

VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS
FOOD SAFETY CONSUMER PROTECTION DIVISION
MONTPELIER, VT
Chuck Ross, Secretary



MIS NOTICE

Adopted from FSIS Notice 10-16

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03/1/16

INSPECTION RESPONSIBILITIES AND AUTHORITIES FOR REDUCING EVISCERATION LINE SPEED

I. PURPOSE

A. This notice reissues instructions previously issued in VT Notice 06-15, *Inspection Responsibilities and Authorities for Reducing Slaughter or Evisceration Line Speed*.

B. This notice instructs Inspectors-in-Charge (IICs) and off-line and on-line Inspection Program Personnel (IPP) on their responsibilities and authorities relating to assessing and reducing slaughter or evisceration line speed in poultry and livestock establishments.

II. BACKGROUND

The Poultry Products Inspection Act (PPIA), the Federal Meat Inspection Act (FMIA) and the Vermont Statutes Annotated (V.S.A) provide that there is to be an inspection to assess whether carcasses are not adulterated and can be passed for human consumption. 21 U.S.C. 455, 21 U.S.C. 604 and 6 V.S.A. Chapter 204 §3304.

III. IIC AUTHORITIES AND RESPONSIBILITIES

A. IICs are to ensure that IPP can perform a post-mortem inspection of poultry and livestock carcasses at all times.

B. IICs are to slow maximum allowed line speeds when the prescribed inspection procedure cannot be performed because of the size or weight of the animals or birds, or because of inconsistencies in the size, weight, or class of animals or birds or in the health, pathology, contamination or presentation of the animals or birds (9 CFR 381.65(a), 381.67, 381.68, 381.76 and 310.1(b) (1)).

C. IICs assigned to poultry slaughter establishments are to:

1. Perform or assign presentation checks using appropriate presentation forms or otherwise assess presentation and evaluate the health status of the flock as often as necessary. IICs are to assess these factors to determine whether any of them is having an impact on the ability of IPP to perform the proper inspection procedures at a given line speed ([FSIS PHIS Directive 6100.3](#) *Ante-mortem and Post-mortem Poultry Inspection*);

2. Reduce line speeds to a speed at which IPP can perform the proper inspection procedures;
3. Measure the maximum allowed line speed using physical methods. The maximum allowed line speed is a whole number. Any line speed measurement resulting in a fraction is to be rounded up to the next highest whole number;
4. Reduce line speed when there is evidence that increased carcass contamination interferes with the ability of the on-line inspector to conduct post-mortem inspection ([FSIS Directive 6410.3](#));
5. Assess as quickly as possible the presentation and health status of the flock when on-line IPP report potential problems with presentation or an increase in carcass contamination rate or the pathology of the birds;
6. Determine whether online carcass inspectors assigned to young chicken establishments can perform proper inspection in the time available when inspectors report that they are routinely using two hands to reflect the fat flaps or are having difficulty in observing the inside cavity.

NOTE: The inspection procedure for automated equipment systems (e.g., Meyn, NuOva, and Linco) is observing the viscera and using two hands to reflect fat flaps. Therefore using two hands to reflect the flaps does not necessarily mean inspectors are having difficulty observing the cavity. However, that does not mean that line speed cannot be reduced in establishments using automated equipment if inspectors need more time for proper inspection. Using both hands to reflect the fat flaps of birds slaughtered in New Line Speed Inspection System (NELS) and Streamlined Inspection System (SIS) establishments is a stronger indication of difficulty in observing the inside cavity since proper inspection requires one hand to reflect the flap, and one hand to manipulate the viscera. The post-mortem inspection procedures for New Poultry Inspection System (NPIS) rely heavily on observation with occasional carcass manipulation.

- a. Online inspectors need additional time to properly conduct the inspection procedures when establishments do not maintain optimal conditions for efficient inspection. These less than optimal conditions include heavy young chicken carcasses with ample fat deposits under the abdominal flaps or with presentation errors, such as inadequate opening cuts or parts left inside the body cavity. Line speed reductions are to be based on whether online inspectors have the amount of time they need to adequately perform inspection procedures, which is affected by the following factors:
 - i. Carcass size – Inspectors may require additional time for inspection of heavy young chicken carcasses (average weight over 6 pounds) because such carcasses may have more fat on the abdominal flaps than smaller carcasses, which could obstruct the inspectors' vision into the abdominal cavity, or because the increased size of these birds may mean that more time is needed to view their carcasses than those of smaller carcasses.

- 1) IICs are to use the instructions in [FSIS PHIS Directive 6100.3](#), Section XI.B to determine whether to classify young chickens as heavy.
 - 2) IICs are not to automatically reduce line speeds based only on bird weight or size unless there is a documented history of numerous and repetitive line speed reductions of this issue on MOIs (see 7.b. below).
 - 3) IICs are to assess whether inspectors can adequately inspect the birds at the line speed that the establishment seeks to employ and to reduce the line speed in accordance with presentation rules for the applicable inspection system until an appropriate speed is reached:
 - a) For SIS-based systems (35 birds per minute [BPM] per inspector), the IIC is to reduce the line speed by 10% each time until inspection can be adequately performed within the time available.
 - b) For NELS-based systems (31 1/3 BPM per inspector), the IIC is to reduce the line speed by 10 BPM each time until inspection can be adequately performed within the time available.
 - 4) IICs are to increase the line speed in the same manner as reduced once conditions have improved.
 - a) For SIS-based systems (35 birds per minute [BPM] per inspector) the IIC is to increase the line speed by 10% each time until the regulatory line speed is reached or inspection can be adequately performed within the time available.
 - b) For NELS-based systems (31 1/3 BPM per inspector) the IIC is to increase the line speed by 10 BPM each time until the regulatory line speed is reached or inspection can be adequately performed within the time available.
- ii. Opening cuts – For efficient inspection, carcasses should be adequately opened to readily reveal the inner carcass surfaces when inspectors reflect the abdominal flaps. If evisceration equipment is not designed for larger carcasses, i.e., the shackle distance is too small for bird size; inadequate opening cuts may hinder efficient inspection.
 - iii. Amount of fat deposited on the flaps – Inspectors may need more time to inspect heavy young chickens when it is more difficult to manipulate flaps because of fat deposits and thus more difficult to observe the inner carcass surfaces. If IICs evaluate the situation and find that online inspectors are routinely using two hands to reflect fat flaps and thus having difficulty

observing the inside cavity, the line speed is to be reduced to a speed at which IPP can inspect properly.

- iv. Light quality at the inspection station – The ability to visualize carcass interior surfaces depends on the quality of lighting and positioning of lighting to allow for optimum conditions. Although establishments may meet regulatory lighting requirements (9 CFR 381.36, minimum of 200-footcandles of shadow-free lighting with a color rendering index of 85), optimum positioning of the light to visualize inside the carcass becomes more critical when operating at high line speeds.

7. Document the reduction of line speed

- a. On a non-compliance record (NR) when the maximum allowed line speed is exceeded, or when the allowable number of presentation errors that call for an immediate reduction in line speed is reached. In the NR the IIC is to describe findings that support the reduction in line speed and cite the appropriate regulations (9 CFR 381.76, 381.67, 381.68, and 381.65) using the PHIS Other Inspection Requirements task;
- b. On an MOI when other conditions, such as bird size, require a reduction in line speed. In the MOI the IIC is to describe findings that support the reduction in line speed and the line speed reduction required to allow inspection to be adequately performed within the time available. The IIC is to provide a copy to the establishment and inform its management that if a history of multiple and repetitive MOIs on this issue develops, then the line speed will automatically be reduced to that documented for young chickens of the same or similar size.

D. IICs assigned to livestock slaughter establishments are to:

1. Perform or assign verifications to determine when the inspection procedures cannot be adequately performed at the existing line speed because of particular deficiencies in carcass preparation or presentation by the establishment, or because the health condition of the animals indicates a need for a more extensive inspection (9 CFR 310.1(b)(1)). IICs are to reduce the line speed to one at which IPP can perform the proper post-mortem inspection procedures;
2. In conjunction with specific verifications of slaughter line speed process control, perform or assign verification activities to determine whether the establishment's slaughter and sanitary dressing procedures are controlling contamination that may affect IPP's ability to perform proper post-mortem inspection procedures ([FSIS PHIS Directive 6410.1](#), *Verifying Sanitary Dressing and Process Control Procedures in Slaughter Operations of Cattle of Any Age*);
3. Use the PHIS Other Inspection Requirements task to document noncompliance only when the maximum allowed line speed has been exceeded, or when particular deficiencies in carcass preparation or presentation have resulted in the IIC slowing the line speed. In the NR, the IIC is to describe findings that support the reduction in line speed, citing 9 CFR 310.1(b)(1);
4. Measure the maximum allowed line speed using physical methods. The maximum allowed line speed is a whole number. Any line speed measurement resulting in a fraction is to be rounded up to the next highest whole number; and

5. Assess as quickly as possible in conjunction with sanitary dressing verifications, as appropriate, presentation and health status of the lot when on-line IPP report potential problems with presentation, sanitary dressing, contamination, pathology, or health status of the animals.

E. The IIC is responsible for ensuring a safe work environment for IPP. If in performing their inspection duties IPP recognize or brought to their attention an occupational safety and health (OSH) hazard that would affect them or their VAAFM colleagues, they are to report the hazard to their immediate supervisor.

Workers can communicate a serious OSH hazard, emergency, fatality, or imminent life threatening situation directly to VOSHA by calling VOSHA's toll-free telephone number: 1-800-287-2765. For non-serious OSH hazards, please use the on-line reporting form: <http://labor.vermont.gov/vosha/safety-complaints/>.

NOTE: If an imminent danger (e.g. fire, gas explosion, natural gas leaks, broken ammonia line) is found or reported, the IIC is to remove VAAFM employees from the workplace.

F. IICs are responsible for ensuring that each on-line inspector is aware of his or her authority as described below. The IIC also is to regularly correlate appropriate Agency standards and monitor performance for each inspector to ensure uniformity of inspection procedures and actions.

IV. ON-LINE IPP AUTHORITIES AND RESPONSIBILITIES

Note: VT Food Safety Specialists function as an IIC and as on-line inspection staff

A. On-line inspectors do not have the authority to slow line speeds.

B. In order to ensure their safety and health, on-line inspectors are to stop the line for hazards needing immediate intervention. Such hazards include, but are not limited to, preventing injury because of a malfunction of automated shackles, saws, or other equipment or because of accidental splashing of bile or fluid in the eyes. On-line inspectors are to stop the line if establishment employees report that an imminent danger is present.

C. On-line inspectors assigned to a poultry slaughter establishment are to:

1. Detect trends of increasing contamination, pathology, disease, or improper presentation;
2. Stop the line at times needing immediate intervention to prevent the production of adulterated or unwholesome product. For example:
 - a. If numerous birds in a row are presented with excessive contamination or disease conditions or improper presentation at the inspection station, then IPP are to stop the line until the immediate situation is corrected. IPP are to approve the establishment's restarting the line.
 - b. If the occurrence of such affected birds is occasional, the on-line inspector is to direct the establishment helper to "hang back" the carcass without stopping the line.
3. Stop the line when the inspectors' ability to conduct a complete post-mortem inspection is being impeded by the establishment helper or other personnel.
4. Stop the line in young chicken establishments if they believe the chickens are heavy young chickens (exceeding 6 pounds at transfer station), and they believe that inspection cannot

be adequately performed within the time available because they are routinely using both hands to reflect the fat flaps of birds and thus having difficulty observing the inside cavity.

D. On-line inspectors assigned to a livestock slaughter establishment are to:

1. Detect trends of increasing contamination, pathology, disease, or improper presentation.
2. Stop the line according to:
 - a. [FSIS PHIS Directive 6420.2](#), *Verification of Procedures for Control of Fecal Material, Ingesta and Milk in Slaughter Operations*; and
 - b. [FSIS PHIS Directive 6100.2](#), *Post-mortem Livestock Inspection*

NOTE: In livestock operations there may be a rail out system that may reduce the need to stop the line.

3. Stop the line at times when the inspector's ability to conduct a complete post-mortem inspection is being impeded by the establishment helper or other establishment personnel. IPP are to approve the establishment's restarting the line.

V. QUESTIONS

Refer questions regarding this notice to the Vermont Meat Inspection Section at 802-828-2426.

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