

## FSIS Requirements Prohibiting Use of Specified Risk Materials (SRMs) for Human Food

Because Bovine Spongiform Encephalopathy (BSE) was confirmed in a cow in the United States on December 25, 2003, the Food Safety and Inspection Service (FSIS) developed an emergency interim final rule to ensure that “specified risk materials (SRMs)” from cattle 30 months of age or older and certain SRMs in all cattle do not enter the food supply.

<b>Previous Requirements Before Jan 12, 2004</b>	<b>Current Requirements Beginning Jan 12, 2004</b>
<ul style="list-style-type: none"> <li>• No designation of “specified risk materials.”</li> <li>• Most materials could be used in some way in food.</li> <li>• Exceptions: Tonsils and distal ileum were prohibited from food products.</li> <li>• Detached spinal cords could not be used in edible products, but could be used in edible rendering.</li> </ul>	<p>In all cattle, “specified risk materials” (SRMs) are:</p> <ul style="list-style-type: none"> <li>• Distal ileum of the small intestine (but to ensure complete removal, FSIS requires entire small intestine to be removed)</li> <li>• Tonsils</li> </ul> <p>In cattle 30 months of age or older, additional “specified risk materials” (SRMs) are prohibited from use in human food. They are:</p> <ul style="list-style-type: none"> <li>• Brain</li> <li>• Skull</li> <li>• Eyes</li> <li>• Trigeminal ganglia</li> <li>• Spinal cord</li> <li>• Vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum)</li> <li>• Dorsal root ganglia (DRG).</li> </ul> <p>(Interim final rule and request for comments was published January 12, 2004.)</p>
<p><b>Plant Responsibilities:</b></p> <p>Meet all regulatory requirements, including:</p> <ul style="list-style-type: none"> <li>• Development and implementation of Hazard Analysis and Critical Control</li> </ul>	<p><b>Plant Responsibilities—Plants which slaughter or process cattle must:</b></p> <p>Meet all regulatory requirements, including:</p> <ul style="list-style-type: none"> <li>• Development and implementation of</li> </ul>

<p>Points (HACCP) Plan and Sanitation Standard Operating Procedures (SOPs).</p>	<p>Hazard Analysis and Critical Control Points (HACCP) Plan and Sanitation Standard Operating Procedures (SOPs) for slaughter.</p> <ul style="list-style-type: none"> <li>• Implement and maintain written procedures for removal, segregation, and disposition of SRMs.</li> <li>• Incorporate these procedures into HACCP plans, Sanitation SOPs or other prerequisite programs.</li> <li>• Have corrective action provisions.</li> <li>• Ensure that SRMs are completely removed from carcass, segregated from edible products, and appropriately disposed of.</li> <li>• Maintain daily records to document implementation and monitoring of procedures for the removal, segregation, and disposition of SRMs.</li> <li>• Make those records available to FSIS personnel upon request.</li> </ul> <p>(Interim final rule and request for comments was published January 12, 2004.)</p>
<p><b>FSIS Responsibilities:</b></p> <ul style="list-style-type: none"> <li>• Normal inspection verification procedures for HACCP, Sanitation SOPs, and post-mortem inspection.</li> <li>• Verifying corrective actions.</li> </ul>	<p><b>FSIS Responsibilities:</b></p> <p><b>In addition to normal inspection procedures:</b></p> <ul style="list-style-type: none"> <li>• Ensure the adequacy and effectiveness of a plant's procedures.</li> <li>• Verify age of cattle by using a combination of procedures:</li> <li>• Examine records that document age of cattle slaughtered in the plant.</li> <li>• Determine if at least one of the permanent incisors has erupted (which occurs at 24-30 months of age).</li> <li>• In plants which only process carcasses and parts, verify age through plant records.</li> <li>• If plant does not have the records, instruct it to handle all carcasses and parts as if from cattle 30 months of</li> </ul>

age and older.

- (Interim final rule and request for comments was published January 12, 2004.)
- FSIS will develop compliance guidelines for small and very small plants to assist them in developing validated methods for meeting SRM requirements.