

In the need for uniformity of performance specific for this compilation of experienced ideas and emphasis on responsibilities has been has been written. Contents may change but not before you are notified in writing of the change. No time limit is set for making any changes.

GENERAL INFORMATION AND CONDUCT

There are many serious responsibilities you have assumed in your role as a Consumer Safety Inspector (CSI). Aside from the obvious role of protecting the consumer is your acceptance of a higher level of work and ethics. Your real role as CSI is to provide services that will, to the best of our abilities, assure compliance with certain directives and regulations that the company has agreed to follow in their written SSOP and HACCP program.

All of us are also bound by directive and regulation to certain criteria, as we accomplish this goal, that relates to how these services are provided. We are held accountable by the public and industry to perform these duties fairly and responsibly. This is an ethical lead in to instructions your are bound by, as an FSIS employee to perform. You need to learn your role as an online CSI or offline CSI and work within the guide lines for your role. We are anxious to help you know your role well, Equally, we are anxious to help you learn and elevate your position with FSIS as you desire.

You must understand the responsibility you accept when you stop the company's production processes by stopping the line. If a product that is going into the food supply has been directly contaminated and you can justify the production loss that will prevent its entrance into the food supply then you will be supported because that is in your scope of work. There must be verifiable reason and justifiable action for supervision to support your decision. Stopping the line to have the floor washed is not justifiable, it is not direct contamination to product, and it is a problem of intra - operational sanitation and offline CSI should be called to deal with that important problem. Stopping the line to have the viscera table washed and treated with 180-degree water is justifiable if there is gross contamination on the product contact surfaces. Continuing to stop production so that he floor in that same area can be washed is unjustifiable and cannot be supported. Production will be halted for need of an immediate safety concern. Use good judgment in dealing with this very important responsibility.

Stopping production for "possible" cross contamination from split saws and trachea removal is unjustifiable unless you can verify that there is direct product contamination. Verification is OBSERVATION of gross contaminate not SUSPECTED contaminate. This is the only criteria for justifying halting production. (Remember there are TWO final rail inspectors and the company has every opportunity to present that product to them for final inspection. Final Rail Inspection is the most critical part of postmortem inspection. You must rely on those inspectors to make the final judgment before it enters the food supply. Further, it is somewhat difficult to OBSERVE contamination from the head chain or viscera table. You lose credibility attempting make judgments from a distance. You should be busy enough with proper inspection of your own product that you could not have time to make that close of an inspection. It is also inappropriate to leave your position.

Talk among inspectors is fine. However excessive talking on the line may be distracting to proper performance of your procedures? Your line inspection procedures are a critical element of your performance evaluation. You must meet fully successful on your performance of procedures and the other critical element, which is postmortem decisions.

GS-5 and GS-7 should have very little to deal with the company directly other than pointing out trim defects, incidents of direct product contamination, rail out of carcasses with it's properly identified viscera for veterinary disposition and immediate safety concerns.

Proper presentation is important for the CSI to perform proper examination. You are justified to stop production if it is physically impossible for you to properly examine the product presented to you. That means, for example, that the tongue is on the hook backwards, or the paunches are upside down. That does not mean a paunch that is right side up but twisted only slightly, or the weasand and bung up underneath the paunch or intestine. That is going to happen occasionally and we can pull most of those organs out for proper examination without stopping production. If it is a consistent problem then and offline CSI should be notified to intervene in corrective actions. You may be accountable for the time the company has lost production if that lost production is not verifiable and the action not justifiable/

USDA sets examples for company. Such as:

- Sanitize hands and equipment upon entering the kill floor.
- Dip knives and scabbard at the end of the shift
- Use knives that don't rust (direct contact surface)
- Avoid confrontation with company employees

NO HORSE PLAY.

INK THROWING ON PRODUCT OR PEOPLE IS PROHIBITED. That includes inspectors leaving for other duty.

What is an excessive problem that requires notification of an offline inspector?

- A bloody heart every 30 minutes or ten in a row?
- Oil on carcasses - one in 15 minutes or 15 in a row?

Page # 2

Rail Inspection

Be sure your inspection decisions are verifiable and your disposition actions are justifiable.

-Oil on Trolleys-Notify Company to deal with immediately and Offline inspector for followup.

-Oil on product- any amount on the hocks is a minor AQL defect. It should be noted to company employee. An oil spot on the rounds or other parts of carcass less than 2 inches in diameter is also a minor AQL defect and can be trimmed on the moving line so point them out. If the oil spots are larger than 2 inches in diameter or are numerous then put on back rail for trim and notify company. The line should NOT be shut off for an oil problem. Your decision is whether the oil spots can be trimmed on line or offline. If repetitive, you should notify company AND Call for OFFLINE inspector for follow-up.

Not every AQL can be mentioned here so a supplemental sheet is being provided. On line inspectors do not perform AQL interventions but you should recognize them from the standpoint of minor, major, or critical and have a feel when for when offline interventions are needed. It is good B familiarization too. You need to know about tolerable limits of rail dust, hair, hide, grubs, etc.

Blood clots in thorax - If they are small (less than 2 inches) they are minor. If clots are 2-4 inches, have them removed on line. If clots are larger than 4 inches and in your judgment cannot be properly trimmed or removed on line, they should go to the back rail for company to clean up. If large clots appear repeatedly, you should notify the company AND call for an OFFLINE inspector.

-EVERY CARCASS must be looked at thoroughly. You cannot have your attention diverted by talking, spending too much time with individual trims (if they take that much time they probably need to be on back rail), or washing your hands that cause you to completely miss carcasses. The final rail is the last place on the kill floor that inspection has to see pathology. Palpation on the inside rail is a very important part of the inspection. You are required to palpate the external and internal iliac lymph nodes, the diaphragm, and the kidney, in addition to viewing the cavities and cut surfaces. This is a critical element in evaluation.

-Some of the peel outs are unnecessary. You must learn the difference in active and inactive (healed) pleural adhesions and pleuritis. If the lesions on the thoracic wall are red, yellow and are friable such that they will not easily peel off, the pleura may contain a layer of fat that gives them a thickened appearance and they may even have blood clinging to them, which, if you run your finger over them will scrape away and do NOT need to be peeled out. (Like the blood on the pericardial surface of the heart that give the first impression of pericarditis). If it wipes away or does not pull apart those pleura are inactive and sterile. You have to use good informed judgments, and these are criteria you can use. The reddish color of those healed tags and pleura occur at death due to diapedesis (that is red blood cells migrating through intact capillary vessels into healed or normal surrounding tissue). You have to get your hands in there to tell often times. If you still have questions the veterinarians or offline inspectors can correlate these with you.

"BUNK BRUISES" are hereby redefined. They are NOT bruises at all but degenerated fat in the brisket of no pathological significance. They occur from chronic trauma at the feed bunk much like a callous on the hand. They are sterile and do not involve surrounding tissue. They are not unwholesome. The company can trim those very nicely after chilling and they do not get into the food supply.

Bruises (contusions) are broken or damaged blood vessels in tissue such as muscle or fat following trauma that allows fluid to spread into the surrounding tissues. The fluid may consist of blood, serum, fibrin, and liquefied fat or degenerated muscle tissue. Bruises should be trimmed. If bruises are small they may be trimmed on line. Large bruises may need to be trimmed offline. We will be working with the company to recognize these cases on their own and put them out for appropriate trimming.

There is ZERO TOLERANCE of contamination from ingesta, feces, and milk on the carcass at presentation at the final rail. We will allow the company a chance to trim it off on the moving line unless it is so excessive, that it must be corrected with the line stopped. You are responsible for the time the line is off. Turning off the line must be justifiable and verifiable if we are to support your action. Remember, YOU are accountable for this very serious responsibility of stopping the company's production for the benefit of food safety. Be sure that supervisors can support your decision. Identifiable and verifiable ingesta or feces is as follows: a material of yellow, green, brown or dark color that has a fibrous nature. Milk is a cream colored to white fluid, not a clear fluid.

If you have unidentifiable material on the carcass and you are unsure what to do, you are instructed to apply a RETAIN/REJECT TAG on the leading side of the carcass. The carcass should be put on the back rail and have an offline inspector notified to verify and correlate with you on what the material is and how to make proper judgment on disposition. You should carry a clean supply of these tags with your initials on the top and bottom for correlation purposes. Keep the bottom portion for verification. This should take only a few seconds (if you are prepared) and may require the line to be only momentarily stopped to be sure it is done properly and that the company has time to deal with the rail out. The practice of stopping the line and having the company "push" the leading half of the carcass back behind the rail out junction is not justifiable. If the carcass gets by the rail out junction, simply make sure the "bug" is not applied, quickly put a RETAIN/REJECT tag on the leading side, and so that the company can be put the carcass on the rail out after the scale house for the offline inspector to deal with. It is unnecessary to cause significant loss of production. You don't have to decide what the unidentified material is, where it came from, or any remedy for correction. That is outside your scope of work. Offline inspectors will deal with that. They will correlate with you on nature of the material and how to deal with it in your part of the inspection process.

Page #4

VISCERA TABLE

-Open abscess - stamp out all related viscera. You can create lines before and after the contaminated viscera, but use only enough ink to alert downstream, so they can salvage EDIBLE PRODUCT without contaminating it. You must NOT THROW EXCESS INK. It gives an unprofessional appearance. It may be perceived as "horse play", not a practice of professional inspection. These are government stamps and unless stamps are used appropriately this practice can be called mislabeling of condemned product. You are given the responsibility of properly labeling product you determine is not safe for human consumption as U.S. CONDEMNED.

A contaminated liver needs one stamp for pet food salvage if it is otherwise healthy. If there is a single isolated abscess that can be removed, stamp the salvageable end and make a slice for the company to know how much of the liver they can have for pet food.

Contamination with small amounts of ingesta on the paunch and small intestine which are salvaged by the company, to be further processed to become edible does not always require condemnation. Feces contain a different flora than ingesta and are generally considered to be a source of more potential hazardous human health organisms. Product contaminated with feces should be condemned. The edible viscera such as the weasand and heart need to be stamped and condemned. A contaminated liver may be used for pet food. If you want time to observe the handling of the paunch and related stomachs and the small intestine, ask for an offine person to relieve you for a few minutes and go look. When they hang the rumen, omasum and abomasum, the ingesta contents literally cover the outside of these organs. If we had inspection there and continued to stamp out contaminated offal as is done on the table now, everything there would get stamped out. Those organs are far from edible until they have been emptied, double washed, and bleached in alkali. Then they are raw edible product that is ready to be cooked. The same goes for intestines. A leak that is isolated and not going to contaminate weasand, heart, or liver does not have to be stamped.

WE JUST NEED TO STAMP AND CONDEMN EDIBLE PRODUCT ON THE TABLE, NOT INEDIBLE for further processing unless the contamination is abscess, then inedible should be condemned too. A broken contaminated weasand, stamp is out- a heart that was dragged through ingesta or feces (some of which could be lifted over the contamination before it comes in contact) should be condemned. A lot of weasands are condemned for unrecognizable reasons. You still have the latitude to make a judgment about that as you do with all your disposition determinations, but it is unreasonable to get carried away.

Ingesta INSIDE the trachea is not contamination sufficient to stamp out the heart. As long as the ingesta is inside and not outside of the trachea, there is no reason to condemn the heart. When an inspector upstream from you has made that determination and turned that pluck over and did not stamp it, that inspectors judgment should not be over ridden and you should NOT STAMP OUT HIS PRODUCT!!! That should be the rule: INSPECT YOUR OWN PRODUCT. Stay with in your own scope of work.

Do your palpations both top and underside of lungs and both top and underside and renal impression of the liver. Palpate the RR junction.

If there are NO hepatic lymph nodes presented and NO OTHER PATHOLOGY. Do NOT stamp out the liver. It is still acceptable for human food.

Intact bladders still attached to the bung that are full of urine but not leaking are not contaminating anything and nothing needs to be condemned. The carcass IS NOT CONTAMINATED WITH URINE. How can it be? The urine is still in the bladder that has an intact bladder wall. The company does not need to trim that carcass. Leaking bladders are different because either you see the urine leaking out or you don't. Did that urine contaminate something? How much was it? The whole carcass? Other edible viscera (heart, liver, weasand)? Use good judgment

If a uterus with a calf has amniotic fluid draining out, the product it came in contact with should be handled like an open abscess. Stamp out the contaminated product, edible or not. If you think it has contaminated the carcass during evisceration, alert the company for trimming.

Page # 6