



Within Establishment Public Health Risk-Based Inspection for Poultry Slaughter

Erin Dreyling, PhD
Isabel Arrington, PhD, DVM

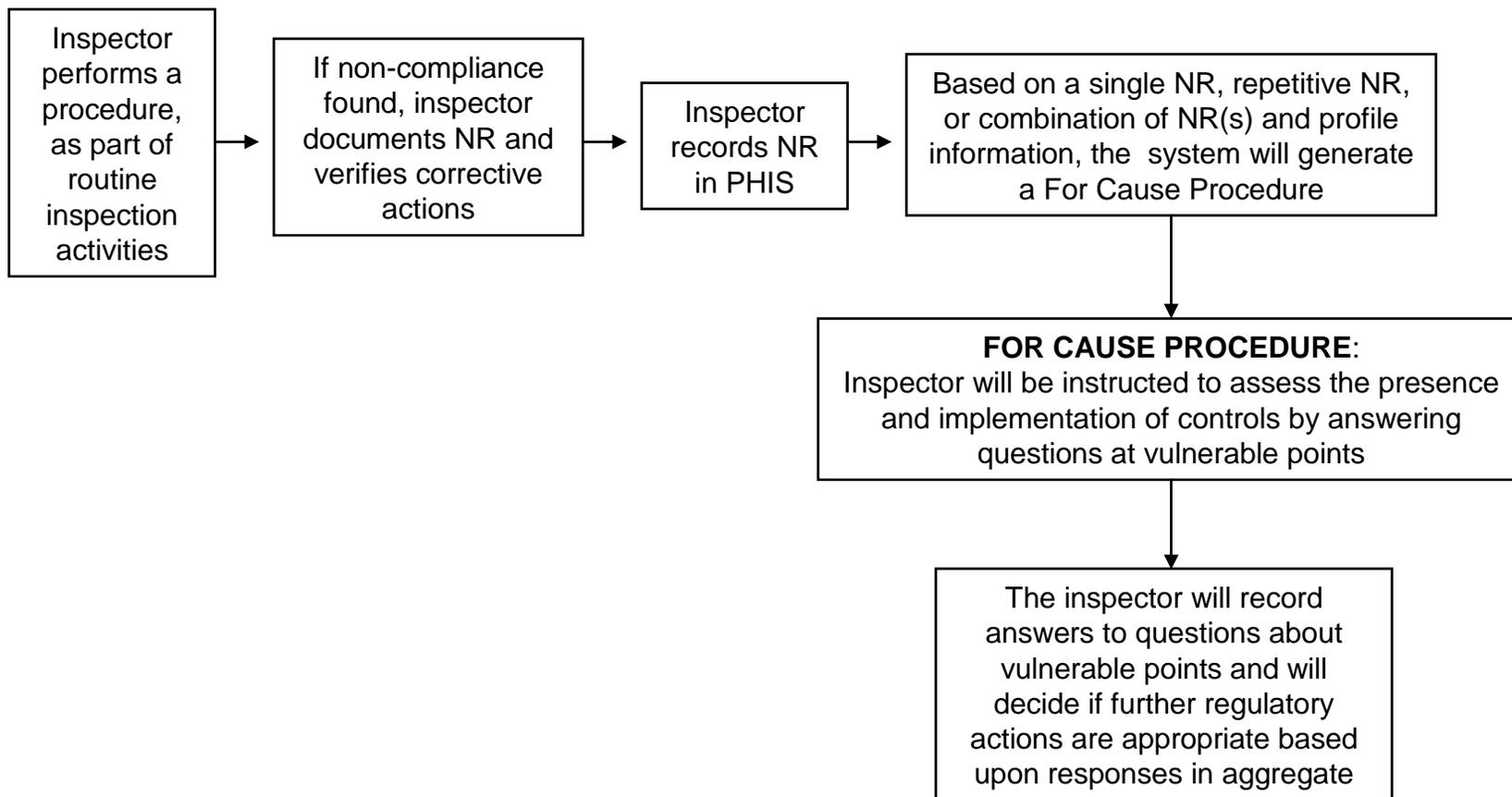
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System Overview

- Focus inspection activities on vulnerable points within an establishment
 - **Vulnerable point** - where the greatest microbial contamination or growth occurs if process control is not maintained
- Inspectors carry out existing inspection procedures (e.g., HACCP, SSOPS) and when prompted answer questions regarding vulnerable points
- Observations at vulnerable points, in aggregate, may lead to an additional NR or may provide support for an enforcement action.
- Compliance guidelines and training will be developed

Within Establishment Inspection



Directed Procedure:

Directed procedures are performed in Focused (LOI 2) and In-Depth (LOI 3) Inspection establishments



System Development

- System is based upon the scientific literature and Agency experiences with HACCP and contamination events
- Literature review was used to identify vulnerable points
- FSIS experts determined inspection prompts and vulnerable point questions



System Benefits

- Focuses on the identification of vulnerabilities within the overall food safety system
- Helps inspectors verify execution of decisions made in the hazard analysis including responding to plant data and pre-requisite programs
- Bolsters ability to link and respond to NRs and verify corrective actions are fully carried out
- Inspection results monitored automatically and alerts for anomalies built into Public Health Inspection System



Poultry Slaughter Inspection Prompt Example

Description and Threshold

- **Prompt Description:** Establishment exceeds half the standard for *Salmonella* or exceeds the standard for *Campylobacter* and Generic *E. coli*, based upon FSIS or industry data.
- **Threshold:** Single Observation during 05B02 or 03J01 procedure or sampling result from profile



Vulnerable Points

- Scalding
- Evisceration including On Line
Reprocessing
- Chilling

Scalding Questions

- Does the establishment have control mechanisms to reduce the amount of dirt and organic matter entering the chiller and are they being implemented?
- Does the establishment have controls to maintain water temperature effective to reduce micro-organisms?
- Is the establishment implementing prerequisite programs at scalding, as per their hazard analysis? Is there adequate supporting documentation?



Evisceration / On-Line Reprocessing Questions

- Does the establishment have controls to maintain equipment to accommodate changes in bird size?
- Does the establishment have controls in place to prevent cross contamination and are they implemented (ventilation, employee hygiene, equipment)?
- Does the establishment have controls in place and are they implemented to maintain parameters/conditions of use unique to its OLR system or other antimicrobial intervention to have an effective system that reduces micro-organisms?

Chilling Questions

- **For all chillers:**
 - **Does the establishment have controls and are they being implemented to maintain an effective level of antimicrobial?**
 - **Does the establishment have controls and are they being implemented to maintain effective chiller temperature?**
 - **Does the establishment have controls to maintain a high flow rate (a half a gallon per bird) or alternate method?**
 - **Is establishment implementing prerequisite programs at chilling, as per their hazard analysis? Is there adequate supporting documentation?**



Potential Regulatory Citations

- 9 CFR 416.1 Failure to maintain sanitary conditions
- 9 CFR 417.5 (a) (1)&(2) decisions in hazard analysis not supported
- 9 CFR 416.1 Sanitary Dressing
- 9 CFR 416.13 Failure of implementation and monitoring of SSOP



Case Study:
Food borne Illness Linked to
Poultry Slaughter



Case Study: Problems

- 1. Problems with Hazard Analysis decisions and support**
 - Had testing information that *Salmonella* was a hazard in the establishment, but did not identify as hazard likely to occur
 - Interventions in chiller and final wash not identified in HA; no validation; conditions of use not specified
 - No control measures to address *Salmonella*, instead only addressed visible fecal material---inadequate in their process
 - Water reuse in chiller and from final wash to scalding not addressed: water reuse could be a multiplying source of *Salmonella*
 - Did not adjust equipment properly for changing bird size; excessive fecal contamination observed due to equipment; did not respond to own checks on crop breakage (checks failed their standard—no action)
- 2. Corrective Actions not effective, repetitive NRs**
 - NRs on Critical Limit deviation for required chilling temperature—may allowed growth of *Salmonella*
- 3. Not responding to in-plant data**
 - Est. had 2 years of data on *Salmonella* showing it was failing standard and presence of serotype known to cause human illness



Case Study: Solutions

1. Focuses on the identification of vulnerabilities within the overall food safety system
2. Help inspection to verify execution of decisions made in the hazard analysis, including responding to plant data and pre-requisite programs
3. Bolsters inspection to link and respond to NRs and verify corrective actions are fully carried out; additional information from plant profile sends alerts as events occur
4. Automated monitoring of inspection results and built-in alerts of anomalies, including a lack of inspection activity