Simmons, Liz - FSIS

From: Trout, Bryan - FSIS
Sent: Friday, June 07, 2013 8:44 AM
To: Thompson, Eric - FSIS
Cc: Bane, Robert - FSIS; Kiecker, Paul - FSIS; Cornett, Julie - FSIS; Trout, Bryan - FSIS; Clarkson, Robert - FSIS
Subject: Rain's Natural

Good Morning Eric,

On Thursday June 6th , I visited Rain's Natural Meats in Gallatin, MO to review their Equine Slaughter plan. Upon review, I believe this program meets regulatory requirements. The establishment's plan is based on and supported by science and if implemented correctly should provide for food safety. The establishment has conducted a hazard analysis and determined the hazards that are reasonable likely to occur. In this case, they have identified pathogens (Salmonella) as the pathogen of concern. They have three critical control points to control this hazard that are typical of a slaughter process. They are: [redacted] They have sufficient supporting documentation for each of these CCPs. However, the effects of the water application with respect to Salmonella are studies that were performed on beef carcasses. The establishment's consultant has indicated that his literature search did not find scientific studies in peer reviewed journals on the antimicrobial effects of hot water against pathogen on equine carcasses. Since the studies on beef carcasses do show a 2-3 log reduction in Salmonella and beef and equine carcass qualities are pretty similar, it is my opinion that this would be sufficient as support for their intervention. It would be recommended that the establishment validate this intervention to show it functions as intended when their grant is received.

The establishment has developed recall procedures to comply with 9 CFR 418.3.

The establishment has determined that drug residues are not reasonably likely to occur due to their residue avoidance program. This program has been previously detailed, but it involves only buying horses from members of their equine quality assurance group. The horses purchased by this group will be maintained for at least 45 days prior to slaughter to ensure that no drugs are administered. The group member will sign an affidavit indicating that the horse is free of drugs. The establishment will blood test each horse at slaughter and have that sample analyzed for ivermectin and phenylbutazone levels. The establishment still intends to conduct a study to correlate blood levels and tissue levels of these compounds.

The establishment has developed: CCPs, Critical Limits, monitoring, verification, corrective actions and recordkeeping procedures to comply with 9 CFR 417.2(c)(1-7). They have support for decisions made in their hazard analysis and have support for their chosen monitoring/verification procedures and frequencies to comply with 9 CFR 417.5(a)(1-2).

The establishment's SSOPs are in place and describe pre-operational inspection cleaning and inspection procedures and they have operational sanitation procedures to protect product from direct adulteration/contamination during processing. They have developed suitable records to record the results of their SSOPs findings. The requirements of 416.12(a-d) and 416.16 have been met.

If you have any questions, please contact me.

Respectfully submitted,
Bryan Trout, D.V.M.
Supervisory Enforcement Investigations and Analysis Officer
Springdale District
USDA/FSIS
785-806-5842 Blackberry