

# Meat Inspection and Related Topics

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# Who Am I?

- Born in Lawrence, KS
- Kansas State University
  - Bachelors in Biology w/ an Animal Science Minor – 2004
  - Doctor of Veterinary Medicine – 2008
- University of Texas Health Science Center at Houston
  - Masters in Public Health – 2013
- US Army Veterinary Corps
  - Commissioned April 16, 2005
  - Active Duty 2008-2011
  - Currently a Reservist
- Texas Meat Safety Assurance
  - Hired July 27, 2013 – Assistant Director
  - Promoted February 1, 2016 – Director
- National Association of State Meat and Food Inspection Directors (NASMFID)
  - Current President



# Meat Inspection Basics

- Federal Laws
  - Federal Meat Inspection Act
  - Poultry Products Inspection Act
  - Humane Slaughter Act
- Federal Regulations
  - Code of Federal Regulations (CFR)
    - 9 CFR 416 – Sanitation
    - 9 CFR 417 – HACCP
- Federal Issuances (not regulatory)
  - Directives – Valid until rescinded
  - Notices – Valid for 1 year from publication
- State Laws
  - Texas Meat and Poultry Inspection Act
- State Regulations
  - Texas Administrative Code
- State Issuances (not regulatory)
  - Directives – Valid until rescinded
  - Notices – Valid for 1 year from publication (depends on state)



# Meat Inspection Basics

- Why is meat inspection important?
  - Food Safety
    - The CDC estimates that 1 in 6 Americans (48 million people) become ill with a foodborne illness each year. Approximately 128,000 are hospitalized each year and approximately 3,000 Americans lose their lives to foodborne illness each year.
    - The USDA estimates that foodborne illness costs Americans \$15.6 billion each year.
  - Industry protection
    - Foodborne Illness outbreaks have an effect on consumer confidence. This directly relates to demand and prices across the industry.
    - By meeting certain requirements and verifying those requirements are met through inspection we protect our ability to sell meat and poultry products in international markets.
    - By verifying the humane treatment and slaughter of animals through inspection, we protect the industry from false claims made by individuals and groups hostile to the livestock industry.
  - Consumer Protection
    - By verifying that products are truthfully labeled we protect the consumer from falling victim to false or misleading label claims. This verification also helps ensure fair play in the marketplace.



# Meat Inspection Basics

- Sanitation Performance Standards (SPS)
  - A set of regulatory requirements for the construction and maintenance of a premises where meat and/or poultry are slaughtered and/or processed.
    - Easily cleanable surfaces, impervious to moisture, excludes pests, etc
    - Does not involve food contact surfaces
- Sanitation Standard Operating Procedures (SSOP)
  - A set of regulatory requirements for the maintenance of sanitation in a facility where meat and/or poultry are slaughtered and/or processed.
    - Must be written and monitored
    - Focused on food contact surfaces



# Meat Inspection Basics

- Hazard Analysis and Critical Control Points (HACCP)
  - A written plan that begins with an analysis of hazards (biological, chemical, physical) and identifies critical points in the process for controlling those hazards within critical limits. Those points are monitored and recorded. Any deviations result in corrective actions that are also recorded. All HACCP plans must be backed by supporting documentation
- Humane Handling
  - All livestock must be handled and slaughtered in a humane manner. Stunning is a critical component of humane handling and missed stuns are the most frequent noncompliances with humane handling requirements.
    - Not required to be written, but a written Robust Systematic Approach is encouraged.



# Meat Inspection Basics

- Grant of Inspection
  - Allows production of meat and poultry products under inspection for entry into wholesale commerce.
    - Requires SPS, SSOP, HACCP, and Humane Handling if slaughtering
- Custom Exemption
  - Allows slaughter and/or processing of a privately owned animal for a customer, but does not allow entry of that product into commerce. Animal remains owned by the customer so product is not sold, only the service. All product must remain identified by the owner's name and marked as "NOT FOR SALE" throughout the process and when the product is delivered to the customer.
    - Requires SPS, SSOP, and Humane Handling if slaughtering
- Retail Exemption
  - Allows retail sale of meat and poultry products directly to the consumer. All source material must be from an inspected source. No slaughter occurs under a retail exemption. No participation in wholesale commerce is allowed (except limited sale to Hotels Restaurants and Institutions – about \$80,000/year).
    - Requires compliance with state and/or local regulations based on FDA requirements. Also requires grinding logs.



# State vs Federal Inspection

- Federal Inspection
  - Overseen by US Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS)
  - Products produced under federal inspection are able to participate in intrastate, interstate, and international commerce.
  - Policies may in some cases be based on the need to inspect very large plants.
- State Inspection
  - Overseen by the respective state program
  - Currently 27 states have state programs
  - Products produced under state inspection are only able to participate in intrastate commerce.
  - Policies focused on smaller businesses.
  - State programs are audited annually by FSIS with an onsite audit every 3 years.





# State Programs – Important Terminology

- “SAME AS”
  - This means that inspection must be conducted exactly the way FSIS would conduct it. No leeway is granted to “outside the box” ideas that accomplish food safety goals in a better way for a small business. All interpretations of law, regulation, and policy must mirror FSIS in every way.
- “AT LEAST EQUAL TO”
  - This means that inspection is conducted in a manner that ensures accomplishment of food safety objectives but may allow for flexibility in implementation of “outside the box” strategies that can be a better fit for small businesses. Interpretations of law, regulation, and policy may be somewhat different than FSIS (but may be subject to justification to FSIS).
- “EQUIVALENT”
  - This term describes the standards that foreign businesses are required to meet to import meat and poultry products into the United States.  
\*\*\*Notice they are not held to a “SAME AS” standard to participate in interstate commerce\*\*\*



# Talmage-Aiken and Cooperative Interstate Shippers Programs

- There are two programs that exist where state inspectors provide inspection for products that are allowed to enter interstate commerce.
  - Talmage-Aiken (TA)
    - The establishment is technically a federally inspected establishment
    - The inspector must inspect in a “SAME AS” manner
      - Thus there is no real benefit to the establishment
    - The state provides 50% of the funding, FSIS provides 50% of the funding
      - Except Overtime which is 100% supported by FSIS and billed by FSIS to the establishment
  - Cooperative Interstate Shippers (CIS)
    - The inspector must inspect in a “SAME AS” manner
      - Thus there is no real benefit to the establishment
    - The state provides 40% of the funding, FSIS provides 60% of the funding



# Why Choose State Inspection

- A program focused on small business
- Inspection staff that is part of your community
- A food safety focus coupled with a desire to see your business succeed
- While basic inspection requirements will be largely the same between state inspection and FSIS inspection, state programs may have more flexibility to look at the unique situation of your business when evaluating how your establishment accomplishes food safety goals and meets regulatory requirements.



# Current Events

- COVID-19 has caused slowdowns and shutdowns at several large packing plants nationwide. This has led to serious problems in supply chain management in all phases of the livestock industry.
- The unique challenges we are currently facing highlight weaknesses in our current system which relies on very large packing plants for the vast majority of processing capacity.
- Various solutions have been proposed but the unfortunate reality is that there are not many quick fix type answers because the production capacity at smaller facilities is not big enough today to pick up the slack.



# Proposed Solutions

- Allow Custom Exempt processors to enter product into commerce on a temporary basis.
  - This course of action presents a significant risk for food safety (and negative industry impact) and is highly unlikely to be accepted by FSIS.
  - Many Custom Exempt processors are already booked out for several months. Therefore this course of action may not relieve supply chain issues substantially even if allowed.
- The PRIME Act
  - This Act essentially removes the requirement for inspection for entry of meat products into commerce.
  - This course of action presents a significant risk to food safety, consumer confidence and perception of meat as safe to eat, and potentially international trade issues.



# Solution For The Future

- Expanding Markets for State-Inspected Meat Processors Act of 2020
  - Introduced by House Republican Conference Chair and Wyoming Congresswoman Liz Cheney (R-WY)
    - Co-sponsored by Rep. David McKinley (R-WV) and Rep. Carol Miller (R-WV)
    - <https://cheney.house.gov/2020/06/12/cheney-introduces-bill-to-open-new-markets-for-state-inspected-meat/>
- New Markets for State-Inspected Meat and Poultry Act
  - Introduced by U.S. Sens. Mike Rounds (R-S.D.) and Angus King (I-Maine)
    - [https://www.rounds.senate.gov/newsroom/press-releases/rounds-king-reintroduce-bill-to-allow-local-meat-and-poultry-products-to-be-sold-across-state-lines?utm\\_source=House+GOP+Media+List&utm\\_campaign=fa002e068c-EMAIL\\_CAMPAIGN\\_2019\\_01\\_03\\_06\\_14\\_COPY\\_01&utm\\_medium=email&utm\\_term=0\\_38d91d4596-fa002e068c-](https://www.rounds.senate.gov/newsroom/press-releases/rounds-king-reintroduce-bill-to-allow-local-meat-and-poultry-products-to-be-sold-across-state-lines?utm_source=House+GOP+Media+List&utm_campaign=fa002e068c-EMAIL_CAMPAIGN_2019_01_03_06_14_COPY_01&utm_medium=email&utm_term=0_38d91d4596-fa002e068c-)
  - Information Sheet
    - [https://www.rounds.senate.gov/imo/media/doc/Two-Pager%20The%20New%20Markets%20for%20State-Inspected%20Meat%20Act%20\(002\).pdf](https://www.rounds.senate.gov/imo/media/doc/Two-Pager%20The%20New%20Markets%20for%20State-Inspected%20Meat%20Act%20(002).pdf)



# The Possible Future

- I would love to see a future where there is a proliferation of small to medium sized slaughter and processing plants across the country.
  - Shorter transport distance/time/cost
  - Competitive prices
- Niche products for niche markets
  - Many consumers are interested in obtaining locally sourced products
  - Private labels
  - Label claims that really mean something
  - Take small businesses out of direct competition with huge packers by offering a premium product
- Grading services
  - No states are currently offering grading services, but I think it might be valuable in the future.



# Closing

- Changes may be needed to avoid the vulnerabilities that COVID-19 has revealed in our meat industry.
- The best way to insulate the meat industry from these vulnerabilities may be a proliferation of small to medium sized slaughter businesses that provide an alternative outlet for ranchers.
- State programs want to see small businesses in their state succeed!
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