

Scenario One: Inspection Personnel at Beef Slaughter Establishment

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

You are the inspector-in-charge at XYZ Packing Company, a large beef slaughter establishment. You have heard that the establishment management wants to begin harvesting beef small intestine for edible products and they plan to bring it up at the next weekly meeting. If that occurs, you want to be prepared.

Question: What information should you gather first when you meet with the establishment management?

Answer: You should determine if the establishment will be saving beef small intestines, except the distal ileum, for human food. If the plant will not be saving intestines, document this in the memorandum of interview.

Question: What will you discuss if they tell you they plan to save small intestines for human food?

Answer:

- The regulations 9 CFR 310.22(d) permits, under certain circumstances, beef small intestines, excluding the distal ileum, to be used for human food.
- The procedures that the establishment will use to detach the distal ileum from the intestines.
- The procedures that the establishment will use to ensure appropriate segregation and disposal of the distal ileum of the small intestines of all cattle.
- The guidelines indicating that the establishment will need to reassess its food safety system as set out in 9 CFR 417.4(a)(3).

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 has reassessed its food safety system to consider saving small intestines for human food.

Question: Why did the establishment reassess its food safety system?

Answer: The reassessment is necessary because the removal of the distal ileum from the small intestines represents a change in the establishment's slaughter or processing methods that could affect the hazard analysis or alter the HACCP plan.

Removal of only the distal ileum instead of the entire small intestine is also a change that affects the establishment's procedures for the removal, segregation, and disposal of specified risk materials (see 9 CFR 310.22(e)(3)). Any change to these procedures would need to be properly incorporated into the establishment's food safety system (see 9 CFR 310.22(e)(1)).

Question: What will you need to verify after the reassessment?

Answer: After the establishment has performed its reassessment, public health veterinarians (PHVs) must:

- Verify into which program (e.g., HACCP plan, SSOPs, or prerequisite program) the establishment incorporated any procedures adopted as a result of its reassessment.
- Verify that the establishment has appropriately addressed in its food safety system design the effective removal of the distal ileum from the small intestines by verifying the establishment has procedures that:
 - Ensure removal of 80 inches of uncoiled and trimmed small intestines as measured from the ceco-colic junction and progressing proximally towards the jejunum, or
 - Are effective in ensuring complete removal of the distal ileum.

For technical questions regarding procedures, PHVs should contact the Policy Development Division, OPPD (formerly the Technical Services Center).

The establishment implements its revised food safety system and begins saving beef intestines, except the distal ileum, for human food.

Question: How will offline inspection personnel verify the effective implementation of the food safety system?

Answer: You will follow the methodology as given in FSIS Directive 5000.1, which may include any of the following activities carried out while performing HACCP and SSOP procedures:

- Review the HACCP plan.
- Review HACCP records.
- Review the SSOP and/or prerequisite programs.
- Review SSOP and/or prerequisite program records.
- Directly observe the establishment removing the distal ileum.

For example, as part of verifying establishment monitoring or verification procedures, inspection program personnel may perform a direct observation of the establishment removing the distal ileum. Inspection program personnel may use the ileo-cecal-colic juncture as a verifiable point of reference. In addition, the distal ileum has no curve and an irregular thick surface.

CONGRATULATIONS!

You have completed the beef slaughter establishment scenario.