

VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS  
CONSUMER PROTECTION AND FOOD SAFETY  
Meat Inspection Service  
MONTPELIER, VT  
Anson Tebbetts, Secretary



# MIS DIRECTIVE

Adopted from FSIS Directive 6030.1

Rev. 2

6030.1 Rev 2

12/28/2021

## RELIGIOUS EXEMPTION FOR THE SLAUGHTER AND PROCESSING OF POULTRY

### I. PURPOSE

This directive provides instructions to inspection program personnel (IPP) for verifying the applicable regulatory requirements in official poultry establishments operating under approved religious exemptions for the slaughter and processing of poultry. This directive clarifies the parameters needed for approval and IPP verification of poultry religious exemptions.

#### KEY POINTS:

- *Religious exempt establishments conduct microbial sampling to monitor their ability to maintain process control as required in [9 CFR 381.65\(g\)](#)*
- *Ante-mortem and post-mortem inspections are conducted as per the Poultry Products Inspection Act ([PPIA](#))*
- *Viscera and other parts may be processed under an approved religious exemption and labeled as religious exempt*
- *Religious Exemption information is in the Public Health Information System (PHIS) Establishment Profile*

### II. CANCELLATION

FSIS Directive 6030.1, Rev. 1, *Religious Exemption for the Slaughter and Processing of Poultry*, 8/10/05 and FSIS Form 6030-1 Exemption Certificate (Poultry) 7/13/05

### III. BACKGROUND

A. The [PPIA \(21 U.S.C. 464\(a\)\(3\)\)](#) exempts from certain requirements official establishments slaughtering or processing poultry or poultry products in accordance with religious dietary laws. The religious exemption is intended to prevent conflicts between religious dietary laws and regulatory requirements. Any official establishment that slaughters or processes poultry or poultry products that are produced or processed as required by recognized religious dietary laws may apply for exemption from specific provisions of the Act and regulations. VAAFM approves exemptions to the extent necessary to avoid a

conflict, as outlined in the poultry inspection regulations ([9 CFR 381.11](#), [9 CFR 381.12](#), and [9 CFR 381.14](#)).

B. An establishment may apply for an exemption to slaughter or process poultry products according to recognized religious dietary laws. As examples, the following have been previously approved exemptions under the provisions of the [PPIA](#):

1. Processing in accordance with Buddhist religious beliefs that require the poultry to be eviscerated, with head and feet intact;
2. Processing in accordance with Confucian religious beliefs that require the poultry to be noneviscerated, with head and feet intact;
3. Processing in accordance with Islamic (or Halal) religious beliefs that require the poultry to be eviscerated, head intact, with or without the feet intact; and
4. Processing in accordance with Judaic (or Kosher) religious beliefs that require the poultry to be noneviscerated, with head and feet intact.

C. Products that meet all inspection requirements and bear the marks of inspection are not religious exempt products. There is no need for a religious exempt certificate when products with label claims including “Halal,” “Kosher,” or another claim, bear the marks of inspection.

D. Any poultry products produced under a religious exemption cannot ever bear the marks of inspection. This includes any parts produced from religious exempt carcasses.

#### **IV. OFFICE RESPONSIBILITIES**

A. The Chief is to:

1. Review the establishment’s completed application to slaughter or process poultry under a religious exemption. The completed application will have been submitted by the establishment as part of their [Request for Meat Inspection Services, MI-86](#). The Chief is to verify that requested exempt activities are selected in Section III. Type of Operations. (Exemptions; Religious Exempt Poultry) of the application and that the establishment entered the required information from the religious authority on the continuation sheet on page 7 of the form. This is to include the requirements specified in [9 CFR 381.11\(a\)](#) for identifying and certifying the religious dietary laws that are in conflict with specific provisions of the Act and the regulations from which exemption is requested.
2. Issue a completed MI-Form 6030-1 Religious Exemption Certificate (Poultry) to the establishment for each exemption requested and approved.
3. Maintain a copy of the completed MI-Form 6030-1 on file in the Establishment’s file.
4. Send a copy to the Inspector in Charge (IIC) at the establishment to provide information on the regulations from which the establishment is exempt.
5. Update the establishment profile in PHIS using the instructions in VT Directive 5220.1, *Granting or Refusing Inspection Voluntary Suspending or Withdrawing Inspection and Reinstating Inspection Under PHIS*.

## V. IPP GENERAL VERIFICATION RESPONSIBILITIES

A. To ensure the approved exemption status is implemented appropriately, IPP are to:

1. Verify that the establishment has a corresponding Religious Exemption Certificate (MI- Form 6030-1) issued by the Chief for each exemption activity conducted, including the following:
  - a. If an establishment further processes religious exempt carcasses into religious exempt parts, the establishment has a separate certificate for that activity regardless of whether the carcasses are from birds slaughtered at the same establishment under a religious exempt certificate or received from another establishment with a religious exempt certificate.
  - b. Ensure neither poultry produced under a religious exemption, nor any of its parts, subsequently receive the marks of inspection. IPP are to be aware that poultry must undergo all the required post-mortem inspection procedures to bear the marks of inspection. Because IPP are unable to visualize the hock joints on carcasses with the feet attached or examine the viscera or internal surfaces in noneviscerated carcasses during post-mortem inspection, these carcasses and their associated parts are not eligible for the marks of inspection. In addition, poultry carcasses with heads or feet intact are not eligible to bear the marks of inspection because they do not meet the ready-to-cook definition ([9 CFR 381.1](#)), which requires removal of the head and feet.
2. Contact the Chief or your supervisor for further instructions if there is not an exemption certificate for each type of religious exempt activity conducted at the establishment.
3. Verify and update the PHIS Establishment Profile as necessary, under the General page and Exemptions tab for the approved exemptions as per the instructions in [FSIS Directive 5300.1, Managing the Establishment Profile in the Public Health Information System](#).
4. Recognize that for the production of poultry products following all regulatory requirements, and bearing the marks of inspection, a religious exemption is not required or appropriate. Products with a special “Halal,” “Kosher,” or other religious claim with the marks of inspection are not religious exempt products. Inspection program personnel are to follow the instructions in VT Directive 7221.1, *Prior Labeling Approval* for regulatory verification of these labels. The PHIS profile for establishments producing only inspected products, even those with special religious label claims, do not need any special notation.
5. Religious exempt poultry products are not subject to the pathogen reduction performance standards, so FSIS does not perform verification sampling (VT Directive 10,250.1, *Salmonella and Campylobacter Verification Program for Raw Poultry Products*). Religious exempt poultry products are eligible for directed (surveillance) residue testing through the National Residue Program (NRP).

B. IPP are to verify that establishments with approved religious exemptions:

1. Meet all regulatory requirements from which the establishment has not been exempted, including but not limited to:
  - a. Ante-mortem and post-mortem inspection ([9 CFR 381.70\(a\)](#), [9 CFR 381.76\(a\)](#)). IPP are to follow instructions in VT Directive 6100.3, *Ante-Mortem and Post-Mortem Poultry Inspection* Post-mortem inspection is limited to external surfaces of exempted noneviscerated carcasses;

**NOTE:** The specific post-mortem inspection requirements are provided in [9 CFR 381.76](#) and vary by type of inspection, i.e., Traditional Inspection, the Streamlined Inspection System (SIS), the New Line Speed (NELS) Inspection System, the New Poultry Inspection System (NPIS), the New Turkey Inspection System (NTI), and Ratite Inspection.

- b. Passing of carcasses and parts ([9 CFR 381.79](#));
  - c. Poultry Good Commercial Practices ([9 CFR 381.65\(b\)](#)). IPP are to follow instructions in [FSIS Directive 6110.1](#), *Verification of Poultry Good Commercial Practices*);
  - d. Contamination ([9 CFR 381.91](#));
  - e. Sanitation ([9 CFR part 416](#));
  - f. Hazard Analysis and Critical Control Point (HACCP) Systems ([9 CFR part 417](#));
  - g. Prohibition of poultry carcasses with visible fecal material entering the chiller ([9 CFR 381.65\(f\)](#));
  - h. Control of contamination throughout the slaughter and dressing operations ([9 CFR 381.65\(g\)](#) and [9 CFR 381.65\(h\)](#)) including:
    - i. recordkeeping and sampling requirements in [9 CFR 381.65\(g\)](#) and [9 CFR 381.65\(h\)](#);
    - ii. a sampling program that effectively demonstrates process control; and
  - i. All requirements of the Ready-to-cook definition in [9 CFR 381.1](#) other than those that conflict with the religious dietary laws.
2. Do not further process noneviscerated carcasses while in a noneviscerated state. Religious exempt poultry carcasses produced under a noneviscerated Confucian or Kosher exemption are not further processed into cut-up parts, giblets, feet, or necks while they are in a noneviscerated state because doing so could create insanitary conditions. Noneviscerated poultry carcasses produced under a religious exemption are permitted to be eviscerated later (delayed evisceration) and further processed under a separate religious exemption certificate at either the same establishment or at another official establishment.
3. Demonstrate clear separation, by time or space, of religious exempt products from products that are receiving the marks of inspection. For multi-ingredient products, this required separation would include preventing ingredients that come into contact with religious exempt products from contacting carcasses or parts intended to receive the marks of inspection (e.g., the pickle solutions used for curing eviscerated Buddhist exempt carcasses are not to be used on products that will bear the marks of inspection). If IPP observe any incidental contact between religious exempt products and products receiving the marks of inspection, they are to assess the specific facts of the situation to determine whether this incidental contact creates an insanitary condition or contaminates or adulterates products.

C. IPP are to follow the methodology in [VT Directive 5000.1](#), *Verifying an Establishment's Food Safety System* to verify the establishment's compliance with the pathogen reduction, sanitation, and HACCP regulations that are applicable to an establishment that is operating under a religious exemption.

## **VI. INSPECTION VERIFICATION SPECIFIC TO LABELING REQUIREMENTS (MANDATORY AND OPTIONAL)**

A. For mandatory labeling requirements, IPP are to verify that:

1. The producing establishment has the approved label record on file. Sketch labels for products which are produced under a religious exemption are required to be submitted for approval.
2. Labels for religious exempt items in immediate containers bear the features in paragraphs a-f below. Such religious exempt items include eviscerated carcasses, parts, or giblets packaged in immediate containers, e.g., bags, tray packs, cartons, etc.
  - a. Statement that the products were processed under a Buddhist, Confucian, Islamic (Halal), or Judaic (Kosher) exemption, or a statement of equal meaning (e.g., “for Buddhist religion”);
  - b. Name of the religious official or organization under whose supervision the poultry was slaughtered;
  - c. Signature Line or producing establishment’s name and address or city, state, and zip code when listed in a public directory ([9 CFR 381.122](#));
  - d. Establishment number;
  - e. Product Name – Products must be identified according to the Standards for Kinds and Classes and for Cuts of Raw Poultry in [9 CFR 381.170](#). In addition, the name must be descriptive according to [9 CFR 381.117](#) for carcasses that are not dressed in the same manner as inspected and passed carcasses. The name must include applicable terminology for noneviscerated, head-on, or feet intact characteristics. Mechanically separated poultry must comply with the requirements in [9 CFR 381.173](#) and [9 CFR 381.174](#); and
  - f. Ingredients Statement if the product is fabricated from two or more ingredients. The ingredients must be listed as safe and suitable for use for the purpose intended (IPP are to follow instructions in [FSIS Directive 7120.1](#), *Safe and Suitable Ingredients Used in the Production of Meat, Poultry and Egg Products*).
3. Other items for retail sale are individually identified.

**NOTE:** Carcasses or parts for retail sale and not in an immediate container must be affixed with tags (“wing tags”) labeled according to section VI, A, 2 above.

4. Labels for the following non-retail packaged products include the following required additional labeling features:
  - a. Labels for religious exempt items packaged for hotel, restaurant, and institutional (HRI) trade channels must be labeled as follows:

Individual carcass identification or identification of unlabeled individual packages (protective coverings) for Buddhist or Islamic exempted poultry are not required for eviscerated bulk packed poultry solely intended for HRI, provided that the large immediate container:

    - i. Bears the features described in section VI, A, 2 above; and
    - ii. Bears one of the following appropriate exemption statements:

“Noneviscerated Poultry Processed under USDA Exemption Permit No. –“ with the establishment number as the permit number; or

“Eviscerated Poultry Processed under USDA Exemption Permit No. –“ with the establishment number as the permit number.

iii. Statement of limited use (e.g., “For HRI Only”) is recommended but not required.

b. Labels for shipping containers for religious exempt poultry bear the following features:

i. Signature Line or producing establishment’s name and address or city, state, and zip code when listed in a public directory ([9 CFR 381.122](#)); and

ii. One of the following appropriate exemption statements:

“Noneviscerated Poultry Processed under USDA Exemption Permit No. –“ with the establishment number as the permit number; or

“Eviscerated Poultry Processed under USDA Exemption Permit No. –“ with the establishment number as the permit number.

B. Optional labeling features that are truthful and not misleading may be included on immediate containers or shipping containers of religious exempt products. Labeling for religious exempt products may bear additional mandatory features of inspected and passed poultry products ([9 CFR 381 Subpart N](#)), except that the labeling does not indicate that the products were inspected and passed. IPP are to verify the following optional features are accurate if they are included on the label:

1. Handling Statement – Recommended for product safety and is to meet the requirements of [9 CFR 381.125\(a\)](#);
2. Net Weight Statement – to meet the requirements of [9 CFR 381.121](#);
3. Safe Handling Instructions – to meet the requirements of [9 CFR 381.125\(b\)](#), except the first sentence of the rationale statement is not permitted since the products are not inspected and passed. This feature is recommended for product safety;
4. Nutrition Facts – Not required on religious exempt products, unless a nutrition claim is made on the labeling and is to meet the requirements of [9 CFR Part 381 Subpart Y](#);
5. Other labeling information may be used, provided that the labeling is truthful and not misleading ([9 CFR 381.129](#)); and
6. Special statements including logos, trademarks, and other symbols on labels that are generally not defined in FSIS regulations or the [FSIS Food Standards and Labeling Policy Book](#) must be submitted to FSIS for approval. Special statements and claims include “natural” and “organic”, health claims, ingredient and processing method claims (e.g., high-pressure processing), animal raising claims (e.g., no antibiotics added, free range), and organic claims. For more information about special statements and claims, see: VT Directive 7221.1.

C. Changes to labels of religious exempt products may not be approved generically.

D. Label Examples for Religious Exempt Products:

1. Basic label for single ingredient religious exempt product, no voluntary features:

TMB Ranch, Inc.  
 1234 Special Rd., Elsewhere, VA 54321

**Whole Chicken, head on, feet on**

Eviscerated Zabiha Halal poultry.  
 Processed under USDA Exemption No.  
 P-42

Hand Slaughtered under the Islamic  
 Society.

2. Label for religious exempt product with multiple ingredients with voluntary special claims:

**Halal**  
**Whole Chicken**  
 with 20% Lemon Pepper Sauce  
 Eviscerated head on and feet on.  
 May be missing giblets and/or necks.  
**Organic Free Range\***

\*In accordance with the National Organic Program.

Eviscerated poultry.  
 Processed under USDA Ex-  
 emption No. P-42

Hand Slaughtered under the  
 Islamic Society.

Ingredients: Organic eviscerated whole  
 chicken with head-on feet-on, Organic  
 lemon pepper sauce (water, soybean oil,  
 seasoning mix (salt, pepper, modified  
 cornstarch, paprika, dried lemon peel,  
 garlic, sugar, citric acid, onion powder,  
 garlic powder, oleoresin turmeric, lemon  
 oil), vinegar).  
**CONTAINS: Soy**

**KEEP FROZEN**

**NET WT. 6 LBS.**

TMB Ranch, Inc.  
 1234 Special Rd., Elsewhere, VA 54321

Certified Organic by True2Earth

**Safe Handling Instructions**

Some food products may contain bacteria that could cause illness if the product is mishandled or cooked improperly. For your protection, follow these safe handling instructions.

-  Keep refrigerated or frozen. Thaw in refrigerator or microwave.
-  Keep raw meat and poultry separate from other foods. Wash working surfaces (including cutting boards), utensils, and hands after touching raw meat or poultry.
-  Cook thoroughly.
-  Keep hot foods hot. Refrigerate leftovers immediately or discard.

## VII. DOCUMENTATION AND ENFORCEMENT

IPP are to conduct tasks as applicable and in accordance with the directives listed above in [Section V, IPP General Verification Responsibilities](#). When documenting noncompliance, IPP can reference applicable Directives including the instructions in [VT Directive 5000.1](#). IPP are to take regulatory control action as needed on religious exempt products under [9 CFR part 500](#) Rules of Practice.

## VIII. QUESTIONS

Refer questions regarding this directive to the office at 802-828-2426.

*Christine M. Madsen DVM*

Head of Service  
VT Meat Inspection Service