



# Office Hours

Division of Food and Recreational Safety, Bureau of Meat and Poultry Businesses (BMPB)

WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION (DATCP)

November 10, 2023

# WELCOME

- Interim Administrator – Steve Ingham
- Deputy Administrator – Vacant
- Bureau Director – Paul Humphrey
- Regional Managers – Paul Pierce, Nicole Lukens, and Josh Knutson



# STAFFING UPDATE

## Current staffing vacancies

- Veterinarian – Sr. (NE WI)
- (15) Meat Safety Inspector positions
- (2) Food Scientist – Adv.
  
- Circuit I Supervisor starts December 4



# SAMPLING RESULTS – 2023 FISCAL YEAR

Microbial Sampling	Number of Viable Samples Analyzed	Number of Confirmed Positives Program-wide
Ground Beef ( <i>E. coli</i> O157:H7, Non-O157 STEC and <i>Salmonella</i> )	671	5 - <i>Salmonella</i> 1 – <i>E. coli</i> 045 1 - <i>E. coli</i> 0103
Beef manufacturing trimmings ( <i>E. coli</i> O157:H7, Non-O157 STEC and <i>Salmonella</i> )	287	1 - <i>Salmonella</i> 2 - <i>E. coli</i> 0121 1 - <i>E. coli</i> 045
Bench Trim ( <i>E. coli</i> O157:H7, Non-O157 STEC and <i>Salmonella</i> )	110	1 - <i>Salmonella</i>
Ready-to-eat Products <i>Listeria monocytogenes</i> and <i>Salmonella</i>	751	3





## REMINDERS

- Ensure sanitary dressing procedures are being followed.
- Ensure trimming and zero tolerance steps are being done as separate activities to ensure there is no fecal, milk, or ingesta contaminating the carcass.
- Verify spray solution for intervention is being mixed and applied to all surfaces of carcasses and parts according to the HACCP plan.
- Ensure SSOP is being implemented, chemicals are used according to the label, and monitoring occurs to verify equipment is clean.
- If using *Listeria* Compliance Guideline as support, make sure it is being followed to include three-to-five sites per testing event and rotating through all food contact surfaces.



# VENISON

Cut/grind/wrap customers' venison with meat from an amenable species (often beef or pork) added to final product.

Venison processor must hold a retail food establishment license. Added meat must be from an approved source.

\*Licensed retail food establishments must meet all applicable requirements of ATCP 75 before licensure.

Cut/grind/wrap customers' venison with customers' own pork/beef/other amenable species added to final product (product example: fresh sausage).

This custom-exempt meat processing activity will require the venison processor to hold either a federal grant of inspection or a meat establishment license from the Bureau of Meat and Poultry Businesses.



# VENISON

- Only accept wild game carcasses that are clean and unadulterated.
- Meat establishments must handle, store, and process wild game products in a manner that prevents contamination of other meat or poultry products.
- Garbage bags and other non-food grade containers or bags are not permitted for use in receiving or storing wild game.
- Keep processing and storage separated by time or space.
- All wild game processing, cutting, and smoking must be done at times, and in areas, where no other meat processing is being conducted.
- All areas and equipment where wild game processing occurs must be cleaned and sanitized before processing other meat products.



# VENISON

- Ensure products are labeled including clear identification of the species, “Not for Sale”, and the Wisconsin meat establishment number. Affixing the owner’s name helps ensure the meat is returned to the correct owner.
- Refer to Wis.Admin. Code §§ [ATCP 55.03\(11\)](#) and [55.08\(2\)](#) for more information on wild game processing and labeling requirements at licensed meat establishments.





# WHAT DOES BMPB EXPECT OF MEAT ESTABLISHMENTS?

- Respectful and cordial behavior.
- Good faith effort to comply with regulatory requirements.
- Availability and willingness to discuss production processes and controls.
- Corrective action is taken when control systems reveal a food safety hazard.
- Acknowledgement of all noncompliance findings - fix or appeal, but don't ignore.
- Immediate response to all findings of inhumane handling or product contamination.



# WHAT CAN MEAT ESTABLISHMENT EXPECT FROM BMPB?

- Respectful and cordial behavior.
- Truthful communication and honesty about intentions.
- Willingness to explain all inspection activities, and the “why”.
- Accurate information provided on regulatory requirements.
- Willingness to explain noncompliance findings, including the reason for the food safety or regulatory concern.
- Immediate intervention if animal handling practices are inhumane, or if product contamination, adulteration, or misbranding occurs.



# COMMUNICATING WITH YOUR BMPB INSPECTOR

- Take advantage of your weekly meetings with your Meat Safety Inspector.
  - Ask questions, discuss production updates (products, dates), Bureau updates, changes in directives, previous Memoranda of Interview (MOIs) or Noncompliance Records (NRs).
  - Provide updates on status of open NRs.



## RESPONDING TO AN NR

- A noncompliance record (NR) is a document communicating when a regulatory requirement has not been met.
- Establishments are expected to take appropriate measures to address the NR in a timely fashion.
  - Some things, like collecting cold spot data or making a repair, can take time.
  - Share your plans with your inspector and provide regular updates.
- Appealing the decision is an option.
- Don't ignore.



# COMMUNICATING WITH YOUR BMPB INSPECTOR

- Know your options when facing disagreements with inspection decisions.
  - First, remain calm.
  - Discuss the inspection decision with your inspector and provide your justification on why the observation is not a noncompliance.
  - If you cannot reach an understanding, a written appeal can be submitted.



# APPEAL PROCESS

- File an appeal without fear of retaliation.
- Appeal process follows the chain of command.
- Provide a written appeal with a rationale for why the noncompliance is not accurate or consistent with applicable regulations.
- All enforcement actions can also be appealed.

## Chain of Command

1. Meat Safety Inspector who made the finding
2. Circuit Supervisor
3. Regional Manager
4. Bureau Director
5. Administrator





## ADDITIONAL RESOURCES – FSIS SMALL PLANT HELP DESK

- Find answers to common questions from small and very small plant owners and operators across the country, or submit a question to the technical experts on the Small Plant Help Desk.
- [Small Plant Help Desk Form](#)
- [InfoSource@usda.gov](mailto:InfoSource@usda.gov), or call 1-877-FSIS-HELP (1-877-374-7435)



# ADDITIONAL RESOURCES – COMPLIANCE GUIDELINES

- FSIS has published a number of compliance guidelines [Significant Guidance](#).
- Commonly used as support in HACCP plans.
- Regulatory Safe Harbors.
- Must follow all critical operating parameters for support to be valid.

## Significant Guidance

This information is provided to comply with the OMB Bulletin on Agency Good Guidance Practices. The bulletin requires agencies to maintain a current electronic list of all "significant guidance documents" as defined in the Bulletin. See the Federal Register Notice published January 25, 2007 (72 FR 3432-3440).

Additional background information is available in the memoranda at: [MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS \(whitehouse.gov\)](#)

- [Expansion of the Use of the Term "Healthy"](#) (Mar 2020)
- [Compliance Guideline for Minimizing the Risk of Shiga Toxin-Producing \*Escherichia coli\* \(STEC\) in Raw Beef \(including Veal\) Processing Operations](#) (November 2017)
- ["At Least Equal To" Guidelines for State Meat and Poultry Cooperative Inspection Programs](#) (Nov 2016)
- [FSIS Compliance Guideline: Modernization of Poultry Slaughter Inspection Microbiological Sampling of Raw Poultry](#) (Jun 2015)
- [FSIS Compliance Guideline HACCP Systems Validation](#) (Apr 2015)
- [Compliance Guideline for Training Establishment Carcass Sorters in the New Poultry Inspection System](#) (Revised Sep 2014)
- [Compliance Guideline for \*E. coli\* O157:H7 Sampled and Tested Claims for Boneless Beef Manufacturing Trimmings \("Trim"\)](#) (Aug 2014)
- [Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing \*Escherichia coli\* \(STEC\) Organisms or Virulence Markers](#) (Aug 2014)
- [Pre-Harvest Management Controls and Intervention Options for Reducing \*Escherichia Coli\* O157:H7 Shedding in Cattle](#) (Aug 2014)
- [Compliance Guideline for Validating Cooking Instructions for Mechanically Tenderized Beef Products](#) (May 2015)
- [Compliance Guidelines for Use of Video or Other Electronic Monitoring or Recording Equipment in Federally Inspected Establishments](#) (Aug 2011)
- [FSIS Guidance for Evaluating Test Kit Performance](#) (Oct 2010)
- [Mobile Slaughter Unit Compliance Guide](#) (May 2010)
- [DRAFT Compliance Guideline for Controlling \*Salmonella\* and \*Campylobacter\* in Poultry, Fourth Edition, December 2015](#) (May 2010)
- [Supplementary Guidance on the Use of Antimicrobial Agents to Control \*Listeria Monocytogenes\* in Post-Lethality Exposed Ready-to-Eat Meat and Poultry Products](#) (Feb 2008)
- [Compliance Guidelines to Control \*Listeria monocytogenes\* In Post-Lethality Exposed Ready-To-Eat Meat and Poultry Products](#) (May 2006)
- [Compliance Guidelines for Establishments on the FSIS Microbiological Testing Program and Other Verification Activities for \*Escherichia coli\* O157:H7](#) (Apr 2004)



## ADDITIONAL RESOURCES – ASK FSIS

- askFSIS answers questions about meat, poultry, and egg products inspection; FSIS policies; and related topics from inspection personnel, industry, and other stakeholders.
- Submit a question on the web form [askFSIS](#).
- [Ask USDA](#): Find askFSIS public Q&As by including “askFSIS” in the search terms.

### askFSIS

Please note: Any information you provide on this form is voluntary. Please do not include any confidential information, social security numbers or birth dates in your comments. Please review our [Privacy Policy](#) for more information.

First Name *:	<input type="text"/>
Last Name *:	<input type="text"/>
Email *:	<input type="text" value="Enter a valid email address"/>
Phone Number *:	<input type="text" value="999-999-9999"/>
Subject *:	<input type="text"/>
Details/Question *:	<input type="text"/>
Inquiry Type *:	<input type="text" value="--None--"/>
Customer Type *:	<input type="text" value="--None--"/>
Policy Area *:	<input type="text" value="--None--"/>
Impacted Zip Code *:	<input type="text"/>
Country:	<input type="text" value="--None--"/>
Establishment Size:	<input type="text" value="--None--"/>
Establishment Number Prefix:	<input type="text" value="--None--"/>
Establishment Number:	<input type="text"/>



# ADDITIONAL RESOURCES – HACCP PLAN RESOURCES

- Small & Very Small Plant Guidance
  - HACCP Validation Resources.
  - Model plans are available for a number of HACCP categories.
  - These are models and must be adapted to your process and flow.
  - Own your HACCP system!

## Small & Very Small Plant Guidance

### Plain Language Resources

Find what you need in our guidebooks and educational materials. These resources are written for small and very small federal- and state-inspected establishment owners and operators who produce meat, poultry and egg products. Get help, in plain language, translating FSIS rules and regulations into daily operational practices.

### HACCP Models

The following updated HACCP guide and models and new Sanitation SOP guide reflect changes in FSIS policy and guidance since posting the previous versions at the beginning of HACCP implementation. The new guides and models include updated scientific references and footnotes containing explanatory guidance and links to related sources of information. Consistent with the previous models, each model includes a product description, ingredients list, production flow diagram, hazard analysis and HACCP plan.

Additional HACCP models will be posted as they are updated.

- [Guidebook for the Preparation of HACCP Plans](#) (Oct 2020)
- [Sanitation Standard Operating Procedures](#) (Oct 2020)
- [HACCP Model Non-Intact Fresh Ground Pork Sausage Patties](#) (Oct 2020)
- [HACCP Model Swine Slaughter Traditional](#) (Oct 2020)
- [HACCP Model NPIS Poultry Slaughter](#) (Oct 2020)
- [HACCP Model for Poultry Slaughter](#) (Nov 2020)
- [HACCP Model for the New Swine Inspection System \(pork slaughter\)](#) (Jun 2021)
- [HACCP Model for Bacon \(Heat-Treated, Not Fully Cooked\)](#) (Jun 2021)
- [HACCP Model for Raw Ground Beef \(Raw Non-Intact\)](#) (Jun 2021)
- [HACCP Model for Ready-to-Eat, Heat-Treated, Shelf-Stable \(Beef Jerky\)](#) (Jun 2021)
- [HACCP Model for Beef Slaughter](#) (Jul 2021)
- [HACCP Model for Thermally Processed, Commercially Sterile product](#) (Aug 2021)
- [HACCP Model for Raw, Non-Intact Turkey](#) (Oct 2021)
- [HACCP Model for Raw Intact Beef](#) (Dec 2021)
- [HACCP Model for Full Cooked-Not Shelf Stable Roast Beef](#) (Apr 2022)



# TRAINING OPPORTUNITIES

## Humane Handling Institute (UW-River Falls)

**Workshop 1:** Animal Welfare and Handling from Farm Through Transport

**Workshop 2:** Livestock Receiving and Lairage

**Workshop 3:** Effective and Humane Restraint and Stunning

**Workshop 4:** Stunning Equipment Operation and Maintenance

**Workshop 5:** Building a Robust Systematic Approach to Animal Welfare

### Upcoming Dates for Workshop 3

- February 1-2, 2024
- February 8-9, 2024
- February 15-16, 2024
- April 4-5, 2024
- April 11-12, 2024
- April 18-19, 2024

### Upcoming Dates for Workshop 5

- November 30-December 1, 2023
- December 7-8, 2023
- February 29-March 1, 2024
- March 7-8, 2024
- March 14-15, 2024
- May 2-3, 2024

[Humane Handling Institute](#)



# TRAINING OPPORTUNITIES



- UW-Madison Basic HACCP Training – May 29-30, 2024
- Request outreach and education sessions
  - EIAOs can provide outreach on regulatory requirements.
  - Veterinarians can provide outreach on humane handling.
  - Outreach is to provide information and answer questions, different from consulting, training, or writing plans.





# Questions?



## Bureau of Meat and Poultry Businesses

WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION (DATCP)