

Custom Exempt Operations Requirements: Guidance & Checklist

This document summarizes some of the key considerations and requirements for new custom exempt meat processing businesses and will help you obtain a license with the Vermont Agency of Agriculture Meat Inspection Program. As with any business, the steps may involve consultation with both local and state entities. This list is not all exclusive; additional steps may be required based on local, city, or county ordinances. This document can also provide guidance for processors who are already operating but are not yet licensed.

By reviewing this information, you can transition into your new business more smoothly. As each business situation is unique, you are encouraged to work directly with our Meat Inspection Staff throughout the process for additional guidance on your plan. Please ask questions and work with our Program as you navigate this process.

*Please note: **This document applies only for custom processors.** If you are interested in retail or wholesale operations, you will need to meet additional requirements.*

Getting Started

Building Permits, Zoning, and Local Codes

Check with your local authorities (City/County) to determine what local permits may be needed.

- Fire
- Electrical
- Occupancy
- Plumbing
- Septic System/Wastewater
- Local Zoning

Plan Review

Review building plans with the Vermont Meat Inspection Program Chief or authorized designee. The plan review process is usually an informal process done through individual consultation and communication.

Please note: Any facilities that will also operate a retail establishment (produce meat for sale) must contact the Vermont Meat Inspection Program to determine the retail portion of the facility meets the requirements.

Water Sources

Establish a potable water source for your meat processing facility. This may be municipal water, well, or spring.

- If you have a municipal water supply, you will need a letter attesting to the potability of the water or a copy of the water testing report. This can be acquired from the municipality.
- If you have a private well or spring, you will need to test your water prior to operating to ensure the water is potable and meets tests prescribed by the Environmental Protection Agency in its “Drinking Water Standards”. After starting your operations, you will need to test your water twice a year. Samples will need to be submitted to an accredited laboratory with results on file for inspection program personnel to review.

Note: [Vermont Public Health Laboratory](#) is an accredited laboratory.

Septic System/Wastewater Approval

Install and/or obtain approval for the septic system from your local county, township or local state government. You will need to provide a letter from the applicable authority to the Vermont Meat Inspection Program to verify that an adequate wastewater handling system is installed.

Plumbing System

Vermont plumbing systems must meet several requirements, including general regulations, materials, and building use. For questions, please contact the Department of Public Safety by calling 802-479-7564 or DPS.DFSlicensing@vermont.gov

- Potable water must be used in all areas where animals are slaughtered, eviscerated, and dressed as well as any areas where edible products are processed, handled, and stored.
- Both hot and cold water are required.
- The water distribution system must also:
 - Carry sufficient water throughout the facility
 - Carry sewage and liquid waste away from the facility
 - Prevent adulteration of water, supplies, equipment, utensils, or creation of insanitary conditions
 - Provide adequate floor drainage
 - Prevent backflow conditions and cross connections between piping
 - Prevent the buildup of sewer gases

Please note: Working with your plumber is the best way to ensure your system meets these requirements.

Sink Requirements

Ensure you have separate sinks for handwashing and washing equipment. Some flexibility in meeting these requirements is allowed. The following table provides additional information.

Type of Sink	Recommendations and Requirements
Three-compartment sink	Highly recommended for washing of equipment and utensils but is not required for custom exempt only operators.
Hand wash sink	Should be in the processing or slaughter room, at a minimum it must be conveniently located to the processing/slaughter area. A conveniently located sink is one that can be easily accessed without touching other surfaces.
Mop-service sink	Recommended for cleaning floors but is not required for custom exempt only operators.

Other Facility Requirements

Ensure all surfaces are constructed of smooth, easily cleanable, non-porous, non-absorbent materials.

- Walls and ceilings must be finished with materials that meet this standard. Examples include glass board, sealed concrete, metal, ceramic tile, etc. Exposed wood is NOT permissible.
- Floors must be maintained in good repair and easily cleanable. Concrete is an acceptable option if it is sealed or non-porous.

Provide adequate space for processing and slaughter activities.

- Ideally, the processing and slaughter facilities should be divided into at least two rooms.
 - The first room would be dedicated for killing and dressing. A hand wash sink must be conveniently located for food handlers working in the room.
 - The second room would be dedicated for processing the carcass and meat products that are manufactured. A hand wash sink must also be conveniently located for food handlers working in this room.

- Ensure your facilities are large enough to accomplish the needed tasks. Important considerations are rail height, cooler sizes, and storage space.

Licensing

Have your facility inspected for licensing – this must be done before a license can be issued. Program Section Chief or designee will conduct the onsite inspection. Submit an [Application of Meat Handlers Operation License](#) along with a fee of \$150.00 per license.

Operating Your Meat Processing Business

Once you begin operations, inspection personnel will perform unannounced periodic inspections. This inspection will vary upon your business size, scope, and operating season. The following provides a lists of specific areas inspection personnel will examine.

Sanitation

Sanitation, including cleaning of equipment and facilities, is a very important part of producing safe food. As a meat processor you must ensure your facility is clean while you operate so that the meat and poultry products do not become contaminated.

- Hot water is necessary to properly wash hands and clean equipment.
- Equipment needs to be cleaned daily after operations. Also, each day before you begin operations, check the equipment to ensure it is clean.
- Cleaning of floors, walls, vents, and especially ceilings is important to ensure the environment does not contaminate your products.
- Sewage and waste removal systems must adequately remove sewage waste, and water – manure, feathers, ingesta, trash, garbage, and paper are all examples of waste that must be properly removed.

Hand washing and Employee Hygiene

Hand washing is an important part of producing safe food. Remind employees to use soap when washing their hands. All hand sinks must be stocked with soap and single-use towels. Clothing should be clean. Sick employees should stay home from work.

Handling Carcasses

As a custom exempt operator, you will likely be handling carcasses either through your own slaughter process or from meat products brought into your plant.

- All carcasses must be visibly free of fecal matter, dirt, ingesta, hair, milk, bile, or any other contamination.

- If you accept farm slaughter carcasses, all carcasses must be free of any visible contamination prior to storage or further processing. Contamination must be trimmed, rather than washed off carcasses.

Pest Control

Your pest control program must be capable of preventing product adulteration from pests, such as rodents or flies. Preventing entry of these animals into your plant is critical to your operations. Openings (doors and windows) leading to outside or to inedible areas must close effectively and completely fill the opening. Areas inside and outside the establishment must also be maintained to prevent harborage of rodents and insects.

Inedible Material Control

Inedible materials are those by-products of slaughter and processing that cannot be used for human food. These products must be disposed of appropriately. Specifically:

- Containers supplied by a rendering company must be labeled as inedible and **may not** be relabeled and used as edible food handling containers.
- All inedible products must be denatured so that they cannot be used for human food.
- Inedible products must be disposed of using an approved method for the type of product you have. This may vary by species.

Marking and Labeling Control

Because custom exempt products may not be sold, product labeling is important to ensuring products are not inadvertently sold or combined or co-mingled with other products. Specific requirements include:

- All custom carcasses and packaged product must be marked “NOT FOR SALE”.
- Livers, hearts, and tongues must also be legible marked as “NOT FOR SALE” before they leave the kill floor. They must be returned to the owner of that animal or disposed of as inedible material.
- **All** custom processed meat must be returned **to the owner of the animal** or otherwise be denatured.

Records and General Operation

Meat processors must also keep records about their activities and customers. These records are part of the general operational procedures used to ensure products are controlled and separate from those produced for sale and/or for individual customers. The following are required:

- Providing adequate separation of retail (for sale) and custom product (not for sale), if both are present.
- Maintaining records of all animals or carcasses brought in for slaughter or processing. The name and address of the owner of the animal, or carcass, the date, how many animals were brought to the operation and the types and quantities of product prepared.
- [Certificate of Ownership \(Slaughter-Process\)](#) or [Certificate of Ownership \(Processing Only\)](#). These forms are signed by the owner(s) of the carcass(s). Feel free to print an adequate number of these forms, or you can request blank forms from the office by calling 802-828-2426 or agr.meatinspection@vermont.gov
- Smokehouse and cooking records that document cook times and temperature. This ensures that the custom exempt products are cooked and cooled properly and are not adulterated. Cooking and cooling information and support can be found in the [Appendix A USDA FSIS Compliance Guidelines](#) and [Appendix B FSIS Compliance Guidelines](#).
- Preparing cured and/or smoked meat must maintain product formulations to demonstrate those cured products are within the limit of added nitrites and/or nitrates.
- [Maintain monthly production reports](#) that document the number and kinds of custom livestock slaughtered (if applicable), the quantities and types of custom production prepared. This form must be submitted to the Vermont Meat Inspection Program each month either by mail or email. Directions are on the form.
- For seasonal facilities or if a temporary closure is needed due to vacations, sick leave, etc., a [Notice of Temporary Custom Plant Closing](#) must be completed and sent to the Vermont Meat Inspection Program prior to closing. This notice will alert our inspection staff, so we don't make unnecessary visits while your business is closed.

For more information:

Contact us at AGR.Meatinspection@vermont.gov or call at 802-828-2426