

Beef Sanitary Dressing Task Job Aid

Instructions: Review this Job Aid and policy documents, regulations, and inspection methodologies with a mentor.

Acronyms/Definitions

- NR – Noncompliance Record
- HACCP – Hazard Analysis and Critical Control Point
- SPS – Sanitation Performance Standards
- Sanitation SOP – Sanitation Standard Operating Procedure
- ZT – Zero Tolerance
- MOI – Memorandum of Interview
- Process Control Procedures – Procedures designed by an establishment to provide control of those operating conditions necessary for the production of safe, wholesome food. Typically includes:
 - Observing/measuring system performance.
 - Analyzing results generated.
 - Taking action when necessary to ensure the system continues to perform within control criteria.
- Sanitary Dressing – Practice of handling carcasses and parts by establishment employees and machinery, throughout the slaughter process, in a manner that produces a clean, safe, and wholesome product in a sanitary environment.
- **Note:** A principal objective of proper sanitary dressing and process control procedures is to reduce the potential for exposure of carcasses and parts to any food safety hazard during slaughter.

Task Overview

- IPP perform the Beef Sanitary Dressing task to verify:
 - Establishment compliance with SPS requirements during beef slaughter operations ([9 CFR 416.1 – 416.5](#)).
 - Establishment sanitary dressing and process control procedures are effective in preventing and controlling contamination throughout the beef slaughter process ([9 CFR 310.18\(a\)](#)). Contamination may occur from substances:
 - Inherent to the species being slaughtered (e.g., digestive tract contents).
 - Not inherent to the species being slaughtered (e.g., rail dust, rust).
 - Establishment use of decontamination and pathogen interventions (e.g., antimicrobial interventions) to address contamination that may occur during the slaughter process ([FSIS Directive 6410.1](#), Sec. X., B.).
- If the slaughter establishment uses sanitary dressing and process control procedures to support decisions in the hazard analysis, IPP verify the establishment's records support this decision ([9 CFR 417.5\(a\)\(1\)](#)).
- Failure to implement effective sanitary dressing procedures and maintain process control may result in insanitary conditions during beef slaughter and the production of adulterated product.

Basic Procedure

- Schedule the Beef Sanitary Dressing task in PHIS.
- Review any written sanitary dressing and process control procedures.
 - Establishment procedures may be part of the establishment's HACCP plan, Sanitation SOPs, Good Manufacturing Practices (GMPs), or other prerequisite programs.
- Review any records generated by the establishment's implementation and monitoring of its sanitary dressing and process control procedures.
 - Assess whether the records demonstrate that the program, as implemented, is effective and supports decisions made in the hazard analysis ([9 CFR 417.5\(a\)\(1\)](#)).
- Observe throughout the beef slaughter process, including:
 - Carcasses at various points on the slaughter line for evidence of frequent or recurring contamination.
 - Food contact surfaces and operation of establishment equipment. Verify the equipment is not routinely contributing to contamination of carcasses and parts.
 - Establishment employees to verify they are consistently preventing contamination and responding appropriately to remove contamination, when it occurs.
 - Establishment employees to verify they are implementing any procedures (e.g., GMPs) for preventing contamination.
 - Establishment's use of reconditioning, trimming, or pathogen (e.g., antimicrobial) interventions.
 - Locations in the process where FSIS or establishment procedures suggest increased contamination is occurring.

Note: Examples of potential contamination points and questions to consider when conducting verification activities under this task are in [FSIS Directive 6410.1](#), Sec. IX. C.

- When findings suggest the establishment has lost process control, determine whether the establishment has taken measures to bring the process back under control.
Examples of findings that may indicate a loss of control:
 - An increase in or cluster of contamination events.
 - Repeated or ongoing noncompliance related to contamination of carcasses with feces, milk, or ingesta at the final rail (i.e., ZT).
 - Evidence that contamination events are not being effectively prevented (e.g., online IPP are finding contamination more frequently than expected).
 - An increase in positive pathogen results (from FSIS or establishment testing).

Note: RCA may be warranted.

- Document findings.
 - Document compliance when the establishment is effectively maintaining sanitary conditions and process control during slaughter.
 - Document noncompliance when an insanitary condition has been created as the results of ineffective implementation of the sanitary dressing procedures. Cite [9 CFR 310.18\(a\)](#) and any SPS regulation that is appropriate to the situation.

- Consider if noncompliance is associated with other noncompliance or other findings (e.g., ZT failures, a trend/increase in pathogen positives).
 - If IPP identify an association, document the association in the Inspection Notes feature of PHIS.
 - Discuss the association with the establishment and document in the weekly meeting MOI.
 - Discuss the association with FSIS supervisors.
- **Note:** Evaluate incidental occurrences of contamination as they relate to the overall system to determine whether the establishment failed to prevent the creation of insanitary conditions. Isolated occurrences of contamination are not automatic evidence that the establishment failed to maintain sanitary conditions and process control during slaughter.
- Consider whether the overall pattern of inspection findings suggest that the establishment is not maintaining sanitary conditions throughout the slaughter HACCP system (e.g., repetitive HACCP or sanitation noncompliance for multiple aspects of the slaughter system).
 - This may indicate systemic problems with the slaughter HACCP system.
 - Discuss trends with FSIS supervisor.
- Complete the inspection task in PHIS.

Discussion Points

- Discuss how IPP distinguish a failure to maintain sanitary conditions and process control during slaughter versus incidental occurrences of contamination.
- Discuss what types of sanitary dressing related findings may indicate an establishment's beef slaughter process is not under control.

Knowledge Check

- Explain why effective sanitary dressing and process control procedures are important during beef slaughter.

Resources

- [FSIS Directive 6410.1](#) – *Verifying Sanitary Dressing and Process Control Procedures in Slaughter Operations of Cattle of Any Age*
- IM Workbook – Sanitary Dressing