

Broiler Processing Food Safety Regulatory Update




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Elements of NPIS

- Replaces the existing Finished Product Standards (FPS) with a requirement to maintain records to document that the products resulting from their slaughter operations meet the definition of ready-to-cook poultry
- Requires plants to implement and maintain written procedures to prevent contamination of carcasses and parts by enteric pathogens and fecal material, and that they incorporate these procedures into their HACCP plan or sanitation standard operating procedures (SOP) or other prerequisite programs

CORRECTIVE ACTION LOG						
Date	Product	Problem	Root Cause	Preventive Action	Responsible	Status


Hazard Analysis				
Control Point	Control Measure	Control Method	Control Frequency	Control Location

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

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.



Source: FSIS.USDA.GOV


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:** 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.



Source: FSIS.USDA.GOV

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**.



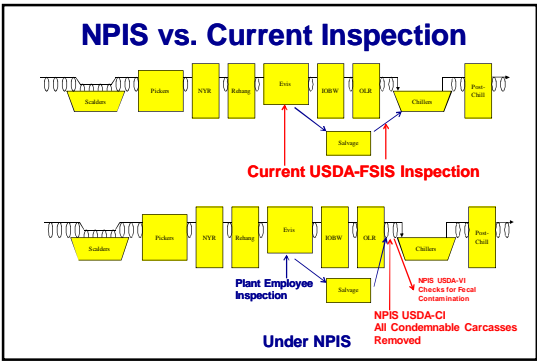
Source: FSIS.USDA.GOV

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



Questions About the NPIS


- Question:** Can FSIS clarify how visible fecal contamination would be handled under the new poultry inspection system?
- FSIS response:** All plants must develop procedures to **prevent fecal contamination** and contamination by enteric pathogens **throughout the entire process** and not just cleaning up the birds at the end of the process. These written procedures would need to be incorporated into the HACCP system.



Source: FSIS.USDA.GOV

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 off-line**. If the VI detects fecal contamination off-line, the plant has exceeded the zero tolerance for visible fecal contamination.



Source: FSIS.USDA.GOV

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.



Source: FSIS.USDA.GOV

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USDA's Poultry Proposal Endangers Eaters, Not Just Employees
BY SARAH KLEIN | MAY 21, 2013

OPINION

Ever hear the one about how the well-dressed accomplice caused a scene at the front door of the bank, while the masked robbers snuck in through the back and made off with the loot? Let that be a lesson to us: when we all train our eyes in one direction, we may miss the real danger lurking behind.



As USDA appears to be ramping up a pre-release publicity campaign on the new poultry inspection system, the agency is

The Obama Administration's idea of "modernizing" poultry inspection is to permit each regulated company to decide what it wants to test for and how frequently. If you liked the results of letting banks regulate themselves, you may like the results of having big poultry companies controlling efforts to prevent contamination of meat and poultry. The tests and results would vary by company, making meaningful comparison impossible and limiting USDA's ability to assess its program's effectiveness or conduct strategic planning and reduce threats.

When will it be established?

- During a House appropriations hearing April 16, Agriculture Secretary Tom Vilsack said he expected the agency to take action to publish the final rule on modernizing poultry inspection procedures "very soon." However, a spokesperson told Feedstuffs that after two months USDA is still in the process of determining the final rule, and has not even sent it to the Office of Management and Budget for final review.
- In its consideration of the 2014 Agriculture and Rural Development Appropriations Bill June 13, the full House Appropriations Committee adopted an amendment by voice vote **urging the U.S. Department of Agriculture to move forward on its proposed rule to modernize poultry inspection.**

USDA personnel oppose New Poultry Inspection System

BROILERS PROCESSING 472 x 0

Early in 2012 the USDA- Food Safety and Inspection Service (FSIS) issued a Proposed Rule for the New Poultry Inspection System (NPIS). This modernisation of inspection in turkey and broiler plants is intended to place greater emphasis on reducing pathogens and intensifying internal company surveillance allowing FSIS On-Line Inspectors to be more flexible with regard to oversight of quality.

It is inevitable that the NPIS will be introduced despite objections from the Inspectors' Union. Opposition is based on the desire for job preservation and a disinclination to change the traditional but obsolete approach to product safety.

Campylobacter Regulation

- Enacted July 30, 2011

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE	31-11	6/30/11
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NEW PERFORMANCE STANDARDS FOR SALMONELLA AND CAMPYLOBACTER IN CHILLED CARCASSES AT YOUNG CHICKEN AND TURKEY SLAUGHTER ESTABLISHMENTS

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

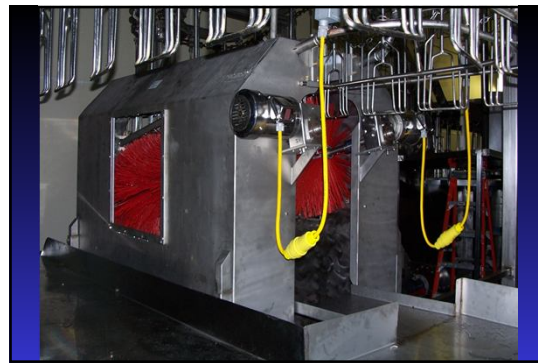
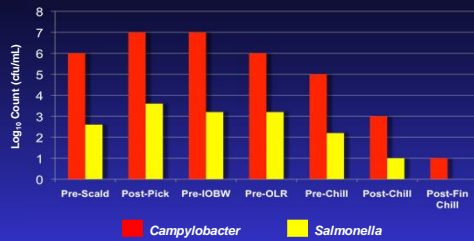


How can we lower the *Campylobacter* load at rehang?

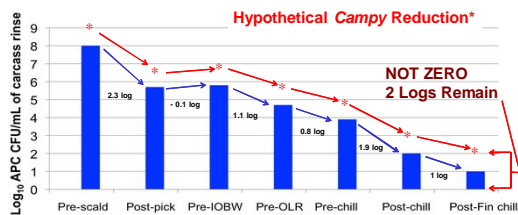
- **Pre-scald Bird Brushes**
 - Lowered feces in scalders from 1.5 ft to 2 inches
 - May not lower prevalence
 - May dramatically lower numbers
 - Lowers organic loading in the scalders
 - Reduces spreading of feces during picking



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



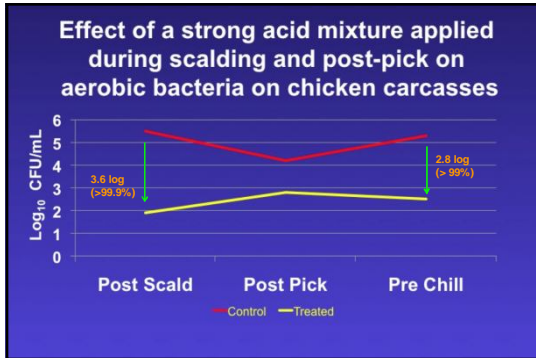
Actual Log₁₀ Aerobic Plate Count (APC) CFU/mL of rinse on broiler carcasses during processing



*This is a very well-run plant using multiple interventions. If these were Campy numbers, the carcasses would remain positive

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?