

Date: March 28, 2013

RE: Review at Responsible Transportation LLC

Reviewers: EIAOs [REDACTED] & [REDACTED]

Documents included for Review: HACCP plans (Slaughter and Processing) and SSOPs

Disclaimer: Only the written plan that was submitted was reviewed (no supporting documentation, decision-making documents, or documents supporting the monitoring and verification procedures were reviewed). The documents reviewed were reviewed from the perspective of meeting current regulatory requirements and comments should be viewed in that light. Since these plans have not been implemented yet, it is up to the establishment to ensure that regulatory requirements are met once it is implemented.

Comments from Review

The establishment is preparing for start up and requested a visit from Dr. [REDACTED] FLS. EIAOs [REDACTED] and [REDACTED] were instructed to accompany him and complete a preliminary review of their food safety programs. The equine slaughter and processing plans with the SSOP were presented for review. At 1000 we met with CFO Chase Greiner, Keaton Walker, and Travis Y. There were various items discussed including:

1. Slaughter HACCP plan hazards identified. [REDACTED]
[REDACTED] The definition of a physical hazard was shared with the FDA resource referred to as a possible guide for their use. Pathogens identified were [REDACTED] Discussed was how they had selected those as biological hazards and the support expected for the CCPs determined for these hazards. They do have three CCPs in the plan [REDACTED]
[REDACTED] After discussion, [REDACTED] stated he planned to change the pathogens to [REDACTED]. Their decision making related to residues was discussed. Their hazard analysis uses the USDA residue testing results as the support for the hazard being not likely to occur. The establishment plans to look at and possibly use information concerning residues in equine products from Canada. There was one step with no answer at the question "if this is a CCP at that step" which was pointed out. The verification activities were found to be not specific in describing how monitoring would be done. The establishment stated this is being developed. In addition the antimicrobial spraying, especially since [REDACTED] [REDACTED] would need additional details including coverage requirements. The chemical used for the antimicrobial is being chosen. It was shared that they would be required to have supporting documentation related to parameters needed for its effective use. Also explained was the need to monitor and verify at increased levels to generate a plant history prior to going to the frequencies they had chosen.

2. The Processing HACCP plan was reviewed and found to state the CCP was [REDACTED]. The plant plans to [REDACTED]. Later plans include [REDACTED] however this will be at a latter time. We discussed the reasoning for an [REDACTED] verses external product temperature for raw intact product with the establishment determining this would be an improvement to use surface temperature. Then we discussed the food safety aspects related to [REDACTED].

[REDACTED]. The establishment personnel stated they planned to make changes and [REDACTED] as a prerequisite program.

3. The SSOPs were reviewed. The monitoring for operational sanitation had an ambiguous frequency statement so it was suggested this be clarified. The preoperational monitoring was described as [REDACTED]. Earlier we had discussed the sanitation requirements related to [REDACTED]. They were informed that we would not consider [REDACTED].

We did a walk through of the facility with most areas found to have active construction going on. FLS [REDACTED] did state they had made significant progress since his last visit. We ended with a short discussion of the final review process needed for the food safety plans and the facility.