

Participant Guide for Situation-Based Poultry Sanitary Dressing Training

Objectives: When presented with specific situations at poultry slaughter establishments, participants will be able to:

- Identify system components IPP need to review when performing the Poultry Sanitary Dressing task,
- Identify situations that represent compliance with sanitary dressing, and
- Identify situations that represent noncompliance with sanitary dressing, and
- Select appropriate actions to be taken.

Instructions: Each situation is to be read and discussed as a group with facilitation provided by the PHV, or designee. After discussing each situation, participants should have a thorough understanding of the proper response.

Situations

1. It is Monday and a routine Poultry Sanitary Dressing Task is scheduled for today.

- What systems information would you gather to perform the task?

During the previous week there were multiple slaughter food safety standards (zero tolerance) failures documented by both the establishment and FSIS.

MOIs reveal several discussions with management in the past few weeks regarding repeated fecal contamination of carcasses preparing to enter the chiller. Topics related to this issue that were discussed were feed withdrawal, variable bird size, incoming pathogen load, cage cleaning, water pressure and antimicrobial concentration in bird washes.

The establishment has a process control procedure (prerequisite program) for monitoring water

pressure and antimicrobial concentration for the inside/outside bird washer (IOBW) that is not being followed as written. The establishment is not measuring the concentration at the frequency stated in the prerequisite program. In addition, the water pressure gauge no longer works and maintenance personnel just visually check for adequate water pressure. When you question maintenance on their visual assessment they reply that the eyeball the sprayer to ensure pressure appears adequate. They mention they will try to replace the gauge this month. After watching birds with incidental contamination enter the IOBW, you notice some exiting the IOBW with some extraneous material. You notify the establishment and decide to perform a directed food safety standard zero tolerance test and FPS prechill test.

After randomly selecting 10 carcasses, you discover a fecal smear on the back of a carcass.

- How would you document this noncompliance?

While performing a prechill finished product standards (FPS) check on line 1, you notice an increase in ingesta in the birds, but subgroup absolute limit was not exceeded.

You proceed to the QC lab to review the establishment generic *E. coli* results. During the review you notice several instances of variable process control (marginal results) and one unacceptable result in the past week.

You access LEARN and find out that the most recent Salmonella set has failed.

- What are your conclusions for the outcome of the Sanitary Dressing Task?

- What would be your next steps?

2. While walking from the picking room to the eviscerating department you observe hundreds of birds lying on the floor around the automated carcass transfer machine and belt. The establishment employee backing up the equipment cannot keep up with birds falling from the transfer equipment and carcasses are falling to the floor.

- How would you handle this situation?

- Would this occurrence alone represent noncompliance with the sanitary dressing task?
Explain your answer.

3. On Monday, you are on your way to give breaks in the poultry evisceration department at Novosibar during slaughter operations. You observe numerous small intestines have wrapped around the food contact surfaces of the eviscerating machine. The eviscerator has visible fecal smears. You also observe that the eviscerating rinse system is not working at the present time. The rinse system is designed to clean the food contact surfaces of the eviscerator.

- What action do you take, if any?

- How would you document this?

- Would this event by itself be noncompliance with the Sanitary Dressing Task?

While documenting the noncompliance you notice that noncompliance was documented for the same situation during the previous week and you decide to associate this NR with that previous NR due to the same cause. You noted on the NR you are writing that the establishment's previous corrective measures were either not fully implemented or were ineffective.

Later that day, online personnel tell you about a trimmer not following good hygiene. You check it out and see that they are not cleaning their scissors after trimming contamination. You document SPS noncompliance citing 9 CFR 416.5(a) because the employee's product handling practices are not preventing the contamination of product

On Tuesday, you notice that the presenter at one station has contamination on gloves and continues to draw birds. You also notice that trimmers are storing knives in the hand wash sinks and using them without washing and sanitizing. You document (SPS noncompliance with 9 CFR 416.4(d) and 416.3(a), because the establishment employees were not protecting product from contamination during production and utensils were not being sanitized.

On Wednesday, you observe employees picking up birds from the floor and carrying several birds in one hand. They place the birds in a community tub. You document SPS noncompliance citing 9 CFR 416.5(a) because the employee's product handling practices are not preventing the contamination of product

On Wednesday, you also review establishment testing data as per directive 5000.2 and notice that they have 3 *Salmonella* positives in the last 2 weeks which is an increase over the previous 4 weeks.

Looking at previous MOIS that day you find that several discussions have taken place regarding employee hygiene and GMP nonconformance.

On Thursday, you observe establishment employees returning from lunch go to the line without washing their hands and then immediately handling product. The company has a GMP that requires employees to wash their hands prior to returning to work. You discuss your observations with the line supervisor and decide to include the matter on the agenda of the next weekly meeting

- You have a routine poultry sanitary dressing task on Friday. What would be your conclusions? Explain your answer.

4. You are a CSI assigned to a poultry establishment that slaughters young chickens. On Wednesday, you are observing offline reprocessing operations and notice that establishment employees are struggling to keep up with the number of birds being received in that area. Multiple contaminated birds are hung on single shackles and piles of unprocessed birds remain on the table.

- Has an insanitary condition been created?

You have a routine Poultry Sanitary Dressing Task scheduled for today.

- Does this finding alone represent noncompliance with the sanitary dressing task?

- What else would you consider as part of the Sanitary Dressing Task?

- For each of the above considerations, give one example of a finding that may lead to a determination that there is a loss of process control.

5. You are a relief inspector CSI, detailed to a new turkey establishment operational under a grant of inspection given six weeks ago. The full time inspector left you an inspection note in PHIS, explaining the establishment had carried some live birds over from 2nd shift Friday night due to a mechanical breakdown. Beginning Monday, there were numerous production interruptions; water pressure issues, line breakdowns, equipment malfunctions and electrical shortages. The establishment shut down early due to breakdown and elected to carry over several lots of live poultry to the following day. During the rest of the week the disruptions in operations continue and birds are held over between 24-48 hours after arrival. Due to miscommunications between establishment officials and growers, birds continue to arrive at the establishment intended for slaughter.

You have gotten feedback from online IPP about increased contamination events on carcasses.

You perform a food slaughter safety task Wednesday, on line 1 and find two birds with fecal smears.

- How would you proceed?

After checking establishment records you notice that the establishment has recorded fecal findings 2 times on Monday, once on Tuesday and 3 times today.

You proceed to check the week's giblet records and see that the establishment has exceeded the limits for extraneous material and recorded that intestines were found 3 times comingled with the giblets.

The establishment FPS records at prechill indicate increased levels of ingesta which the establishment attributed to crop rupture.

The PHV explains that extended feed and water withdrawal durations can result in friable guts leading to increased contamination rates during slaughter, dressing and evisceration. The feedback and contamination continue throughout the week.

After discussing with your supervisor, you initiate a directed sanitary dressing task since the routine ones have already been performed...

- Is there evidence of a systemic failure resulting in the creation of an insanitary condition?

6. You are a CSI assigned to an establishment that slaughters young chickens. During the summer months, the establishment makes an effort to conserve water by implementing a water reuse program addressed in the hazard analysis.

A routine SPS is on the schedule today and one of the performance standards to randomly verify is water reuse.

While examining conditions in the chiller, you notice that there is very little overflow. A program employee begins conducting a chlorine measurement in conjunction with the establishment's water reuse program. Their written parameters state that chlorine levels should be within 20-50ppm. The result recorded by the program employee is 1ppm.

- How would you proceed at this point?

After reviewing establishment chiller monitoring logs, it is determined that chlorine levels have been variable, sometimes falling below establishment parameters. You also noticed certain days where establishment employees have missed tests and failed to sample at the specified frequency.

After reviewing MOIs, there are several documented discussions of less than perfect implementation of their water reuse pre requisite program with regards to testing frequency, and maintaining appropriate chlorine levels.

You review previous NRs and find two associated preoperational sanitation NRs for failure to adequately clean the chiller. Organic waste and product residue were found on the paddles and the bottom of the chill tank.

After speaking with plant personnel regarding their red water maintenance system and filters, they reply that they recently ran out of filters and they are on back order. They should be in early next week.

- Do the missing filters represent noncompliance?

Later in the day while conducting FPS at the post chill location you find a higher than expected incidence of ingesta inside the carcasses, and noticed that the establishment exceeded their subgroup absolute limit.

Based on your findings, you proceed to the lab to check establishment microbiological testing results. Establishment results for the past month indicate some positive results for *Campylobacter* and *Salmonella*, demonstrating variable process control.

- Is there evidence of a systemic failure resulting in the creation of an insanitary condition?