

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



MIS DIRECTIVE

Adopted from FSIS Directive 6420.2

6420.2	3/1/20
Revision 2	

VERIFICATION OF PROCEDURES FOR CONTROLLING FECAL MATERIAL, INGESTA, AND MILK IN LIVESTOCK SLAUGHTER OPERATIONS

CHAPTER I -- GENERAL

I. PURPOSE

This directive provides inspection program personnel (IPP) with the current method for protecting public health by verifying, documenting, and enforcing the requirement that there be no visible fecal material, milk, or ingesta on livestock carcasses at or immediately after the final rail, and for verifying that feces, ingesta, and milk are not present on head, cheek, and weasand meat at packing. In this revision, FSIS increased the livestock carcass sample size in Attachment 1. This change will help the Agency better analyze data from establishments that operate under traditional inspection and the New Swine Slaughter Inspection System (NSIS).

II. CANCELLATION

VT Directive 6420.2, Rev. 1, Verification of Procedures for Controlling Fecal Material, Ingesta, and Milk in Slaughter Operations

III. BACKGROUND

A. In slaughter establishments, contamination of carcasses and parts from feces, ingesta, and milk are primary avenues for the spread of pathogens. Pathogens may reside in fecal material, both in the gastrointestinal tract and on the exterior surfaces of the animal going to slaughter. Without care being taken in handling and dressing procedures during slaughter and processing, the edible portions of the carcass can become contaminated with bacteria capable of causing illness in humans. Once introduced into the establishment environment, the organisms may be spread from carcass to carcass or by other means. VAAFM enforces a "zero tolerance" standard for visible fecal material, ingesta, or milk on carcasses and parts at the time of inspection.

B. One approach that VAAFM takes to minimize the occurrence of pathogens on meat is to verify that feces, ingesta, and milk do not contaminate livestock carcasses and parts, or if they do, that they are properly removed. VAAFM provides instructions to IPP on how to verify that meat from heads, cheeks, and weasands - livestock carcass parts used in the manufacture of ground meat (e.g., ground beef) - that may become contaminated with feces, ingesta, or milk - are not contaminated with these substances. If the meat from these parts is contaminated, it represents a way of introducing pathogens into ground meat products. VAAFM wants to ensure that the possibility of contamination with pathogens is reduced to the extent possible.

C. Some ground meat components (e.g., head, cheek, and weasand meat) may not be attached to the carcass at the time that the carcass passes the final rail. IPP are to verify that these parts are not contaminated by fecal material, ingesta, or milk at the end of the harvesting process e.g., at the packaging step or when the product is placed into a container for storage.

D. VAAFM has instructed IPP that they have access to the results of any testing and of any monitoring activities that are performed that may have an impact on the establishment's hazard analysis (See VT Directive 5000.2). IPP must review results on at least a weekly basis.

E. In addition to zero tolerance verification, IPP verify compliance with HACCP requirements and verify that establishment controls incorporated into the establishment's HACCP system ensure all meat and meat by-products (e.g. offal) are safe, wholesome, clean, and free of contamination using the Slaughter HACCP Verification task. See instructions in VT Directive 5000.1, Verifying an Establishment's Food Safety System.

CHAPTER II -- LIVESTOCK FECAL MATERIAL, INGESTA, AND MILK INSPECTION

I. GENERAL

9 CFR 310.18(a) states: *Carcasses, organs, and other parts shall be handled in a sanitary manner to prevent contamination with fecal material, urine, bile, hair, dirt, or foreign matter; however, if contamination occurs, it shall be promptly removed in a manner satisfactory to the inspector.*

A. Under 9 CFR 417, a HACCP plan must include, as appropriate, critical control points (CCPs) that are designed to control identified food safety hazards (9 CFR 417.2(c)(2)). Because fecal material is a vehicle for pathogens, and because virtually all slaughter establishments recognize that contamination of meat by pathogenic microorganisms from fecal material, ingesta, or milk is a food safety hazard that is reasonably likely to occur in the slaughter production process, IPP are to verify that slaughter establishments have adopted controls that they can demonstrate are effective in reducing the occurrence of pathogens, including controls that prevent contamination of carcasses with fecal contamination, milk and ingesta.

B. In each establishment slaughtering livestock, the activities of IPP include checks to determine whether the establishment is producing carcasses and head, cheek, and weasand meat that are not contaminated with fecal material, ingesta, or milk. (See 9 CFR 307.2(g), 310.3, 310.17(a), 310.18(a), and 318.2(b) and (d).)

II. ON-LINE INSPECTION RESPONSIBILITIES

A. When on-line IPP find feces, ingesta, or milk on the carcass and its parts during the postmortem inspection of each carcass and its parts, they are to verify the satisfactory removal of contamination before passing each carcass or part.

B. When the on-line carcass inspector find feces, ingesta, or milk, they are to stop the slaughter line to allow for trimming of the carcass by establishment personnel and reinspection of the carcass by the inspector unless the establishment has provided a rail-out loop:

1. For the purpose of moving contaminated carcasses off-line for trimming, reexamination, and positioning back on the line for final inspection; and
2. Determined by the Inspector-in-Charge (IIC) to be adequate to prevent accumulation of contaminated carcasses or cross-contamination of other carcasses.

C. On-line IPP who retain a carcass for veterinary disposition for pathology are not to authorize establishment trimming until after disposition by a public health veterinarian (PHV).

D. On-line IPP are to notify the IIC or the off-line inspector as directed by the IIC when they believe that:

1. An establishment's rail-out procedure is inadequate to prevent carcass accumulation or cross-contamination of other carcasses; or
2. An establishment's slaughter or dressing processes are not under control based on repeated presentation of contaminated carcasses for post-mortem inspection.

E. If the on-line head or viscera inspector finds contamination, the establishment must remove the contamination before the head or affected viscera or part can be passed. If the on-line head or viscera inspector repeatedly finds contamination, he or she is to notify the IIC or the off-line inspector as directed by the IIC.

III. LIVESTOCK VERIFICATION PROCEDURES

A. Off-line IPP verify the adequacy of the establishment's procedures to ensure that carcasses are not contaminated with fecal material, ingesta, or milk by the post-mortem rail inspection station, and that head, cheek, and weasand meat are not contaminated with fecal material, ingesta, or milk at the completion of the harvesting process using the Livestock Zero Tolerance Verification task. Livestock Zero Tolerance Verification tasks are to be scheduled at a minimum of once daily for each shift in PHIS. Additional directed tasks may be performed by the IIC when there appears to be a loss of establishment process control.

B. When performing a Livestock Zero Tolerance Verification task and verifying that carcasses are free of fecal material, ingesta, and milk, off-line IPP are to select carcass units at the post-mortem rail inspection station for examination on-line, or after the post-mortem rail inspection station (see [Attachment 1](#) for selection of carcass units) and before the final wash.

NOTE: To address any issues related to less than ideal slaughter floor design, inspectors' safety, or presentation of carcasses or parts, the IIC and FLS can develop appropriate temporary or alternate procedures or arrangements with establishment management in order for IPP to properly conduct this inspection task per [9 CFR 307.2](#).

C. Verifying that the establishment's HACCP process is controlling fecal material, ingesta, or milk contamination during the carcass production process, off-line IPP are to:

1. Determine the expected slaughter volume for that day;
2. Determine the number of carcass units based on daily slaughter volume (see [Attachment 1](#));

3. Randomly select the appropriate number of carcass units during each shift;
4. Examine the entire carcass of each selected carcass using the technique that on-line IPP use at the post-mortem rail inspection station;
5. Identify foreign material as fecal material or ingesta only when both the color and texture characteristics are identifiable (see [Attachment 2](#)); and
6. Identify foreign material as milk only when both the color and consistency characteristics are identifiable (see [Attachment 2](#)).

D. When verifying that head, cheek, and weasand meat are free of fecal material, ingesta, and milk, off-line IPP are to select product at the end of the harvesting process, after all of the establishment controls and interventions are completed. This verification may occur at the time of packaging or when the product is placed in a container for storage. 9 CFR 417.5(a)(2) requires that the establishment maintains a written HACCP plan, including decision-making documents associated with the selection and development of the CCPs and critical limits, and documents that support both the monitoring and verification procedures, sample size, and the frequency of those procedures. IPP are to examine no less than the amount of product as the establishment has listed in its HACCP plan for the monitoring procedure.

E. When off-line IPP perform the Livestock Zero Tolerance Verification inspection task and find fecal contamination, milk, or ingesta on carcasses or head, cheek, or weasand meat, IPP are to verify that the establishment implements corrective actions that meet the requirements of 417.3 using the Slaughter HACCP Verification task. See VT Directive 5000.1, Verifying an Establishment's Food Safety System

CHAPTER IV-- DOCUMENTATION

A. If off-line IPP performing a Livestock Zero Tolerance Verification task do not observe any fecal material, ingesta, or milk on livestock carcasses or in samples of head, cheek, or weasand meat selected for examination, IPP are to mark the task as performed on the task schedule. See FSIS Directive 13,000.1, Scheduling In-Plant Inspection Tasks in the Public Health Information System (PHIS) .

B. If off-line IPP performing a Livestock Zero Tolerance Verification task find identifiable fecal material, ingesta, or milk on any carcass or in samples of head, cheek, or weasand meat selected for examination, IPP are to notify the establishment, complete the task, and then document noncompliance using PHIS.

NOTE: 9 CFR 310.18 is the only mandatory regulation to verify when performing the Livestock Zero Tolerance Verification task.

C. If IPP are aware of a history of multiple zero tolerance noncompliances being documented while performing the Livestock Zero Tolerance Verification task, IPP are to review instructions regarding association of NRs in VT Directive 5000.1 Chapter V, Part VII, Trends of Noncompliance. Prior to completing an NR representing a potential noncompliance trend, IPP are to review additional instructions under Chapter V – Enforcement, below.

D. If off-line IPP have determined noncompliance while performing the Livestock Zero Tolerance Verification task, IPP are to verify any remaining corrective actions by performing the Slaughter HACCP Verification task. See VT Directive 5000.1.

CHAPTER V -- ENFORCEMENT

A. When repeated noncompliance findings are associated (i.e. related, connected) and indicative of systemic problem with the establishment's slaughter HACCP system, the IIC is responsible for communicating such findings with the establishment during weekly meetings and with the supervisor at the next opportunity. When evaluating the justification for additional enforcement actions to be discussed with the front line supervisor (FLS), the IIC should seek answers to questions such as:

1. What is the rate of noncompliance? Has the rate increased or decreased over various time periods?
2. Has the establishment implemented meaningful preventive measures?
3. Does establishment testing for pathogens or indicator organisms indicate a problem with the sanitary dressing procedures or overall sanitation in the establishment? See VT Directive 5000.2, *Review of Establishment Data by Inspection Personnel*.
4. Are there indications that other parts of the HACCP system are not appropriately designed to prevent food safety hazards?
5. Are all parts of the HACCP system being implemented as designed?
6. Are there indications that the establishment's antimicrobial interventions are not operating as intended or corrective actions are not effective?

B. If the IIC determines that repetitive findings of fecal material, ingesta, and milk might represent a developing trend and lead to further enforcement actions, the IIC is to ensure IPP noncompliance determinations and documentation support such enforcement actions.

C. The IIC is to review the information associated with the rules of practice outlined in 9 CFR Part 500 and VT Directive 5000.1, *Verifying an Establishment's Food Safety System*, Chapters V, Documentation and Enforcement, and Chapter VI, Rules of Practice.

CHAPTER VI -- QUESTIONS

Refer questions regarding this directive to the Policy Development Staff through [askFSIS](#) or by telephone at 1-800-233-3935. When submitting a question, use the Submit a Question tab, and enter the following information in the fields provided:

Subject Field: Enter **Directive 6420.2**.
Question Field: Enter question with as much detail as possible.
Product Field: Select **General Inspection Policy** from the drop-down menu.
Category Field: Select **Slaughter** from the drop-down menu.
Policy Arena: Select **Domestic (U.S.) Only** from the drop-down menu.

When all fields are complete, press **Continue** and at the next screen press **Finish Submitting Question**.

Refer questions through supervisory channels.

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Livestock Carcass Examination

Based on the expected slaughter volume for that shift (number of animals), inspection program personnel (IPP) are to determine the number of carcasses or carcass sides to be examined using the following table.

Livestock Carcass Sample Size		
Number of Animals Slaughtered per Shift	Number of Carcasses to be Sampled per Shift	Number of Sides (hind and forequarters) to be Sampled per Shift
100 or fewer	2	4
101 to 250	4	8
251 to 500	8	16
More than 500	12	24

- a. Select the appropriate number of carcass units randomly.
- b. Examine the selected carcass units using the same systematic inspection technique that IPP use at the post-mortem rail inspection station in FSIS Directive 6100.2.
- c. IPP performing zero tolerance verification may separately and independently examine the designated number of hind quarters and forequarters to verify the appropriate number of sides or carcasses.

Identification of Contaminants for Livestock

To verify carcasses and parts are free of feces, ingesta, or milk contamination known to be vectors for pathogens that represent food safety hazards, inspection program personnel (IPP) are expected to first identify the contamination. Feces, ingesta, or milk can be identified by color, texture, and consistency.

The actual appearance of feces and ingesta reflect the diet, age of the animal, type of animal (functioning rumen; non-ruminant) and regional feeding practices. Therefore, the descriptions below are guidelines and are not absolute. The PHV-IIC in each official establishment is the final arbiter regarding any disputed findings of feces, ingesta, or milk representing zero tolerance noncompliance.

A. Livestock Feces and Ingesta

IPP are to identify foreign material as feces or ingesta based on two factors: color and texture.

Basic Criteria for Identification of Feces on Livestock Carcasses				
	Cattle		Swine	Sheep and Goat
	Cattle; and Heavy Calf (ruminating)	Calf (non-ruminating)		
Color	Yellow, green, or brown.	White, yellow, tan.	Yellow, green, tan, or brown.	Green, brown, to black.
Texture	Fibrous or plant-like texture; may include grain particles depending on diet.	Pasty	May include identifiable grain particles, or fibrous plant material.	Fibrous or plant-like; feces or ingesta may also be tarry.
Size:	The size or quantity of feces or ingesta is largely unimportant in identifying fecal or ingesta contamination. However, as size decreases, color and texture become more difficult to discern.			

NOTE: Bile is a contaminant on carcasses and parts per 9 CFR 310.18 but is not counted as a zero tolerance defect.

B. Milk

IPP are to identify foreign material as milk based on two factors: color and consistency.

Milk, if present, tends to be found on the midline, during or after removal of mammary glands (udder) from lactating animals.

Criteria for Identification of Milk on Livestock Carcasses			
	Cattle	Swine	Sheep and Goat
Color	Clear to white to light yellow.		
Consistency	Watery to ropy or curdy.		