

Scenario Two: Inspection Personnel at Processing Establishment

Use the following scenario to learn about the verification procedures that inspection personnel should follow at processing establishments.

You are the inspector-in-charge at the ABC Company, a large volume sausage processing operation. You have received word that the operation may begin using beef small intestines. You are planning to discuss this with the establishment's management at the weekly meeting held on Monday morning.

Question: What information should you seek from the establishment's management?

Answer: Determine whether the establishment intends to use beef small intestines, excluding the distal ileum:

- In a meat food product or for edible rendering, or
- As a beef casing such as a meat sausage casing.

Question: What will you do if they do not plan to use beef small intestines in a meat food product, for edible rendering, or as a casing?

Answer: If the establishment will not be using the small intestine, excluding the distal ileum, in the above listed products the inspector-in-charge should document the decision in a memorandum of interview.

Question: What topics would you discuss with the establishment's management if they do plan to use beef small intestines in a meat food product, for edible rendering, or as a casing?

Answer:

- Discuss how the establishment will ensure that beef small intestines for use in a meat food product or for edible rendering comply with 9 CFR 310.22(d).
- Discuss how the establishment will ensure that natural beef casings for use as containers of a meat food product were derived from small intestines that comply with 9 CFR 310.22(d)(ii) as demonstrated through documentation.
- Inform the establishment that it will need to reassess its food safety system. The reassessment is necessary because the use of beef small intestines or casings derived from beef small intestines represents a change in raw materials that could affect the hazard analysis or alter the HACCP plan.

Question: How will you document the meeting?

Answer: In a memorandum of interview, the inspector-in-charge should document who was present at the awareness meeting, the date and time of the meeting, what was discussed, and any documents that were shared with the establishment's management. Inspection program personnel must maintain a copy of the memorandum in the official government file and provide a copy to the establishment's management.

The establishment plans to produce sausage in a casing derived from beef small intestine, except the distal ileum. The establishment has reassessed its food safety system.

Question: What will you need to verify once the establishment has reassessed its food safety system?

Answer: You will need to verify that the establishment can demonstrate, through documentation, that the small intestines comply with 9 CFR 310.22(d), and verify into which food safety system the establishment incorporated any procedures adopted as a result of its reassessment. Verify that the establishment has appropriately addressed in its food safety system the use of small intestines, excluding the distal ileum, in a meat food product or for edible rendering, and the use of natural casings derived from beef small intestines.

As part of the documentation, all imported natural beef casings that enter an FSIS-regulated establishment to be used in the preparation of a meat food product must be accompanied by an Official Meat Inspection Certificate for Fresh Meat and Meat Byproducts as found in 9 CFR 327.4(a), which attests that the product is in compliance with the FMIA and said regulations.

The establishment has developed and implemented a prerequisite program for providing documentation from the casing supplier that the casings were derived from intestines that met the requirements of 9 CFR 310.22(d).

Question: How will you verify that the plant has effectively implemented its food safety system?

Answer: You will verify the establishment's execution of its food safety system procedures to ensure that the small intestines comply with 9 CFR 310.22(d) by following the directions in FSIS Directive 5000.1. The distal ileum has no curve and an irregular thick surface.

CONGRATULATIONS!

You have completed the processing establishment scenario.