Modernization of Poultry Slaughter Inspection (NPIS)

• On January 27, 2012, FSIS published a proposed rule, “Modernization of Poultry Slaughter Inspection” (77 FR 4408)
• The Agency proposed a new inspection system for young chicken and turkey slaughter establishments that would replace all of the existing inspection systems except for traditional inspection

Elements of NPIS

• Requires that plant personnel sort carcasses and remove unacceptable carcasses and parts before the birds are presented to the FSIS carcass inspector
• Reduces the number of on-line carcass inspectors to one
• Permits faster line speeds than existing inspection systems

Questions About the NPIS

• Question: Why does FSIS believe that it is preferable for plant employees to sort carcasses?
• FSIS response: Under existing inspection, on-line inspectors conduct activities that do not have a direct impact on public health. With NPIS, the only birds presented to the carcass inspector (CI) would be those that are likely to pass inspection. The CI will be able to focus on food safety-related activities, such as verifying that carcasses affected by septicemia or toxemia or contaminated with visible fecal material do not enter the chiller.

Questions About the NPIS

• Question: Is there any guarantee that FSIS inspectors would be performing more food safety-related activities?
• FSIS response: Yes, because the on-line CI would not be responsible for sorting carcasses for quality-related defects, the amount of time that the CI spends focusing on food safety-related activities would increase. The offline verification inspector (VI) would conduct food safety-related activities, such as verifying compliance with HACCP and sanitation SOP requirements and collecting product samples.
Questions About the NPIS

• Question: What would establishment employees be required to do as part of their sorting activities?
  
  FSIS response: Plant sorters (plant employees) would be required to identify carcasses with sep/tox and other condemnable conditions and to remove them from the line before they reach the CI. Establishment employees would also need to conduct trimming and reprocessing before the birds reach the CI.

Questions About the NPIS

• Question: Where would the establishment’s CCP for visible fecal contamination be located?
  
  FSIS response: FSIS does not prescribe this. The USDA-CI would be located before the chiller. Visible fecal contamination would need to be removed before the carcass is presented to the CI. The Verification Inspector (VI) would be conducting verification checks for fecal contamination offline. If the VI detects fecal contamination offline, the plant has exceeded the zero tolerance for visible fecal contamination.

Questions About the NPIS

• Question: If the final rule becomes effective, would plants be able to start running at the faster line speeds right away or would there be a gradual increase in line speeds?
  
  FSIS response: To operate at faster line speeds, plants would need to comply with all of the requirements in any final rule that results from this rulemaking. The plant’s maximum line speed would depend on the ability of the plant to maintain process control, and whether conditions are affecting the ability of the CI to properly inspect.

Questions About the NPIS

• Question: Would the plant’s procedures to prevent contamination with enteric pathogens and fecal material have to be approved?
  
  FSIS response: There would be no pre-approval of a plant’s procedures. Plants must verify efficacy by showing FSIS:
  - Micro testing pre-chill and post-chill
  - Absence of visible fecal contamination,
  - Acceptable FSIS sampling results for Salmonella and Campylobacter

Source: FSIS.USDA.GOV
Conclusions about NPIS

• NPIS is a significant move forward for the poultry industry
• The responsibility for food safety should rest on the shoulders of the companies that produce the food
• This was the ultimate goal of HACCP
  Under HACCP, plant employees:
  – Identify the hazards
  – Control the hazards
  – Record deviations and corrections
  – Verify that it is working
• Regulatory decisions may be made with political considerations in mind right now
  – Which consumer group is reacting right now?
• Inequity in the way inspectors apply regulations
• Under this system, food safety is the concern, not politics

How are we doing?

• Some companies are finding that they can meet the Salmonella standard (< 7.5% positive), but are having difficulty meeting the Campylobacter standard of < 10.4% positive
No Field Intervention

- We have no field intervention for *Campylobacter* as we do with *Salmonella*
- Competitive exclusion
- Vaccines
- Prebiotics
- No effect

How can we lower the *Campylobacter* load at rehang?

- Pre-scald Bird Brushes
  - Lowered feces in scald from 1.5 ft to 2 inches
  - May not lower prevalence
  - May dramatically lower numbers
  - Lowers organic loading in the scald
  - Reduces spreading of feces during picking

Hypothetical *Campylobacter* and *Salmonella* Counts on Carcasses During Processing

![Graph showing hypothetical campylobacter and salmonella counts on carcasses during processing.](image)

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Pre-scald Bird Brushes help to avoid this
Conclusions

• Innovative approaches to *Campylobacter* control should be sought
• The USDA-FSIS’s proposals to lower the performance standard for *Campylobacter* may not be achievable with current technology
• *Campylobacter* is seasonal and regional
• Why penalize companies because of their location and weather conditions?