

Simmons, Liz - FSIS

From: Thompson, Eric - FSIS
Sent: Friday, June 07, 2013 4:17 PM
To: Gilmore, Keith - FSIS
Cc: Kiecker, Paul - FSIS; Cornett, Julie - FSIS; Trout, Bryan - FSIS; Clarkson, Robert - FSIS; Bane, Robert - FSIS
Subject: Rains Natural Meats Gallatin MO, update

Good Afternoon Dr. Gilmore,

Dr. Clarkson (FLS) and Dr. Trout (SEIAO) performed a "final" walkthrough at Rains Natural Meats in Gallatin, MO on Thursday, 06-06-2013. Attached is the report from Dr. Clarkson, and below is the report from Dr. Trout. In short, they both support a recommendation to forward the grant application through the process with the one hold up, appropriate certification from the MO Department of Natural Resources, Water Protection Program to meet the requirements of 9 CFR 304.2. This document will be faxed to the Springdale DO upon receipt by Mr. Rains and I will let you know as soon as we have it and it checks out with the MO DNR WPP. That is all.

FROM DR. TROUT:

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.

FROM DR. CLARKSON:



Est 20575 Rains
Grant Reccome...

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U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE RECOMMENDATION ON APPLICATION FOR INSPECTION	1. ESTABLISHMENT NO. Existing Est. 20575/P20575		2. DISTRICT CODE 3 5	
	3. TYPE OF INSPECTION <input checked="" type="checkbox"/> MEAT <i>Equine</i> <input type="checkbox"/> POULTRY <input type="checkbox"/> IMPORT			
	4. DATE OF SURVEY 06/06/2013			
	5. NAME AND MAILING ADDRESS OF APPLICANT Rains Natural Meats, 23795 260th Street, Gallatin, MO 64640		6. LOCATION OF ESTABLISHMENT (If different from Item 5)	
		7. ADDRESS OF DISTRICT OFFICE 4700 S. Thompson, Springdale, AR 72764		
8. DATE ESTABLISHMENT WILL BE READY FOR SERVICE <i>See Summary in remarks</i>				
9. RECOMMEND FOR GRANTING INSPECTION SERVICE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		10. ASSIGNMENT WILL BE COVERED BY: (Number)		
		FULL-TIME INSPECTORS	PART-TIME INSPECTORS	

REMARKS (Use additional blank pages as necessary)

Per FSIS Directive 5220.1 R1 Section V. Part J.-

1.) Physical review of the facility was conducted on 6/6/2013. It was determined based on a walk through and inspection of the facility the basic requirements of 9 CFR 416.1 through 416.5 have been met. The plant is currently a FSIS inspected facility that requested a voluntary suspension of operations in July 2012.

2) Sanitation Standard Operating Procedures have been developed and are in place. The initial requirements of 9 CFR 416.12(a-d) and 416.16 have been met.

3) Rains Natural Meats has conducted a hazard analysis and developed a Hazard Analysis and Critical Control Point (HACCP) plan. The hazard analysis and HACCP plan cover equine slaughter. Initial requirements of the 9 CFR 417 regulations are in place.

4) A written recall plan is in place specific to the establishment as required by 9 CFR 418.

Other pertinent information:

1) The facility meets core livestock handling requirements for livestock slaughter and plant management demonstrates an understanding of their obligation to meet the appropriate requirements of 9 CFR 313.

2) Proper permitting/documentation per 9 CFR 304.2(c)(1) was requested. Plant management will submit documentation via fax to the Springdale District Manager (DM) once obtained.

Summary: Pending receipt of adequate documentation to ensure compliance with 9 CFR 304.2 (c)(1), the facility met the requirements to conditionally operate once a Grant of Inspection has been issued.

The above-named establishment was surveyed and found to be in compliance as indicated above. Service should be inaugurated as indicated in Item 8 above.

CIRCUIT SUPERVISOR'S SIGNATURE 	DATE 6/7/2013
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