Wagner, Scott - FSIS

From: Gilmore, Keith - FSIS
Sent: Monday, June 25, 2012 9:50 AM
To: Gallegos, Anna - FSIS
Cc: Nelson, Ron - FSIS; Reeder, Robert - FSIS; Wagner, Scott - FSIS; [redacted] - FSIS
Subject: RE: Drug Residue Program

Based on the information from PDD, it appears that we would move forward with doing a conditional grant once FSIS labs have developed and validated their testing procedures. Not sure when that will happen though. Apparently there has been another ban on horse slaughter funding put in the newest Farm Bill that has yet to be voted on and passed.

As for Valley Meats, we need to continue with our position as stated previously...we won't be approving any grants for equine slaughter until FSIS labs have developed and validated drug testing methodologies for equines, which could still be a significant time.

From: Gallegos, Anna - FSIS
Sent: Monday, June 25, 2012 10:32 AM
To: Gilmore, Keith - FSIS
Cc: Nelson, Ron - FSIS; Reeder, Robert - FSIS; Wagner, Scott - FSIS; [redacted] - FSIS
Subject: FW: Drug Residue Program

Good morning Dr. Gilmore:

Below please find the information we received back from PDD for the horse slaughter residue program provided by Valley Meats, Est. 7299 in Roswell, NM. They are the firm with plans to slaughter horses. FLS [redacted] did a walkthrough and a basic compliance check for the HACCP/SSOP plans and I believe they are good to go. The only thing we have left is a yes or no for the residue program.

Thanks,

Anna Gallegos

Deputy District Manager

U.S. Department of Agriculture

Denver District

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~The job gives you the authority; your performance gets you the respect~*Irwin Federman*

message in error, please notify the sender and delete the email immediately."

From: Wagner, Scott - FSIS
Sent: Friday, June 22, 2012 1:29 PM
To: Nelson, Ron - FSIS
Cc: Reeder, Robert - FSIS; Gallegos, Anna - FSIS
Subject: FW: Drug Residue Program

FYI

Scott T Wagner, DVM
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From: Seebohm, Scott - FSIS
Sent: Friday, June 22, 2012 12:22 PM
To: Wagner, Scott - FSIS
Cc: Hulsey, Laura - FSIS; Arnold, Ilene - FSIS; Seebohm, Scott - FSIS; Holterman, James - FSIS
Subject: FW: Drug Residue Program

Dr. Wagner,

Here is the response Dr. Holterman sent to Mr. and Mrs. De Los Santos regarding their proposed residue control program for equine slaughter. As Dr. Holterman points out, this proposed residue control program follows FSIS recommendations from the Residue Prevention Compliance Guide. Though the focus of the compliance guide is primarily dairy cattle and veal calves, it seems like the same kinds of control measures would be a reasonable initial approach to supporting the decisions regarding chemical residues in horse slaughter. As you know, FSIS does not "approve" establishment food safety programs prior to granting inspection, but it is important that you have a reasonable belief that the establishment has made supportable decisions and can implement controls to prevent hazards from occurring in the products they will produce. Of course, the 90-day conditional grant affords the establishment the opportunity to demonstrate to us that their food safety system does work under operating conditions. FSIS also performs various activities to verify the implementation and effectiveness of an establishment's food safety system.

I see no reason, based on this submission, to withhold a grant of inspection. Though I qualify that assessment with the following assumptions:

1. That the establishment will consider any new information that becomes available regarding the risk of chemical residues in their supply of horses for slaughter, either pertaining to specific suppliers or to their supply of horses in general and reassess their decisions appropriately in response to that information.
2. That the establishment will verify the effectiveness of these control measures under operating conditions to provide assurance that they do, in fact, achieve the desired goal.
3. That FSIS has no specific information at this time, or does not become aware of information in the future, to indicate that the proposed control program will be ineffective. We may not be 100% certain that the proposed controls will be absolutely effective at preventing all chemical residues in the establishment's products, but we need to consider whether the program prevents the chemical residue hazard from being reasonably likely to

occur. In the absence of information to indicate that the establishment controls will not work or are not working, we have to assess whether the decisions are reasonably likely to be effective, not that they are absolutely effective.

4. That FSIS upper management or USDA management does not determine that the control methods recommended in the residue compliance guide are insufficient for equine slaughter based on information about the horse industry and likely residue presence in slaughtered horses.

It is also important to note that this evaluation is based solely on domestic policies related to granting of inspection. We do not, at this time, know whether or when FSIS might reach agreement with the European Union or other trading partners on export of horse products. We also cannot comment on what conditions our trading partners might place on horse products that would go beyond the FSIS requirements. The proposed control measures may not be sufficient to achieve eligibility to export horse products.

Scott Seebohm, DVM
Deputy Director
Policy Development Division
USDA-Food Safety and Inspection Service
Omaha, NE
(402) 344-5052

From: Holterman, James - FSIS
Sent: Friday, May 18, 2012 10:08 AM
To: [redacted]@yahoo.com; [redacted]@yahoo.com
Cc: Hulsey, Laura - FSIS; Seebohm, Scott - FSIS; Arnold, Ilene - FSIS; Holterman, James - FSIS
Subject: FW: Drug Residue Program

Mr. and Mrs. De Los Santos,

I have reviewed your drug residue program and have the following comments:

This program very closely follows the recommendations of the Residue Prevention Compliance Guide 2012 for its controls. There is one recommendation I will make on the steps you will need to take if FSIS finds a violative residue. Since you have determined that residues are not reasonably likely to occur (NRLTO), a violative residue finding should be followed with all 4 steps of the corrective actions of 9 CFR 417.3 (b). All inspector generated sampled carcasses should be retained by FSIS so 9 CFR 417.3 (b) (1-3) should be done by FSIS in these cases. When there is a scheduled sample FSIS will recommend that the establishment hold the sampled carcass until the results are returned and in this case you will be responsible for 9 CFR 417.3 (b) (1-3). However, in all cases of violative residue findings, the reassessment under 9 CFR 417.3 (b) (4) should be performed.

I have added additional comments/questions to your program below in red that are not necessarily requirements but can add support to your program.

575-622-1214

DRUG RESIDUE PROGRAM

Signature_____Date_____

Please remember that the acceptability of this program is made by your District Office.

Jim Holterman, D.V.M
Staff Officer
USDA, FSIS, Policy Development Division
Omaha, NE 68102