

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 10,800.3

10,800.3

3/31/22

PRIORITIZING INSPECTOR-GENERATED SAMPLING UNDER THE NATIONAL RESIDUE PROGRAM FOR MEAT AND POULTRY PRODUCTS

I. PURPOSE

This directive provides instructions to inspection program personnel (IPP), on deciding which carcasses to select for inspector-generated sampling under the National Residue Program (NRP) for meat and poultry products.

KEY POINTS:

- *Public Health Veterinarians and IPP should use this list in conjunction with their professional judgement to prioritize selection of carcasses for KIS™ Testing*
- *Public Health Veterinarians (PHVs) have professional discretion when determining carcasses to choose for residue testing*

II. BACKGROUND

FSIS conducted a data analysis in 2015 and 2016 of FSIS residue violations and found that certain pathological conditions were more likely to show a laboratory-confirmed positive residue test result compared to other pathologic conditions. A survey of FSIS Public Health Veterinarians (PHVs) found they wanted more information on decision-making criteria for selecting carcasses for Kidney Inhibition Swab (KIS™) testing. To meet the needs identified by the PHV survey and to advance a data-driven approach to agency decision making, FSIS is providing information on pathologic conditions for PHVs to consider when selecting carcasses for conducting KIS™ testing.

The State Meat and Poultry Inspection Service operates in conjunction with FSIS and federal-state relations to ensure uniform and consistent implementation of the NRP.

6 V.S.A. § 3305 (8)...The federal meat inspection regulations and federal poultry inspection regulations of the U.S. Department of Agriculture, Title 9, Code of Federal Regulations, Chapter 3, 9 CFR §§ 300.1 et seq., together with any amendments, supplements, or revisions thereto, are adopted as part of this chapter.

III. IPP RESPONSIBILITIES FOR PRIORITIZING PATHOLOGIES AND CONDITIONS WARRANTING CARCASS RETENTION AND SAMPLING

- A. At slaughter, IPP are to look for indications of violative chemical use or exposure and collect tissue samples for residue analysis as part of verification of the food safety system. Depending on the slaughter class involved, there are pathologies that, if found, may also indicate residue testing is appropriate.
- B. The PHV, or IPP under the direction of the PHV, is to perform a KIS™ test on any carcass suspected of containing violative levels of chemical residues and on any carcass exhibiting signs of systemic conditions (e.g., septicemia, peritonitis, pyemia). The PHV is to use professional judgment when selecting carcasses for chemical or drug residue testing based on evidence of acute or subacute disease conditions, pathological lesions, production practices, herd history, environmental exposure, and threats to homeland security. The PHV is to test animals for chemical residues when they are identified as U.S. Suspect for chemical residues during antemortem inspection and when post-mortem findings may indicate antimicrobial treatment, violative chemical use or exposure, even if the carcass and its parts have been condemned.
- C. The following list contains pathologies and conditions, based on the Agency's analysis, that may warrant testing of carcasses for chemical residues. When observed, the PHV is to prioritize the selection of these carcasses for residue testing. Whenever needed, PHVs are to refer to [FSIS Entry Training for the Public Health Veterinarian modules](#) for information on making ante-mortem and post-mortem dispositions.

1. Dairy Cows

- a. Lung Abscess;
- b. Nephritis/Cystitis;
- c. Injection site; or
- d. Abdominal abscess/Recent surgery

2. Bob Veal

- a. Pneumonia;
- b. Emaciation;
- c. Injection site; or
- d. Pyemia/Septicemia

3. Beef Cows and Bulls

- a. Injection sites;
- b. Nephritis/Cystitis;
- c. Neoplasia; or

- d. Lung abscess
- 4. Steer and Heifers
 - a. Injection sites;
 - b. Repeat violators;
 - c. Arthritis; or
 - d. Lung abscess/Pneumonia
- 5. Sows and Boars
 - a. Injection site;
 - b. Metritis; or
 - c. Bruises/Injuries
- 6. Market Swine
 - a. Show animals;
 - b. Arthritis; or
 - c. Pneumonia
- 7. Feral Swine: No specific pathologies or conditions were identified
- 8. Mature Sheep/Lambs
 - a. Pneumonia;
 - b. Pyemia/Septicemia; or
 - c. Show animals
- 9. Goats: Pneumonia
- 10. Poultry: Since the KIS™ test is not validated for use in poultry testing post-mortem, IPP are to submit tissue samples for inspector generated residue testing in situations where a violative residue is suspected.

D. PHV's are to use professional discretion when deciding to conduct a KIS™ test, regardless of the conditions listed on the prioritized condition lists.

IV. DOCUMENTING KIS™ SAMPLING IN PHIS

IPP are to refer to the [PHIS Animal Disposition Reporting User Guide](#) for instructions on documenting KIS™ testing in PHIS. IPP are to refer to Directive 10,800.2 for instruction on conducting KIS™ test.

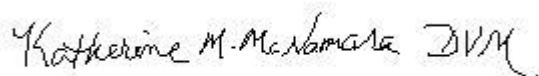
V. DATA ANALYSIS

The Office of Planning, Analysis and Risk Management (OPARM) will conduct data analysis on a rolling three-year window of NRP results. These results will be used to update, as needed, the list of prioritized conditions described in this directive.

VI. QUESTIONS

Refer questions regarding this directive to your immediate supervisor or to the Office of Policy and Program Development through [askFSIS](#) or by telephone at 1-800-233-3935. When submitting a question, complete the web form and select Residue as the Inquiry Type.

NOTE: Refer to [FSIS Directive 5620.1](#), *Using askFSIS*, for additional information on submitting questions.

A handwritten signature in black ink that reads "Katherine M. McNamara DVM". The signature is written in a cursive style.

Katherine McNamara, DVM
Head of Service
VT Meat and Poultry Inspection Service