) the final rule, “Permission To Use Air Inflation of Meat Carcasses and Parts,” (FR Vol. 75, pg. 69575). The final rule and the associated revised 9 CFR 310.13 are available on the Internet at


B. The final rule amended 9 CFR 310.13(a) to provide that establishments that slaughter livestock or prepare livestock carcasses and parts that inflate carcasses or parts of carcasses with air if they develop, implement, and maintain controls to ensure that those procedures do not cause insanitary conditions or adulterate product. Under the final rule, all methods of air inflation are permitted, provided establishments develop, implement, and maintain written controls to ensure that these procedures, when applied, do not cause insanitary conditions or adulterate product. The final rule requires establishments to incorporate these controls into their Hazard Analysis and Critical Control Point (HACCP) plan or Sanitation Standard Operating Procedures (Sanitation SOPs) or other prerequisite program.
The amended regulation states:

§ 310.13 Inflating carcasses or parts thereof; transferring caul or other fat.
(a) Establishments that slaughter livestock and prepare livestock carcasses and parts may inflate carcasses or parts of carcasses with air if they develop, implement, and maintain controls to ensure that the air inflation procedure does not cause insanitary conditions or adulterate product. Establishments shall incorporate these controls into their HACCP plans or Sanitation SOPs or other prerequisite programs.
(b)(1) Transferring the caul or other fat from a fat to a lean carcass is prohibited.
(2) Injecting compressed air into the skulls of cattle in conjunction with a captive bolt stunner to hold the animal still for dressing operations is prohibited.

VI. VERIFICATION ACTIVITIES FOR THE SANITARY AIR INFLATION OF CARCASSES AND PARTS

A. If an establishment uses air to inflate carcasses or parts of carcasses, IPP are to review the establishment’s procedures and are to verify that the establishment has appropriate written controls. Once IPP determine under which program the establishment has these controls, IPP are to follow the directions in FSIS Directive 5000.1, Verifying an Establishment’s Food Safety System.

B. Additionally, IPP are to verify that the establishment has appropriate measures in place to prevent the creation of insanitary conditions. They are to directly observe the use of air inflation, review establishment records, and seek answers to questions such as:

1. Does the establishment ensure that the air is filtered to prevent contamination of carcasses or parts by such contaminants as oil, water, rust, or microbial contamination, e.g. by using a filter system that consists of not less than two stages: an initial stage of filtration at or near the use point and consisting of an aerosol or coalescing filter, capable of filtration to not more than 0.75 micron, for the removal of oil and water, and a second stage of filtration at or near the point of needle hose attachment to the air line, which filters to not more than 0.3 micron?

2. Does the establishment ensure that the air injection needle used to inflate carcasses or parts is sanitized between each carcass, e.g. by cleaning and sanitizing with 180° F water or an acceptable chemical sanitizer?

3. Has the establishment followed its specified procedures to verify effective sanitary conditions? An example of such a procedure would be if an establishment tests for contamination on the carcasses or parts or test the air, documents the results, and ensures that the test results demonstrate that the process is in compliance compared to pre-established threshold criteria.
4. Does the establishment take corrective actions when contamination from the use of air inflation equipment is found on carcasses or parts?

C. For determining noncompliance, IPP are to verify the implementation of the establishment’s procedures by following the verification methodology in FSIS Directive 5000.1 and document and cite the regulation CFR 310.13 for any noncompliances observed in accordance with the instructions in FSIS Directive 5000.1, Chapter IV, Enforcement.

VII. DATA ANALYSIS

On a biannual basis, the Data Analysis and Integration within the Office of Data Integration and Food Protection is to review PBIS or Public Health Information System data on inspection activities for potential trends in equipment noncompliances. Further, the analysis is to include Sanitation Performance Standard procedures; identify potential trends in noncompliance by activity, specifically for compliance with 9 CFR 310.13(a) and 416.3; and include a review of repetitive noncompliance within individual plants to assess the effectiveness of corrective actions. Results from these analyses are to be shared with the Office of Field Operations and the Office of Policy and Program Development; Risk, Innovations and Management Division, to determine whether the findings suggest potential improvements in equipment verification procedures or guidance to IPP.

VIII. FURTHER ACTION

If IPP have noncompliance concerns, as to whether the system is being used in an appropriate and effective manner, and whether sanitary practices are being monitored in accordance with the required procedures, they should discuss their concerns with their supervisor.

Refer questions regarding this directive to the Policy Development Division (PDD) at 1-800-233-3935 or submit your questions through ask FSIS at http://askfsis.custhelp.com.

[Signature]
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