



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Office of Field
Operations

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April 19, 2012

Valley Meats, Est. 07299M/P
3845 Cedarvale
Roswell, NM 88203
Second Walkthrough Exit Meeting

Meeting Date and Time: April 19, 2012, 1405 hours MDT

FSIS Attendees: Ms. [REDACTED] Albuquerque Frontline Supervisor (FLS)
Dr. [REDACTED] Supervisory Public Health Veterinarian (SPHV), Inspector
In Charge

Company Attendees: Mr. Rick De Los Santos, Owner
Mrs. Sarah De Los Santos, Accounting
Mr. [REDACTED]
Mr. [REDACTED]

At approximately 1405 hours MDT, FLS [REDACTED] announced she would review findings of the basic compliance assessment of the facility. FLS [REDACTED] explained she would read which compliance items were indicated as not met from each checklist; SSOP, HACCP, and E. coli testing.

From the "Sanitation SOP - Basic Compliance Checklist", FLS [REDACTED] read aloud the following:

- Sanitation SOP's: The establishment does not have written Sanitation SOPs that describe the procedures the establishment conducts daily to prevent direct contamination or adulteration of product, regulation 416.2(a).
- Recordkeeping: The establishment does not have identified records, that on a daily basis, document implementation and monitoring of SSOPs. Regulation 416.16(a).

From the "HACCP Systems Basic Compliance Checklist", FLS [REDACTED] read aloud the following:

- Hazard Analysis and HACCP Plan Development: initial hazard analysis 417.2(a)
 - The establishment has not conducted or had a hazard analysis conducted for it.
 - The hazard analysis does not include food safety hazards that are reasonably likely to occur in the production process, or
 - Does not identify the preventive measures the establishment can apply to those food safety hazards.
 - The hazard analysis does not include a flow chart that describes (diagrams) each process and product flow in the establishment.

- The hazard analysis does not identify the intended use or consumers of the finished products.
- Initial Plan Development, regulations 417.2(c)(4), 417.3(a)(2), and 417.4(a)(1)
 - The establishment has not conducted validation activities to determine that the HACCP plan would function as intended.
 - The establishment's records do not include multiple results that verify monitoring of CCPs and conformance with critical limits.
- Multiple Products, a HACCP plan covers more than one product and the products are not all within one on the nine processing category as defined in 417.2(b)(1) and 417.2(b)(2).
- Food Safety Hazard (s), the HACCP plan does not list the food safety hazards identified in the hazard analysis, regulation 417.2(c)(1).
- Hazard Control, the HACCP plan does not list critical limits to be met at each CCP, regulation 417.2(c)(3).
- Verification procedures, the HACCP plan does not list the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequency with which these procedures will be performed, regulation 417.2(c)(7).

At this time, Mr. [REDACTED] interjected to ask if the company could be provided with copies of the basic compliance checklists as a lot of information was being read and the company did not want to miss anything. FLS [REDACTED] reported she could repeat the information as many times as the company needed. SPHV [REDACTED] explained the checklists are sent to the Denver District Office (DO) and the company would need to ask the DO if copies could be made. Mr. [REDACTED] asked if copies are usually provided and FLS [REDACTED] reported she had never provided copies to establishments. Mr. [REDACTED] asked if the company could record the meeting and SPHV [REDACTED] reported that USDA does not record any conversations with establishments. FLS [REDACTED] stated she would finish reading the items which failed to meet compliance as only the E. coli testing checklist remained.

From the "E. coli Testing Basic Compliance Checklist", FLS [REDACTED] read aloud:

- Sampling procedures, the establishment's procedures do not address:
 - The locations of sampling, covered under regulation 310.25
 - Handling of samples to ensure sample integrity.

FLS [REDACTED] provided Mr. Rick De Los Santos with a printed copy of 310.25 from the electronic 9 CFR and explained the areas not meeting compliance regarding E. coli testing were covered in 9 CFR 325.10. FLS [REDACTED] reported that she had finished reading all of the checklists and Mr. [REDACTED] requested FLS [REDACTED] repeat each checklist again. FLS [REDACTED] reported she would begin by reading the E. coli checklist and move from shortest to longest.

From the "E. coli Testing Basic Compliance Checklist", FLS [REDACTED] read aloud:

- Sampling procedures, the establishment's procedures do not address:
 - The locations of sampling, covered under regulation 310.25
 - Handling of samples to ensure sample integrity.

From the "Sanitation SOP - Basic Compliance Checklist", FLS [REDACTED] read aloud the following:

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- The establishment does not have written Sanitation SOPs that describe the procedures the establishment conducts daily to prevent direct contamination or adulteration of product, regulation 416.2(a).
- Recordkeeping: The establishment does not have identified records, that on a daily basis, document implementation and monitoring of SSOPs, regulation 416.16(a).

From the "HACCP Systems Basic Compliance Checklist", FLS [REDACTED] read aloud the following:

- Hazard Analysis and HACCP Plan Development: initial hazard analysis 417.2(a)
 - The establishment has not conducted or had a hazard analysis conducted for it.

At this time, Mr. Rick De Los Santos interjected to question this regulation. FLS [REDACTED] stated that not meeting compliance simply meant the regulation was not met, not necessarily that the company did not address the regulation at all. SPHV [REDACTED] explained to be considered to meet compliance, one hundred percent (100%) of the regulation must be satisfied. SPHV [REDACTED] advised the company to keep this 100% concept in mind when listening to FLS [REDACTED] read from the checklists. FLS [REDACTED] continued reading aloud as follows:

- The hazard analysis does not include food safety hazards that are reasonably likely to occur in the production process, or
- Does not identify the preventive measures the establishment can apply to those food safety hazards.
- The hazard analysis does not include a flow chart that describes (diagrams) that describes each process and product flow in the establishment.
- The hazard analysis does not identify the intended use or consumers of the finished products.
- Initial Plan Development, regulations 417.2(c)(4), 417.3(a)(2), and 417.4(a)(1)
 - The establishment has not conducted validation activities to determine that the HACCP plan would function as intended.
 - The establishment's records do not include multiple results that verify monitoring of CCPs and conformance with critical limits.
- Multiple Products, a HACCP plan covers more than one product and the products are not all within one on the nine processing category as defined in 417.2(b)(1) and 417.2(b)(2).
- Food Safety Hazard (s), the HACCP plan does not list the food safety hazards identified in the hazard analysis, regulation 417.2(c)(1).
- Hazard Control, the HACCP plan does not list critical limits to be met at each CCP, regulation 417.2(c)(3).
- Verification procedures, the HACCP plan does not list the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequency with which these procedures will be performed., regulation 417.2(c)(7).

At this time, FLS [REDACTED] reported she had re-read all of the items not meeting compliance on the checklists and asked if she should read the documents again. Mr. De Los Santos stated the company had recorded the regulations from the checklists and inquired about the facility. FLS [REDACTED] read from her "Front Line Supervisors On-Site Visit Checklist" document the walls, floors, ceilings and doors do not comply with regulations and the lighting was observed as

inadequate in some areas. Mr. [REDACTED] asked if the pen areas were acceptable. SPHV [REDACTED] asked Mr. [REDACTED] which outside areas he was referring to. Mr. [REDACTED] clarified he was referring to all areas from the time the animal arrives to knocking. FLS [REDACTED] reported that not all areas outside met compliance. Mr. [REDACTED] asked what areas and SPHV [REDACTED] reported that FLS [REDACTED] will report the facts and observations to DO. The DO determines whether to comment specifically. Mr. [REDACTED] then asked who the company can contact to find out what they need to do. SPHV [REDACTED] explained the agency will not and does not tell a company what they need to do, the company must assess where compliance is not being met and make adjustments to come under compliance. SPHV [REDACTED] advised the company to contact the DO for further comments on the observations. Mr. Rick De Los Santos asked who in the agency or government the company could contact for help and answers to questions. FLS [REDACTED] informed Mr. De Los Santos the company can check the regulations and also contact the DO for suggestions of other resources. Mr. De Los Santos asked who should be contacted in the DO; Ms. Anna Gallegos (Denver Deputy District Manager) and FLS [REDACTED] confirmed Ms. Gallegos. FLS [REDACTED] suggested Mr. De Los Santos consult the equine partners on HACCP programs.

Mrs. Sarah De Los Santos asked where the regulations could be found and SPHV [REDACTED] advised Mrs. De Los Santos to type "9 CFR" into the Google search engine. Mrs. De Los Santos did so and reported she was not receiving clear direct links. SPHV [REDACTED] moved behind the office desk and Mrs. De Los Santos to assist in locating a printable electronic 9 CFR. SPHV [REDACTED] and Mrs. De Los Santos located an electronic 9 CFR Mrs. De Los Santos reported was useable and Mrs. De Los Santos then saved the URL address in "Favorites".

While SPHV [REDACTED] was assisting Mrs. De Los Santos, Mr. De Los Santos was discussing with FLS [REDACTED] the general vagueness of the findings of the second walk through. FLS [REDACTED] informed Mr. De Los Santos that the reason the second walkthrough was vague because whenever HACCP was first implemented a lot of establishments were complaining to the Food Safety Inspection Service that the Agency was telling the establishments exactly what to do and the establishments did not like being told exactly what they can and cannot do when it comes to their facilities and HACCP programs. FLS [REDACTED] explained that the Agency does not tell the establishment what they need to do, the establishment must assess where compliance is not being met and make adjustments to come under compliance.

The meeting closed at 1430 hours MDT.

Copies to:

Mr. Rick De Los Santos, Owner
 Ms. [REDACTED] FLS
 Dr. [REDACTED] SPHV/IIC
 Ms. Anna Gallegos, Denver DDM