



092569

B-163450
6-24-70

173

REPORT TO THE CONGRESS

Weak Enforcement Of Federal Sanitation Standards At Meat Plants By The Consumer And Marketing Service

B-163450

Department of Agriculture

BY THE COMPTROLLER GENERAL
OF THE UNITED STATES

~~715084~~

JUNE 24, 1970

092569



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON D C 20548

B- 163450

To the President of the Senate and the
Speaker of the House of Representatives

This is our report on weak enforcement of Federal sanitation standards at meat plants by the Consumer and Marketing Service, Department of Agriculture. Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

Copies of this report are being sent to the Director, Bureau of the Budget, and to the Secretary of Agriculture

A handwritten signature in cursive script that reads "James B. Stacks".

Comptroller General
of the United States

C o n t e n t s

	<u>Page</u>
DIGEST	1
CHAPTER	
1	INTRODUCTION 6
	Federally inspected plants 6
	Nonfederally inspected plants receiving Federal grading service 7
	Program administration 8
2	ENFORCEMENT OF SANITATION STANDARDS IN FED- ERALLY INSPECTED PLANTS 10
	Unsanitary conditions at selected fed- erally inspected plants 14
	Plant A 16
	Plant B 18
	Plant C 25
3	ENFORCEMENT OF SANITATION STANDARDS IN NON- FEDERALLY INSPECTED PLANTS RECEIVING FEDERAL GRADING SERVICE 31
	Unsanitary conditions at selected non- federally inspected plants 34
	Plants D and E 34
	Plant F 37
	Plant G 38
4	CONCLUSIONS, RECOMMENDATIONS, AND AGENCY ACTIONS 41
	Conclusions 41
	Recommendations 42
	Agency actions 43
5	SCOPE OF REVIEW 47
APPENDIXES	
I	Letter dated June 15, 1970, from the Adminis- trator, Consumer and Marketing Service, to the General Accounting Office 51

	<u>Page</u>
APPENDIXES	
II Deputy Administrator's memorandum dated May 14, 1969, to Regional Directors concerning a federally inspected plant where sanitation standards were "grossly neglected"	59
III Principal officials of the Department of Agriculture responsible for administration of activities discussed in this report	65

ABBREVIATION

C&MS Consumer and Marketing Service

D I G E S T

WHY THE REVIEW WAS MADE

The Congress has determined that it is essential for the health and welfare of consumers to be protected by ensuring that meat and meat food products distributed to them are wholesome and processed under sanitary conditions.

Under the Federal Meat Inspection Act, the Consumer and Marketing Service, Department of Agriculture, has the responsibility for establishing and enforcing sanitation standards in federally inspected meat plants. Inspectors assigned to the plants are responsible for enforcing the sanitation standards. (See p. 6.)

The Consumer and Marketing Service also is responsible for ensuring that sanitation standards are maintained by nonfederally inspected plants that receive Federal grading service--a marketing service provided to meat plants upon request. (See p. 7.)

As of December 31, 1969, there were about 3,200 federally inspected plants and about 140 nonfederally inspected plants which had been approved by the Consumer and Marketing Service as eligible to receive Federal grading service.

The General Accounting Office (GAO) in a report to the Congress (B-163450, September 10, 1969) pointed out the need for the Consumer and Marketing Service to strengthen its enforcement procedures to ensure that standards for sanitation, facilities, and equipment were met by federally inspected poultry plants. Also, the Office of the Inspector General, Department of Agriculture, in 1965 and 1969 pointed out weaknesses in the enforcement of sanitation standards at federally inspected meat plants.

In view of previously indicated weaknesses in the enforcement of sanitation standards, GAO wanted to ascertain the adequacy of the Consumer and Marketing Service's enforcement of sanitation standards at meat plants provided Federal inspection or grading service.

GAO's review was directed primarily to certain of the plants which Consumer and Marketing Service records indicated had sanitation problems.

Conditions found in the plants and reported in this review therefore may not be typical of conditions in all plants receiving Federal inspection or grading service.

FINDINGS AND CONCLUSIONS

The Consumer and Marketing Service needs to strengthen its enforcement procedures to ensure that standards for sanitation are met by plants receiving Federal inspection or grading service.

Accompanied by Consumer and Marketing Service supervisory personnel, GAO visited 40 federally inspected plants and eight nonfederally inspected plants receiving Federal grading service. Evaluations of the plants were made in accordance with Consumer and Marketing Service sanitation standards. (See pp. 14 and 34.)

In calendar year 1969, the 40 federally inspected plants accounted for about 7.7 percent of the cattle and swine slaughtered and about 4.9 percent of meat products processed in all federally inspected plants.

Consumer and Marketing Service inspection personnel were not uniform in their enforcement of sanitation standards and generally were lenient with respect to many unsanitary conditions unless product contamination was obvious.

At 36 of the 40 federally inspected plants and at the eight nonfederally inspected plants, animals were being slaughtered or meat food products were being processed for sale to the consuming public under unsanitary conditions. GAO observed instances of product contamination at 30 of the federally inspected plants and at five of the nonfederally inspected plants. Some of the major unsanitary conditions observed during GAO's plant visits included.

- Lack of adequate pest control as evidenced by flies, cockroaches, and rodents.
- Improper slaughter operations resulting in contamination of carcasses with fecal material and hair.
- Use of dirty equipment and processing of product in unsanitary areas.
- Contamination of product by rust, condensation, and other foreign material from deteriorated or poorly maintained overhead structures. (See pp. 15 and 34.)

Examples illustrating sanitation problems at federally inspected and nonfederally inspected plants visited by GAO are located on pages 16 to 30 and pages 34 to 40, respectively.

At the plants visited, Consumer and Marketing Service inspection personnel had not consistently

- rejected for use equipment and plant areas or suspended inspection in federally inspected plants when unsanitary conditions were found and
- recommended the withdrawal of Federal grading services at nonfederally inspected plants that were found operating under unsanitary conditions.

If Federal inspection service is suspended, a plant cannot slaughter animals or process meat for movement in interstate commerce. The withdrawal of grading service from a nonfederally inspected plant precludes the plant's using any official mark or other identification of the Federal grading service. (See pp. 6 and 8.)

GAO was unable to ascribe to any one cause the failure of inspection personnel to require plant managements to promptly and effectively correct unsanitary conditions. GAO believes, however, that a primary cause of the lack of uniformity and leniency in enforcement of sanitation standards was a lack of clear and firm criteria setting forth the actions to be taken when unsanitary conditions were found.

GAO believes that weaknesses in the Consumer and Marketing Service's system for reporting on plant reviews also contributed to the inadequate enforcement of sanitation standards at federally inspected plants. Because reports generally did not show what action, if any, was taken to correct reported unsanitary conditions, information was not readily available to Consumer and Marketing Service management as to whether appropriate and timely corrective actions were required by inspection personnel. (See p. 41.)

Clear and firm criteria--setting forth the actions to be taken when unsanitary conditions are found--and improved reporting policies can provide a basis for improving the enforcement of sanitation standards at meat plants. In the final analysis, GAO believes that the effectiveness with which such standards are enforced will be dependent on the resolve of Consumer and Marketing Service personnel at each and every level--from the plant inspectors to the Washington officials.

RECOMMENDATIONS OR SUGGESTIONS

The Administrator of the Consumer and Marketing Service should reemphasize to individual employees at all levels their responsibilities for the enforcement of regulations to ensure that meat and meat food products are wholesome and unadulterated.

To assist employees at all levels in carrying out their responsibilities the Administrator should establish

- criteria setting forth specific conditions under which inspection and grading services should be suspended at plants in violation of sanitation standards and under which equipment and specific plant areas in federally inspected plants should be rejected for use until made acceptable and
- a uniform reporting policy whereby action taken and to be taken will be a required part of all reports pertaining to observed sanitation deficiencies. (See p. 42.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

The Administrator of the Consumer and Marketing Service (see app. I) stated that:

- The conditions described in GAO's report are of deep concern to the Department of Agriculture, and the Department is and has been determined to eliminate such threats to the wholesomeness of the Nation's meat and poultry products.
- The emphasis and objectives of the major inspection improvement program already under way and now being intensified in the Consumer and Marketing Service are completely in line with and responsive to GAO's recommendations.
- Much has been accomplished but much remains to be done.

With respect to specific actions taken and planned, the Administrator stated that:

- A letter had been directed to all Consumer Protection Program personnel clearly outlining inspection objectives and procedures regarding sanitation and assuring each employee of full support for his efforts in enforcing sanitation standards.
- Meetings would be held with committees from major meat packer organizations for the purpose of reemphasizing meat inspection objectives and developing an educational program for their membership on the whole spectrum of meat inspection, particularly sanitation.
- Revised procedures, forms, and instructions had been issued to assist inspectors in carrying out the Consumer and Marketing Service's policy at plants where unsanitary conditions are found, including criteria for withholding or suspending inspection for cause.

The Administrator also provided detailed information on enforcement actions taken as a result of the inspection improvement program. He

stated that, although the record demonstrates progress during the past year, the need for still further action is acknowledged.

The action needed will be determined by a management study now under way to determine improvements needed in administration. This study is expected to have strong impact on carrying out GAO's recommendation relating to improved reporting systems to demonstrate actions taken.

The Administrator provided the following report on the status of the 48 plants visited by GAO as determined by recent Consumer and Marketing Service plant visits.

- Federal inspection has been discontinued at five of the 40 federally inspected plants.
- Conditions of sanitation in 27 of the federally inspected plants have been so improved as to meet Consumer and Marketing Service sanitary requirements.
- Two of the eight nonfederally inspected plants ceased operations following withdrawal of recognition for Federal grading service.
- Four nonfederally inspected plants' operating conditions are now acceptable.
- In the remaining eight federally inspected plants and the two nonfederally inspected plants, action has been taken to protect the product while the remaining needed plant improvements are being completed.

GAO believes that the actions already taken and the further actions outlined by the Administrator, if fully implemented, substantially comply with its recommendations and will provide greater assurance to the consuming public that meat products are processed under sanitary conditions. GAO believes, however, that, even with the intensified enforcement actions planned by the Consumer and Marketing Service, continuing efforts of all inspection personnel to require compliance with sanitation standards are vital to maintaining the integrity of the inspection program and ensuring the consuming public of a wholesome product.

MATTERS FOR CONSIDERATION BY THE CONGRESS

This report discusses matters of such importance to the consuming public that the Congress may wish to consider the facts revealed and the steps being taken to correct the situation.

CHAPTER 1

INTRODUCTION

The General Accounting Office review of the adequacy of the enforcement of sanitation standards at meat plants receiving Federal inspection or grading services was directed primarily to selected plants which Consumer and Marketing Service (C&MS) records indicated had sanitation problems. Therefore, the matters discussed in this report may not be typical of sanitary conditions in all plants receiving Federal inspection or grading services. During our visits to selected plants, we were accompanied by C&MS supervisory personnel and evaluations of the plants were made in accordance with C&MS sanitation standards. Details on the scope of our review are described on page 47.

FEDERALLY INSPECTED PLANTS

The Federal Meat Inspection Act (21 U.S.C. 601) provides for the Federal inspection of meat and meat food products to prevent the movement in interstate commerce of meat products which are unwholesome; adulterated;¹ or improperly marked, labeled, and packaged. The act provides also that each plant slaughtering animals or processing meat or meat products for sale in interstate or foreign commerce be operated in accordance with such sanitary practices as are required by regulations promulgated by the Secretary of Agriculture.

The Secretary has delegated authority under this act to the Administrator of C&MS to suspend inspection at any plant failing to maintain sanitary conditions. If suspended, a plant cannot slaughter animals or process meat

¹With respect to sanitation, the Federal Meat Inspection Act defines a product as adulterated if (1) the product has been prepared, packed, or held under unsanitary conditions whereby it may have become contaminated with filth or rendered injurious to health or (2) the product consists in whole or in part of any filthy, putrid, or decomposed substance or is for any reason unsound, unhealthful, unwholesome, or otherwise unfit for human food.

products for movement in interstate commerce. Federal inspection may be resumed when the plant complies with Federal standards. Also, C&MS inspectors assigned to individual plants have authority to temporarily withhold inspection from an entire plant or individual operations within a plant where unsanitary conditions are found.

In accordance with the requirements of the act, regulations setting forth the standards for sanitation were published in the Federal Register (9 CFR 308). The regulations provide that meat inspection personnel will reject for use any unclean equipment, utensil, room, or compartment. Also, a Manual of Meat Inspection Procedures was published to assist meat inspection personnel in carrying out their responsibilities. As of December 31, 1969, there were 3,069 plants under Federal inspection.

Under the provisions of Public Law 87-718, dated September 28, 1962 (7 U.S.C. 450), the Secretary of Agriculture has entered into cooperative agreements with States under which the Federal Government provides financial aid to States which cooperatively carry out Federal meat inspection activities. Generally, inspection of plants approved pursuant to this law is carried out by State personnel with Federal supervision. The plants are referred to as Talmadge-Aiken plants and are required to meet the same standards as plants approved under the Federal Meat Inspection Act. As of December 9, 1969, there were 155 such plants.

NONFEDERALLY INSPECTED PLANTS RECEIVING FEDERAL GRADING SERVICE

In addition to the federally inspected and Talmadge-Aiken plants, there are an estimated 9,100 State-inspected plants which slaughter animals or process meat and meat products for sale in intrastate commerce. The nonfederally inspected plants were not included in our review unless the plants were receiving Federal grading service under the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621). This act authorizes the Secretary of Agriculture to furnish meat-grading service to plants that request the service in order that the marketing of meat products may be facilitated and consumers may be able to purchase the quality of meat products which they desire.

To qualify for Federal meat-grading service, C&MS regulations provide, in part, that a nonfederally inspected plant have facilities constructed, fitted, and equipped for the purpose used and be maintained so that all products prepared therein will be clean and otherwise sound, wholesome, and fit for human food. As of December 31, 1969, there were 144 nonfederally inspected plants which had been approved by C&MS as eligible to receive Federal grading service.

The regulations provide also for initial surveys of nonfederally inspected plants to establish the eligibility of such plants for Federal grading service and for routine surveys at any time thereafter to establish the plants' continued eligibility under the regulations. All such surveys are made by veterinarians employed by C&MS. In addition, Federal graders are instructed to report any obvious or major violations of C&MS inspection and sanitation standards which they observe during their meat-grading assignments.

If C&MS determines that a plant is not in compliance with Federal standards, grading service is withdrawn for a minimum of 30 days. Withdrawal of grading service precludes the plant's using any official mark or other official identification of the Federal grading service. The plant may continue to slaughter animals and process meat for sale in intrastate commerce unless C&MS determines that the plant is endangering the public health. Under procedures promulgated by the Secretary of Agriculture pursuant to the Federal Meat Inspection Act, if such a determination is made, State meat inspection officials are provided 5 days and the Governor of the State an additional 5 days, if needed, to eliminate the health hazard. If the State does not act to eliminate the health hazard, the Secretary of Agriculture designates the plant as subject to Federal inspection under the Federal Meat Inspection Act and does not permit the plant to operate until it is capable of producing a wholesome product.

PROGRAM ADMINISTRATION

The Federal meat inspection program, under the overall administration of C&MS headquarters in Washington, D.C., is carried out by eight consumer protection regional offices

each of which is headed by a regional director. The regional offices are located in Atlanta, Georgia; Chicago, Illinois; Dallas, Texas; Kansas City, Missouri; Philadelphia, Pennsylvania; Raleigh, North Carolina; San Francisco, California; and St. Paul, Minnesota.

The territory of each regional office is divided into circuits. Circuit officers in charge have responsibility for supervising the inspectors assigned to plants in their circuits. The day-to-day inspection services are performed by inspectors assigned to individual plants. Washington personnel also visit plants to review slaughtering and processing operations to determine the effectiveness, efficiency, and uniformity of the inspection programs of the regions.

The cost of the Federal meat inspection program is generally paid for by the Federal Government or by States receiving Federal assistance under Public Law 87-718. The costs for overtime and holiday inspection and for grading services are charged to the plants receiving the services. The Agriculture Appropriation Act for fiscal year 1970 (83 Stat. 244) made available about \$80 million for carrying out the meat inspection activities of C&MS.

The principal officials of the Department of Agriculture responsible for administration of activities discussed in this report are listed in appendix III.

CHAPTER 2

ENFORCEMENT OF SANITATION STANDARDS

IN FEDERALLY INSPECTED PLANTS

At the plants we visited, C&MS inspection personnel were enforcing compliance with some sanitation standards but the degree of enforcement varied from plant to plant. We concluded that C&MS personnel were generally lenient with respect to many unsanitary conditions unless product contamination was obvious. Of the 40 plants visited, 36 were slaughtering animals or processing meat and meat food products for sale to the consuming public under unsanitary conditions which could result in product contamination. At 30 of the plants, we observed instances of product contamination.

During the early stage of our review, C&MS Washington officials took action to strengthen the enforcement of sanitation standards by issuance of instructions requiring the regions to achieve full compliance with sanitation and inspection regulations. Subsequently, regional officials began suspending inspection services at some plants because of unsanitary conditions, and the Department of Agriculture issued public announcements naming the plants where services were suspended.

Our visit to plants during the remainder of our review, however, revealed numerous sanitation deficiencies. In our opinion, the continued existence of unsanitary conditions requires C&MS to further intensify efforts to strengthen the inspection program to ensure correction of unsanitary conditions that have been permitted to exist for years.

The need for improved enforcement of sanitation standards has been pointed out in reports issued by the Office of the Inspector General, Department of Agriculture, and by our Office. In a report to the Congress (B-133192, June 19, 1959) on a review of meat inspection activities of the Department of Agriculture, we reported that meat inspection supervisory visits to 255 plants revealed that 120 were operating under unsanitary conditions.

In October 1965, the Office of the Inspector General reported the existence of unsanitary conditions in a number of meat plants. The report cited many types of unsanitary conditions, such as inadequate vermin control, unclean saws and meat carts, flaking paint directly over exposed meat, and dragging meat products on the floor. The report concluded that a passive attitude on the part of meat inspectors, a general reluctance to incur the displeasure of plant management, and a lack of uniformity in the enforcement of sanitary requirements contributed to the unsanitary conditions. More recently, in December 1969, the Office of the Inspector General issued another report concerning the continued existence of unsanitary conditions in meat plants.

C&MS Washington reviewers' reports on their 1967 through 1969 visits to federally inspected plants disclosed unsanitary plant conditions in all C&MS regions. Although the Washington reviews were to be treated as evaluations of the effectiveness of regional inspection programs, action was not taken to bring about regionwide improvements. Consequently, sanitation deficiencies found during 1967 reviews continued to be found during 1969 reviews. For example, the sanitation of carcass coolers was found unacceptable in 25 percent of 489 plants reviewed in 1967; 29 percent of 65 plants reviewed in 1968; and 42 percent of 102 plants reviewed in 1969.

We were unable to ascribe C&MS's laxity in enforcing compliance with sanitation standards to any one cause. We believe, however, that a principal cause was a lack of clear and firm criteria as to the actions to be taken by C&MS inspectors when sanitation standards were not met. For example, the C&MS inspection manual provides that inspectors ensure that plant management prevent entry of rodents to the plant but does not provide any guidelines as to the extent of rodent infestation that would justify suspension of inspection services.

Also, enforcement of sanitation standards was not uniform among the regions. Of the four C&MS regions we visited, one appeared to have a much stronger enforcement program than the other three. This region had on a number of occasions during 1969 temporarily suspended inspection services

at several plants because of noncompliance with sanitation standards.

In the other three regions, C&MS inspectors generally were more lenient in enforcing C&MS sanitation standards. C&MS personnel were rejecting for use some unclean equipment and areas and were calling the attention of plant management to various unsatisfactory conditions. Through such measures and occasional warning letters, C&MS personnel were trying to bring about improved sanitation through persuasion. After our visits to some of the plants, C&MS personnel adopted more stringent measures, including suspension of inspection services from plant areas having numerous sanitation deficiencies.

During our review, the Deputy Administrator for Consumer Protection cited in a May 1969 memorandum to regional directors an example (see app. II) where enforcement of sanitation standards was "grossly neglected" in a federally inspected plant--not visited by us. He stated that similar conditions would not be condoned in other federally inspected plants. The actions cited in this example provided some criteria as to corrective measures to be taken at this plant. Subsequently, C&MS suspended inspection services at some other plants because of unsanitary conditions. These actions indicate a strengthening of C&MS enforcement efforts.

Commencing about 1 month after issuance of the Deputy Administrator's memorandum, however, we visited 33 federally inspected plants in four C&MS regions and found that sanitation standards were still not being strictly enforced. The conditions observed in two of the 33 plants are discussed commencing on pages 16 and 18.

In our opinion, weaknesses in C&MS's system for reporting on plant reviews also contributed to the inadequate enforcement of sanitation standards. Although unsanitary conditions were being reported in most cases, the reports generally did not show what action, if any, was taken to correct the conditions. As a result, information was not readily available to C&MS management as to whether appropriate and timely corrective actions were required by responsible C&MS personnel.

We discussed the weaknesses in the reporting system with the Administrator of C&MS in August 1969. The Administrator agreed that substantial improvements were needed. He advised us that the Regional Directors had prepared a revised reporting policy statement which, among other things, provides for "action taken" to be an essential part of the weekly sanitation reports prepared by the C&MS inspectors located at individual plants. This policy statement, however, did not apply to other reports concerning sanitation, such as those prepared by Washington, regional, and circuit office personnel on their plant reviews.

Other reasons for inadequate enforcement of sanitation standards suggested by the Office of the Inspector General or C&MS regional personnel include:

- The possibility that strict enforcement of sanitation standards by inspectors in old plants might result in plant closures and require inspectors to relocate.
- Lack of support from higher levels of management within C&MS when inspectors attempted to require correction of deficiencies.
- Inspectors' reluctance to incur the displeasure, irritation, or antagonism of plant management that might result from enforcing the regulations.
- Past acceptance at all levels within C&MS of inadequate performance by plant management.

UNSANITARY CONDITIONS AT SELECTED
FEDERALLY INSPECTED PLANTS

We selected for our tests 40 federally inspected plants. These included 32 plants which were staffed by C&MS inspectors and eight Talmadge-Aiken plants which were generally staffed by State inspectors. C&MS records show that in calendar year 1969 the 40 plants accounted for about 7.7 percent of the 106 million cattle and swine slaughtered and about 4.9 percent of the 48.8 billion pounds of meat products processed in federally inspected meat plants.

The plants visited were selected primarily because C&MS records indicated that they had sanitation problems. Some of the plants were selected because they were receiving Federal supervision of inspection activities under the Talmadge-Aiken program and because they were located in the general vicinity of other plants selected.

We accompanied C&MS supervisory personnel to the 40 plants and observed slaughtering operations at 29 plants and processing operations at 23 plants. In 36 of the 40 plants, we observed unsanitary conditions which could result in product contamination. At 15 of the plants, we completed a C&MS review form to evaluate the plants' compliance with C&MS standards. We discussed the review forms we completed with the C&MS personnel who expressed agreement with our observations. At the other 25 plants, C&MS personnel prepared the plant review forms. The following table summarizes, for various categories of sanitation under slaughtering and processing operations, the percentage of times on the plant review form where sanitation in the 40 plants was below C&MS standards during these reviews.

	Percent of times sanitation below C&MS standards	
	<u>Federal</u>	<u>Other Federal (note a)</u>
Slaughtering operations		
Operative sanitation (equipment, floors, walls, overhead, clothes, and hygienic practices)	62	42
Sanitation of coolers	66	69
Carcass cleanliness	40	57
General sanitation (dry storage, pest control, and employee welfare facilities)	62	66
Processing operations		
Facilities sanitation (equipment, floors, walls, ceilings, doors, rails)	68	74
Operating and product storage areas	47	57
General sanitation (dry storage, pest control, and employee welfare facilities)	61	80

^a These are Talmadge-Aiken plants receiving Federal supervision of inspection activities

Some contaminated products were observed in 30 of the plants visited. Contaminants observed included fecal material, stomach contents, hair, rust, and condensation. Potential contamination was evidenced by deteriorated floors, walls, and overhead structures; rusty equipment; generally poor sanitation; and inadequately cleaned equipment.

Evidence of inadequate pest control was observed in 27 of the plants. Inside two of the plants, we observed live rodents. At one of these plants, we observed evidence that rodents had contaminated unwrapped cheese stored for use in meat-cheese products. Also, we observed evidence of rodents, primarily rodent feces, inside five additional plants, and at seven other plants we observed rodents or evidence of rodents on the outside premises or in areas where inedible products were processed. At the remaining plants, pest control was considered inadequate, primarily because of the presence of flies or cockroaches in operating areas of the plants.

The following examples, in our opinion, illustrate the types of sanitation problems at the 40 federally inspected plants.

Plant A

C&MS records showed that this large federally inspected plant had significant sanitation problems, stemming primarily from rodent infestation. An inspector's concern over this problem was expressed in a June 1969 letter to the circuit officer in charge as follows:

"*** has an almost impossible rat infestation from a 'Meat Inspection' point of view. I have seen rats each evening in the plant in various places. Mr. *** the regular night inspector has been faced with the same problem.

"I talked with Mr. *** plant superintendent, and he said he would contact *** Pest Control who has the contract with the establishment.

"I talked with two men from the exterminator service tonight and they said it was useless to put out baited traps in the plant where so much meat is available to them.

"One of the very bad spots is the tempering room just off the freezer dock. I recommend this room either be taken away from the est. [establishment] as a meat storage room or the meat that is put in there be rat-proofed in a manner acceptable to us (by covering with a material impervious to rats, etc.).

"This is a very serious situation, Dr. *** I'm concerned because of the potentially dangerous disease situation."

On November 5, 1969, we accompanied the circuit officer in charge on an inspection of this plant. We observed several rats on the outside plant premises. Within the plant, we observed a rat, rodent feces, and a hole which had been chewed through a wall in the processing area. Through discussions with assigned meat inspection personnel, we learned that an area adjacent to the plant included a city dump and a plant waste lagoon, both of which were

rodent harbors. C&MS inspectors informed us that the rodents probably had burrowed tunnels from the lagoon and the city dump to the plant, which resulted in an infestation almost impossible to stop.

After our visit, the Acting Regional Director warned the plant's management that (1) operations would not be permitted in any room showing evidence of rodent infestation or access avenues, (2) if a general infestation were found, no slaughtering or processing operations would be permitted, and (3) any product leaving the plant would be monitored by use of a black light to detect evidence of contamination.

We were advised by C&MS personnel that the black-light monitoring would detect the presence of rodent urine but that it would not disclose whether rodents had climbed over the product. In subsequent discussions with C&MS personnel, we were advised that the monitoring operation had showed that two carcasses were contaminated with rodent urine and that considerable rodent urine was present on the floor.

During the 2-week period after the warning, C&MS inspectors observed rodents or evidence of rodents on six occasions. C&MS officials advised us that, when evidence of rodents was found, operations in the affected area were stopped, access avenues were found and sealed off, the area was sanitized, and, where appropriate, the product was examined for contamination. Operations, however, were not suspended throughout the entire plant.

In view of the history of rodent infestation and the probability of product contamination, it seems likely that contaminated products were distributed from the plant to the consuming public.

Plant B

During the period June 1968 through October 1969, C&MS supervisory personnel made eight reviews of slaughtering or processing operations at this large federally inspected plant--one of three operated by this company. Reports on the reviews and correspondence repeatedly cited deficiencies in sanitation. Some of the more frequently reported deficiencies were attributable to widespread inadequate maintenance and cleaning of facilities and equipment and inadequate pest control measures.

Deficiencies were summarized in a February 6, 1969, report by an Assistant Deputy Administrator of C&MS after a review by Washington reviewers, as follows:

"Results of this review indicate problems in several highly important areas of the Consumer Protection Program. These include sanitary carcass dressing procedures, plant maintenance, and inedible and condemned product handling and control.

"For the past 2-1/2 years, we have had veterinarians from both the Washington level and Regional level in the field reviewing all establishments under Federal inspection. This is to promote uniformity throughout the Program and to assure the consumer that our minimum standards for wholesomeness and cleanliness are observed. At least four separate reviews of the *** plants have been made during this period. All have indicated continuing problems in the above-mentioned areas.

"*** Our files of past sanitation reports indicate that repeated deficiencies in proper cleanup, rodent and pest control, etc., have existed and been made known to plant management. Problems have been especially evident in the inedible and condemned product handling areas."

Following a visit by a circuit supervisor in July 1969, the circuit officer in charge wrote a letter to the plant manager stating that the facilities and conditions were unacceptable by C&MS standards. The letter stated also that plant actions had not substantially altered the plant deterioration or eliminated areas of potential and actual contamination. The letter warned that certain areas would be rejected and that C&MS would suspend or withdraw inspection services unless the plant met the following requirements.

- "1. All real sources of contamination such as condensation, ceiling leaks, etc. must be eliminated immediately, and potential sources of contamination such as rusty doors, door jambs, flaking paint on walls, etc. can be programmed over the next 60 days.
- "2. Submit a written proposal by August 29, 1969 for updating the plant walls, floors, ceilings, lighting and sewers to meet acceptable facility and sanitary standards within the next six months."

However, reports by C&MS inspectors through October 11, 1969, continued to show sanitation problems including rodent and cockroach infestation, inadequate sewage disposal, deteriorated facilities, poor drainage, and scaling paint.

On October 29, 1969, about 90 days after the officer in charge sent the letter of warning to plant management, we accompanied C&MS supervisors on reviews of slaughtering and processing operations. For slaughtering operations, the C&MS reviewer rated 59 percent of the items reviewed as below C&MS standards. Some of the deficiencies observed by the reviewer are summarized below.

Floors, walls, and overheads

--There were several areas, especially the slaughter, offal, and inedible departments where the walls, columns, and door and window casings were broken, peeling, and crumbling. Several window panes were missing, and windows were not screened.

--Overhead areas in slaughtering, offal, and pork cut departments had broken or crumbling plaster, peeling paint, or flaking rust.

Equipment

--Inspection of equipment prior to start of operations in the pork cut, offal, and slaughtering departments disclosed unclean equipment and equipment that was in an unacceptable state of repair and therefore not conducive to being properly cleaned.

General sanitation

--In the offal department, meat scraps from the previous day's operations were not removed from floor and equipment. A few fresh hams and uncured bacon slabs in the offal cooler were contaminated with granular or flaked material. Condensation from a refrigeration component was dripping on some of the product. Bone chips were found in pork brains.

--In the pork cooler, a carcass had fallen to the floor and was being splattered with water by an employee washing the floor. Carcasses contacted the floor occasionally while being transported to the pork cut department.

--In the inedible product area, crud, dead cockroaches, and a decomposed rat were observed. Also a strong odor hung generally throughout the area and permeated one's clothing while passing through. Some of the containers were not clearly marked to show that they were to be used only for inedibles.

For processing operations, the reviewer rated 58 percent of the items reviewed as below C&MS standards. Some of the deficiencies observed by the reviewer are summarized below.

Floors, walls, and overhead

--Smokehouse, ham and picnic cooler, freezer, and bacon slice floor needed cleaning. Some rails needed

to be reconditioned due to rust, grease, and scaling coatings. Deteriorating doors did not fit properly to prevent openings from outside. Doors into the ham and picnic cooler had an accumulation of product residue. Some doors had rust on metal surfaces and fat and meat residues in hard-to-clean crevices.

Equipment

--Several pieces of equipment were unclean or in need of repair to facilitate proper cleaning. Also, cutting boards needed to be replaced.

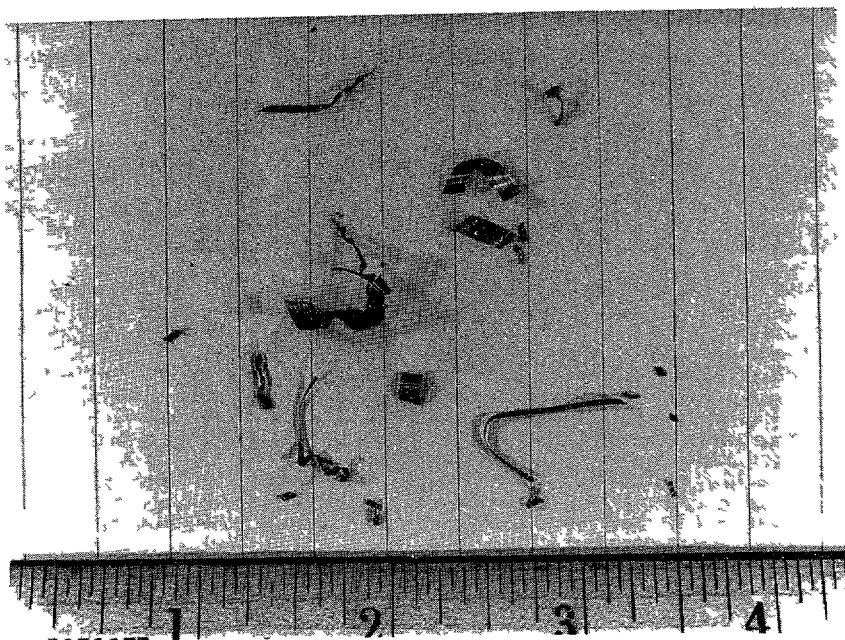
General sanitation

--Product packaging material was contaminated by mouse droppings and a putrid piece of meat. Concrete pillars being contacted by beef carcasses were not metal clad to facilitate cleanliness. Sewage frequently backed into plant areas. Unwrapped frozen product was stored on unclean wooden racks.

Pest control

--Some doorways and openings provided accessibility to rodents. Evidence of rodent runs was observed along the foundations of the plant and outer buildings, and a few dead cockroaches and a live mouse were observed inside the plant.

During the review we observed metal shavings protruding from the blade of a carcass-splitting saw. (See photograph below.) We easily removed some of the shavings from the blade which, in our opinion, could have become embedded in a carcass and could have resulted in a hazardous product. We showed the metal shavings to the C&MS reviewer but he did not require that the blade be replaced.



Metal Shavings Removed From Carcass
Splitting Saw Blade

Although numerous sanitation deficiencies were observed by C&MS inspection personnel during our visit to the plant, they permitted slaughtering and processing operations to continue. Inspection personnel, however, required some deficiencies to be corrected at the time of our visit.

After our plant visit, we discussed plant conditions with the Regional Director and C&MS Washington officials. As a result of our discussion, C&MS reviewers from Washington and from the regional office visited the plant on November 5, 6, and 7, 1969, about 1 week after our visit, to evaluate slaughtering and processing operations.

During the Washington reviewers' visits to the plant, two processing reviews and one slaughtering review were completed. The reports of the two processing reviews showed that 69 percent and 52 percent of items reviewed were below C&MS standards. The slaughtering report showed that 23 percent of the reviewed items did not meet C&MS standards.

Deficiencies noted during the processing reviews pertained to sewers, floors, rails, ceilings, walls, and pest

control. During the reviews, operations were suspended in a smoked-meat chilling room and a bacon-curing area because of unsanitary conditions. One of the processing reviewers rated corrective actions by the C&MS inspector and employee supervision by plant management as below C&MS standards because inspectors permitted the use of operating areas which were "found unacceptable on operating sanitation reviews" and because plant management used "operating areas and rooms that are incapable of being cleaned in an acceptable manner."

A comparison of the slaughter review report completed by C&MS Washington personnel with the slaughter review report completed at the time of our visit indicates that plant conditions had improved. The carcass coolers, however, still appeared to be unacceptable. The following comments from the review by Washington personnel show the nature of the deficiencies observed in the carcass coolers.

"Sanitation and maintenance of the carcass cooler were generally poor as evidenced by corroded overhead structures, pitted floors, unclean support pillars. Some of the pillars were not metal clad where carcass contact occurred. The metal cladding on other areas was not properly sealed to the wall.

"Condensation, especially near the entrance door, was evident.

"Dirty feet, unshaved hair, and interdigital tissue left between the toes were observed on carcasses in the chill cooler."

In a letter to plant management dated November 12, 1969, the Regional Director enumerated deficiencies found by the Washington reviewers and established a deadline of 1 month or less for correction of many of the deficiencies. He also commented on conditions at the plant in a letter to the Deputy Administrator, as follows:

"When I met with the Washington Reviewers *** I asked if anyone felt inspection should be suspended at any one of the three *** plants. All

agreed they found no basis for suspension during their reviews. All agreed that the efforts by plant managements to present a sanitary plant were adequate at this time. I then asked if any of them noticed contamination that would make the product unwholesome. All were in agreement that the product contamination during their surveys was very minimal, however, the potential for product contamination was very great if maintenance and sanitation programs did not continue."

The above comment that the "potential for product contamination was very great" at this plant had previously been made in various reports by circuit and regional C&MS personnel. Circuit reviewers whom we accompanied to the plant stated that the facilities were unacceptable under standards prescribed by C&MS. They both stated in their reports, however, that product contamination could be avoided by strict adherence to the existing maintenance and sanitation program.

Plant C

This large federally inspected plant is used for slaughtering and processing operations. C&MS reports on sanitation showed very few problems between January 1967 and May 1968. Supervisory reviews of slaughtering operations in May and November 1968, however, showed considerable evidence of carcass contamination and a November 1968 report on a processing review by the circuit officer in charge showed that sanitation in the processing operations was below C&MS standards.

On May 29 and June 2, 1969, we visited this plant and observed widespread unsanitary conditions in both the slaughtering and the processing operations. Deficiencies observed included:

- condensation dripping from ceilings onto meat, causing contamination,
- several large containers of meat contaminated by rust which had fallen from pipes,
- floors badly deteriorated and pools of stagnant water in several processing and slaughtering areas, and
- carcasses often contaminated with fecal material and hair during dressing operations.

There were many areas and items of equipment in this plant that appeared to us to be unsuitable for use in the preparation of food products. We observed that as a result products being prepared for human consumption were being contaminated.

Our observations were substantiated during a June 12, 1969, review by the Regional Deputy Director of Processing. The following comments were taken from the Deputy Director's report on his review.

"Many floors showed lack of a good cleaning program. Many need to be repaired to prevent 'puddling' of water. Floors must be repaired and

maintained so they are susceptible of being readily cleaned.

"A routine cleaning program must be established for walls. Preventative maintenance is necessary in many areas where they are crumbling and cracked.

"In general, the ceilings were of concrete. An exception of this is portion control of beef room for institutional cuts. Most of these ceilings have cracks with leaks in various areas. Some are controlled, others have been equipped with poorly constructed drip pans, which have been used for many years, being rusty, dirty, and not been fitted into the cleaning program. They have not been used as temporary measures. Condensation to the point of dripping was noted in many of these rooms. There must be an established program for correcting these conditions immediately. These are conditions of actual contamination of product in some area and serious potential contamination in others.

"Many doors were broken and rusty. Although most of them had at one time been metal-clad, they were in poor repair, and a preventative maintenance program must be established.

"Much of the inter-departmental equipment used to transfer or hold product was unacceptable. Specifically, the plastic type curing vats, which were broken and crumbling and in a poor state of repair. They were in use with a plastic liner in an attempt to cover the unacceptable conditions. This type of equipment must be rejected for use immediately since the plastic liners were not protecting the product. It was noted that many shipping containers were being used for interdepartmental containers. This included cartons and palletainers. Generally, the large wall-type diffusers were used for refrigeration units. These are very rusty and dirty and a program must be instituted to maintain these clean and sanitary.

"Product was being stored in areas while repair operations were in progress. This was resulting in contamination of product. These areas should be completely rejected and free of product until such time as they are made acceptable.

"Two large dry storage areas were visited. One was a box shop which was off the wooden dock in one building. The floor was wooden and had many cracks in it. The doors were not tight. The containers were stacked directly on the floor and they were being subjected to dust and other contaminating conditions. This area should be rejected immediately. The other area was a basement room which contained cartons and some non-meat ingredients, such as non-fat dry milk and cereal. The condensation in this room was extensive, causing a muddy, slippery condition on the floor and contaminating the stored material. This room is unacceptable for dry storage and should be vacated until made acceptable.

"Several product storage areas were a hazard to the product because of dripping condensation and unprotected leaks from the ceiling. Scaling paint and rust from the overhead was noticed. It is understood that these areas must be vacated until made acceptable.

"There were several wooden docks surrounding this building which were poorly maintained and inadequately cleaned. They need to be replaced with a permanent-type dock. They must be maintained in a clean, sanitary condition during the interim period, especially, must attention be given to the areas beneath these docks. The area surrounding the plant is gravel or has been graveled. There was water standing in puddles and this entire area needs immediate care. All parking and trucking areas around this plant should be hard surfaced.

"Several pieces of equipment was noted where plastic or cartons is used as part of operating equipment. Shipping containers or cartons were being

used for foot pads. It seemed to be the establishment management's idea that product could be protected with paper or plastic from unacceptable conditions.

"Some areas had adequate lighting. Many other areas were very dark. Some of these areas were critical and management must be required to provide adequate lighting. Examples - sausage chopping and formulating areas.

"The frequency and adequacy of inspectional reviews is questionable. Frequent in-depth reviews should be made by the OIC and supervisor to isolate and document those areas not acceptable for product and where immediate corrective action must be taken by the management. This will help set a priority program that management can understand and inspectors can enforce.

"There was much evidence of weak corrective action by the inspectors. Areas were found rejected with 'high' tags that would not really interfere with product movement. Some tags were noted that had been hanging overhead several months. Inspectors must reject all areas that are unacceptable.

"A meeting was held with the processing inspectors on the night of 6/12/69. Many of them complained about past lack of support from the OIC, the Regional Office and Washington level. They complained bitterly about previous actions taken by them to correct deficiencies in the plants on this circuit that was not supported by any level of management. During this meeting, Dr. *** assured these inspectors of his support and backing on their actions to gain correction. Assurance was also given for support from the Regional Office and at Washington level. Although the inspectors were enthusiastic in attitude toward doing a good job of inspection, they voiced much skepticism concerning this asserted support at higher level.

"While reviewing this establishment with Dr. *** , he was approached by management and asked to attend a conference with all levels of management at the *** office at 2 o'clock in the afternoon. I accompanied him at this meeting. The *** management started to discuss a program they wished to institute and were making complaints about operations being interrupted by several inspectors hanging tags at the same time. At about this point, Dr. *** stated that they were in more serious trouble than this. He told them they were going to lose entire departments that were found unacceptable.

"He stated his inspectors were being instructed to reject any area that was not acceptable regardless of size or type of operation. We were both somewhat surprised at the management's attitude when he made these statements. They did not appear surprised. They thanked him for giving them the facts. They gave assurances that they would try to stay ahead of the inspectors in this accelerated program. Dr. *** did not think they could stay ahead because several areas would be rejected Friday morning and that their operations would be seriously curtailed. An attitude of cooperation was displayed throughout the meeting by the *** management. One could not feel they realized the impact of Dr. *** statements, however; he was clear and patient in explaining to them the deficiencies noted on our review and the corrections expected.

"This plant definitely should be classed as one of our critical plants."

The substance of the above comments concerning contamination was summarized in a June 16, 1969, letter to plant management from the circuit officer in charge.

A subcircuit supervisor's report written later in June 1969 shows that, after our visit, the plant management planned renovations designed to correct the identified

problems at an estimated cost of about \$800,000. Meanwhile, operations had been curtailed at the plant.

In this case, plant management planned extensive renovation when advised that C&MS standards would be enforced. Also, the assurances given resident inspectors by C&MS regional officials that their efforts to enforce sanitation standards would be supported (see 5th par., p. 28) should encourage strict enforcement at this plant. We believe that the actions taken or planned by C&MS personnel and plant management, if properly implemented, should greatly reduce the probability that contaminated products will be shipped from this plant.

CHAPTER 3

ENFORCEMENT OF SANITATION STANDARDS

IN NONFEDERALLY INSPECTED PLANTS

RECEIVING FEDERAL GRADING SERVICE

At the eight plants we visited, animals were being slaughtered or meat and meat food products were being processed for sale to the consuming public under unsanitary conditions which could result in product contamination. At five of the plants visited, we observed instances of product contamination. Although C&MS had sent warning letters or had withdrawn grading service from a number of plants because of unsanitary conditions, it had not established any clear and firm criteria as to the extent of noncompliance with sanitation standards that would require withdrawal of grading service.

If requested, C&MS provides grading service to nonfederally inspected plants after a circuit officer in charge determines that the plants are operating in compliance with the inspection and sanitation standards of C&MS. These standards are essentially the same as those for federally inspected plants. After a plant receives approval for grading service, the circuit officer in charge is required to conduct periodic surveys of the plant's operations and to prepare a report of observed deficiencies. Copies of the report are furnished to plant management, local inspection personnel, and C&MS Washington officials.

Also, meat graders assigned to plants are instructed to report any obvious or major violations of inspection and sanitation requirements observed during their assignment. Examples of violations to be reported are (1) extremely unsanitary conditions in one or more approved departments, (2) vermin infestation, and (3) repeated observations of unsanitary conditions in one or more departments.

The instructions which provide for the circuit officers in charge to make periodic plant surveys neither specify the number of sanitation deficiencies which may exist

before withdrawal of service nor indicate whether certain sanitation deficiencies are more serious than others. The only specific criterion pertaining to withdrawal of grading service contained in C&MS instructions is that grading service should be immediately withdrawn if the C&MS reviewer finds that the plant is slaughtering when an inspector is not present.

To determine the effectiveness of C&MS's enforcement of sanitation standards at nonfederally inspected plants receiving Federal grading service, we reviewed about 500 plant survey reports for a 19-month period--January 1968 through July 1969--for the 150 plants that were approved for such service as of July 1969. The number of surveys at plants for this period ranged from one to seven, three surveys being the most common. Although many of these reports showed numerous deficiencies, plant managements were not consistently required to make corrections since some items were repeatedly reported to be in need of immediate correction.

The following table summarizes the 10 items most frequently reported to be in need of immediate correction.

<u>Item</u>	<u>Percentage of reports showing items deficient</u>
Cooler walls and ceilings	38
Cooler doors	24
Employees' dressing rooms	21
Slaughtering department lighting	21
Cutting tables	20
Cooler rails, hangers, and beams	18
Receptacles for inedibles	17
Storage area	17
Cooler floors	16
Slaughtering department floors	16

On the basis of plant surveys made from January 1968 through December 1969, C&MS withdrew grading service from 13 plants and sent warning letters to 10 other plants stating that grading service would be withdrawn unless the deficiencies were corrected. Although these actions show

that C&MS is making positive efforts to enforce sanitation standards at nonfederally inspected plants receiving Federal grading service, we believe that such enforcement on a uniform basis will continue to be difficult unless clear and firm criteria are established as to when a plant's noncompliance with sanitation standards requires withdrawal of grading service.

We believe also that Washington officials of C&MS were hindered in the enforcement of sanitation standards because the C&MS reviewing officials were not required to conclude in their survey reports that grading services should be continued or withdrawn. A C&MS Washington official responsible for reviewing the plant survey reports advised us that he was unable to determine from the information in the reports whether the grading service should be withdrawn and that he relied on the reviewing official to recommend withdrawal of grading service.

After we visited four plants, we met with the Administrator of C&MS and advised him of our observations. The Administrator informed us that, on the basis of conditions we observed, it was apparent that the C&MS policy--that nonfederally inspected plants receiving grading service should meet essentially the same standards for inspection and sanitation as federally inspected plants--was not uniformly understood and enforced at the field level. Subsequently, in August 1969, C&MS issued a policy statement:

- emphasizing that nonfederally inspected plants receiving Federal grading service must meet the same sanitation standards as federally inspected plants,
- requiring survey reports to be directed through the regional office and forwarded with the Director's recommendation to C&MS headquarters, and
- requiring a minimum of three surveys a year at each nonfederally inspected plant.

UNSANITARY CONDITIONS AT SELECTED
NONFEDERALLY INSPECTED PLANTS

We visited eight nonfederally inspected plants receiving Federal grading service, which included four plants in each of two C&MS regions. Plants in one region were selected for visits because they were located in the vicinity of federally inspected plants we visited, and the plants in the other region were selected because C&MS records showed that they had sanitation problems.

At our request, C&MS supervisory personnel accompanied us on our visits and made reviews of these plants. The reports which they prepared showed that the plants, in varying degrees, did not comply with C&MS sanitation requirements. As a result of these reviews, C&MS withdrew grading services from two of the plants. Subsequently, C&MS withdrew grading services from another plant we had visited. After we brought to the attention of the Administrator conditions at one of the plants where grading service had been withdrawn, C&MS declared the plant a health hazard. Subsequently, the plant's owner agreed to close the plant. (See Plant G, p. 38.)

During our plant visits, we observed unsanitary conditions at each plant that either resulted in or could result in product contamination. Product contamination observed in five of the plants included dead flies, fecal material, hair, and rust. Potential contamination was evidenced by peeling paint, rust, loose overhead plaster, condensation, unclean equipment and facilities, and unsanitary carcass-dressing procedures. In some plants, potential contamination resulted from inadequate pest control as evidenced by live roaches, flies, rodents, and rodent feces.

The following examples, in our opinion, illustrate the types of sanitation problems at the eight nonfederally inspected plants receiving Federal grading service which we visited.

Plants D and E

C&MS provided Federal grading service to these nonfederally inspected plants for several months after reviews

by C&MS personnel showed numerous deficiencies in sanitation, operations, and facilities. C&MS officials made six reviews at each of the plants from January 1967 through November 1968. Reports on these reviews indicated that the plants had a few sanitation deficiencies. Reports on reviews made in July and September 1969 at each of the plants, however, cited numerous areas in which the plants' sanitation measures were below C&MS standards. C&MS officials called these deficiencies to the attention of plant management but did not recommend withdrawal of grading services until after our visits to the plants in November 1969.

We accompanied the circuit officer in charge during reviews of both the plants on November 3, 1969, and compared the results of these reviews with those of earlier 1969 reviews. The comparison is summarized below.

<u>Date of review</u>	<u>Plant</u>	<u>Percent of items below C&MS standards</u>		
		<u>Slaugh- tering</u>	<u>Proc- essing</u>	<u>Combined report</u>
11- 3-69	D	48	58	
11- 3-69	E	56	74	
9-30-69	D	52	62	
9-30-69	E	72	54	
7- 2-69	D			23 ^a
7- 2-69	E			37 ^a

^aA single review form was used during the July 1969 review for both slaughtering and processing operations.

Examples of the deficiencies reported by C&MS reviewers for both plants included:

- Evidence of rodents in plant.
- Lack of control over other pests.

--Inadequate sanitation of floors, walls, overheads, and equipment.

After the July 2, 1969, reviews, the reviewer, in letters to the management of both plants, stated that much work needed to be done in the plants to bring them into compliance with C&MS requirements. After the September 30, 1969, reviews, the reviewer advised managements of both plants that there were many critical items in need of immediate attention. He advised the managements also that, if subsequent reviews disclosed no effort to correct the deficiencies, a recommendation to withdraw grading services would be made.

After our plant visit on November 3, 1969, the circuit officer in charge recommended that grading service be withdrawn from Plant D. On November 6, 1969, C&MS adopted the recommendation citing as its reason numerous deficiencies in sanitation, operations, and facilities. A similar recommendation was not made for Plant E.

Since reports on Plant E consistently showed more deficiencies than those on Plant D, we requested the Acting Regional Director to explain the apparent difference in treatment. He said that the circuit officer in charge had not recommended withdrawal of grading service from Plant E because of past progress by the plant in correcting deficiencies reported on prior C&MS reviews. Subsequently, in January 1970 C&MS withdrew grading service from Plant E on the basis of the plant's numerous deficiencies in sanitation, operations, and facilities.

Plant F

C&MS survey reports during the period January 1967 through June 1969 for this small cattle-slaughtering plant showed several deficiencies in sanitation and facilities. Certain deficiencies were repeated in reports on five consecutive reviews. None of the reports contained any indication that corrective action had been initiated or promised.

On July 11, 1969, we accompanied the circuit officer in charge on a review of the plant. Six items were found to be in need of immediate correction, and 12 additional items were identified as not meeting C&MS sanitation standards. Deficiencies observed included:

- Carcasses were badly contaminated with fecal material during carcass-dressing operations.
- Walls, floors, and ceilings in the slaughtering area were dirty.
- Several items of equipment were unclean.
- Condensation was dripping on carcasses in the cooler.
- Many flies were observed in the slaughtering area.
- Contaminants were washed into containers of edible product.
- Cattle pens were unpaved, and the cattle were standing in mud.
- Wooden doors were unclean.
- Flaking paint was observed in a cooler.

After completing the review, the circuit officer in charge met with plant officials and informed them of the deficiencies.

Later, while discussing our observations at the plant, the circuit officer in charge informed us that he was

undecided as to whether he should recommend withdrawal of Federal grading services. He stated that he would contact C&MS officials in Washington for assistance before making a recommendation.

Approximately 3 months later, on October 6, 1969, the circuit officer in charge again reviewed this plant. This report cited 18 deficiencies, many of which were the same as those mentioned on the previous review, but he recommended that Federal grading services be continued. Also, C&MS Washington officials responsible for reviewing these reports did not recommend withdrawal of Federal grading service from this plant.

Plant G

This nonfederally inspected plant had Federal grading service for several years prior to our visit in June 1969. After our visit, C&MS withdrew grading service and notified State officials that the plant was considered a health hazard. Subsequently, the plant was closed pending renovation.

During 1967 and 1968 the circuit officer in charge made six reviews of this plant and rated from two to 13 items in need of immediate correction. The following deficiencies were noted during one or more of these reviews: unclean facilities and equipment, inadequate facilities, dirty rails which were contaminating carcasses, inadequate lighting, improper slaughtering procedures, and sewers backing up into the basement which resulted in odors permeating the plant.

On June 10, 1969, we accompanied the circuit officer in charge to the plant, and he rated 31 of 67 items reviewed as in need of immediate correction. Some of the deficiencies observed were:

- Rat feces were observed throughout the plant, including beef-boning areas and carcass coolers.
- Rats had chewed holes in the wooden cooler doors.
- Rat nests and a bird nest were observed in the plant.

--A live rat was observed in the tank house.

--Moldy meat scraps were accumulated behind a refrigerator unit in the cooler. Two packages of moldy meat were lying on a boning table.

--Work tables and equipment were dirty. In general, floors, walls, ceilings, and loading docks were dirty.

--Open doors and windows were not screened.

Comments by the plant manager indicated that unsanitary conditions at the plant had existed for some time. During a meeting at the conclusion of our visit, the plant manager stated that the rat problem had improved because in the past he had seen numerous rats each day and now only one or two. He stated also that in the past he had thrown away carcasses because the rats had eaten part of the carcasses during the night.

Although statements by the plant manager indicated that the unsanitary conditions and rodent problem had existed in the past, the 1967 and 1968 survey reports showed no evidence of rodent infestation in the plant. In addition, a meat-grading supervisor for this plant advised us that no reports on unsanitary conditions or rodent infestation had been received from the meat graders assigned to the plant.

After our visit, the circuit officer in charge recommended that consideration be given to withdrawing grading services from this plant on the basis of his opinion that it could not presently produce a wholesome product. As a result, meat-grading service was withdrawn from the plant on June 17, 1969.

- - - -

Because of the extensive unsanitary conditions at Plant G, we brought the situation to the attention of the Administrator of C&MS and raised the question as to whether the plant should be classified as producing a product hazardous to the consuming public. Subsequently, C&MS

identified the plant as a hazard to public health and notified State officials that action must be taken to eliminate the health hazard within 5 working days.

The Director of the State meat inspection program advised C&MS that members of his staff could find no way for plant management to bring the plant to a satisfactory condition within 5 days, that inspection services would be canceled, and that the plant owner had agreed to close the plant indefinitely with the intent to remodel to Federal specifications.

CHAPTER 4

CONCLUSIONS, RECOMMENDATIONS,

AND AGENCY ACTIONS

CONCLUSIONS

At 44 of the 48 plants we visited, animals were being slaughtered or meat and meat food products were being processed for sale to the consuming public under unsanitary conditions which could result in product contamination. At 35 of the plants visited, we observed instances of product contamination.

Although C&MS inspection personnel were enforcing some sanitation standards, the degree of enforcement varied from plant to plant, and the inspection personnel were generally lenient with respect to many unsanitary conditions unless product contamination was obvious. C&MS inspection personnel did not consistently reject for use equipment and plant areas or suspend operations in federally inspected plants when unsanitary conditions were found. Also, the C&MS circuit officers in charge did not consistently recommend the withdrawal of Federal grading services at nonfederally inspected plants when their surveys showed unsanitary conditions.

We believe that a primary cause for the lack of uniformity and leniency in enforcement was a lack of clear and firm criteria setting forth the actions to be taken when C&MS inspection personnel found unsanitary plant conditions.

Another reason for the leniency in enforcement, we believe, stemmed from weaknesses in C&MS's system for reporting on sanitation at the plants. Even though unsanitary conditions were reported, the reports generally did not show what action, if any, had been taken to correct the deficiencies. As a result, information was not readily available to C&MS management as to whether appropriate and timely corrective actions were required by responsible C&MS personnel.

After we brought this matter to the attention of the Administrator of C&MS, he agreed that substantial improvements were needed in the reporting system. A revised reporting policy statement was issued which provided that action taken or to be taken be an essential part of the weekly sanitation reports prepared by C&MS inspectors at federally inspected plants. In our opinion, however, this policy statement does not but should apply to other reports concerning sanitation, such as those prepared by Washington, regional, and circuit office personnel on their plant reviews.

Clear and firm criteria--setting forth the actions to be taken when unsanitary conditions are found--and improved reporting policies can provide a basis for improving C&MS enforcement of sanitation standards at meat plants. In the final analysis, we believe that the effectiveness with which such standards are enforced will be dependent on the resolve of C&MS personnel at each and every level--from the plant inspectors to the Washington officials.

RECOMMENDATIONS

We recommend that the Administrator of C&MS reemphasize to individual employees at all levels their responsibilities for the enforcement of C&MS regulations to ensure that meat and meat food products are wholesome and unadulterated.

To assist employees at all levels in carrying out their responsibilities, we recommend that the Administrator establish

--criteria setting forth specific conditions under which inspection and grading services should be suspended at plants in violation of C&MS standards and under which equipment and specific plant areas in federally inspected plants should be rejected for use until made acceptable, and

--a uniform reporting policy whereby action taken and to be taken will be a required part of all reports pertaining to observed sanitation deficiencies.

AGENCY ACTIONS

The Administrator of C&MS advised us by letter dated June 15, 1970 (app. I), that the conditions described in our report are of deep concern to the Department of Agriculture and that the Department is and has been determined to eliminate such threats to the wholesomeness of the Nation's meat and poultry products. He stated the belief that the emphasis and objectives of the major inspection improvement program already under way and now being intensified in C&MS are completely in line with and responsive to our recommendations. He stated also that much has been accomplished but much remains to be done.

With respect to our recommendation that C&MS reemphasize to individual employees at all levels their responsibilities for the enforcement of sanitation standards, the Administrator stated that a letter (dated June 2, 1970) had been directed to all Consumer Protection Program personnel by the Deputy Administrator for Consumer Protection clearly outlining inspection objectives and procedures regarding sanitation. He stated also that this letter assures each employee of full support for his efforts in enforcing sanitation standards. The Administrator included a copy of the letter as an enclosure to his comments. (See p. 55.)

The Administrator also stated that meetings had been held with regional directors, supervisory staffs in the field, and in-plant inspection staffs to strongly reemphasize the policy of continuously maintaining satisfactory standards of sanitation. In addition, he stated that within the next 2 months each major meat packer organization would be invited to send an appropriate committee to meet with C&MS for the purpose of reemphasizing meat inspection objectives and developing an educational program for their membership on the whole spectrum of meat inspection, particularly sanitation.

The Administrator advised us that C&MS's policy when unsanitary conditions are found to exist at meat plants, as recently reiterated to all inspectors, is:

- "a. Facilities, sanitation, and operating practices must be such that production of wholesome product, free of contamination is accomplished.
- "b. Deficiencies in an establishment that require correction, but do not immediately threaten the product, will be identified and listed for plant management. A timetable is established for corrective action.
- "c. If prompt and effective corrective actions are not accomplished as required to achieve clean and wholesome products, unacceptable portions of the plant or its equipment will be rejected or inspection withheld from the entire establishment."

To assist inspectors in carrying out this policy, he advised us that revised procedures, forms, and instructions had been issued to:

- clarify criteria for withholding or suspending inspection for cause,
- provide clear guides on responsibilities and actions to be taken when evidence of rodent infestation is found,
- sharpen up reviews of the adequacy of plant facilities and operations, by weighting the relative value of various items on plant review forms in order to give a more accurate overall evaluation of plant conditions,
- clarify sanitation requirements for nonfederally inspected plants to qualify for Federal grading service, and
- grant additional authority to Federal supervisory inspectors reviewing Talmadge-Aiken plants.

The Administrator also provided detailed information on enforcement actions taken as a result of the inspection

improvement program. This information indicates significant increases within the last year in the number of plants where (1) production was temporarily held up until necessary corrective actions were taken, (2) deadlines for improvements of facilities and equipment were issued, (3) Federal inspection service was formally suspended, (4) plants withdrew from Federal inspection because they were unable or unwilling to meet sanitary requirements, and (5) Federal grading service was withdrawn from nonfederally inspected plants for reasons associated with sanitation or wholesomeness of a product.

The Administrator stated that, although the record demonstrates progress during the past year in improving sanitation in federally inspected meat plants, the need for still further action is acknowledged. In this respect, he stated that a management study is now under way to determine improvements in administration. A specific objective of this study will be the establishment of clearer lines of authority and responsibility which the Administrator believes will have strong impact on carrying out our recommendation relating to improved reporting systems to demonstrate actions taken.

The Administrator provided us with the following report on the status of the 48 plants visited by us, as determined by recent C&MS plant visits.

- Federal inspection has been discontinued at five of the 40 federally inspected plants.
- Conditions of sanitation in 27 of the federally inspected plants have been improved and now meet C&MS sanitary requirements.
- Two of the eight nonfederally inspected plants ceased operations following withdrawal of recognition for Federal grading service.
- Four nonfederally inspected plants' operating conditions are now acceptable.
- In the remaining eight federally inspected plants and the two nonfederally inspected plants, action has

been taken to protect the product while the remaining needed plant improvements are being completed.

In concluding his letter, the Administrator advised us that C&MS is thoroughly committed to a policy of maintaining strict and continuous enforcement of adequate sanitation in all meat plants to ensure consumers a clean, wholesome product. He stated that every effort will be exerted to see that this policy is fully implemented.

- - - -

We believe that the actions already taken and the further actions outlined in the Administrator's letter, if fully implemented, substantially comply with our recommendations and will provide greater assurance to the consuming public that meat products are processed under sanitary conditions. We believe, however, that, even with the intensified enforcement actions planned by C&MS, continuing efforts of all C&MS personnel to require compliance with sanitation standards are vital to maintaining the integrity of the inspection program and ensuring the consuming public of a wholesome product.

CHAPTER 5

SCOPE OF REVIEW

We reviewed pertinent legislation, regulations, policies, procedures, and practices relating to C&MS's meat inspection activities. We examined C&MS plant review reports and correspondence concerning the violations of standards for sanitation and facilities during the period January 1967 to July 1969 for all federally inspected plants in one Consumer Protection Region and for selected plants in other regions, including Talmadge-Aiken plants.

For federally inspected plants, we also reviewed reports prepared by C&MS Washington reviewers on plant visits made by them during the period 1966 through 1969. Also, we reviewed reports and correspondence for all nonfederally inspected plants that received Federal grading services in July 1969. We interviewed C&MS employees responsible for the inspection, supervision, and administration of the Federal meat inspection program and reviewed applicable internal audit reports prepared by the Office of the Inspector General.

Our review was performed at the C&MS headquarters, Washington, D.C., at four of C&MS's eight Consumer Protection regional offices located in Kansas City, Missouri; St. Paul, Minnesota; Chicago, Illinois; and Dallas, Texas; and at selected circuit offices in these regions. We also visited, between May and November 1969, 40 federally inspected meat plants, including Talmadge-Aiken plants and eight nonfederally inspected meat plants that were receiving Federal grading services.

APPENDIXES



UNITED STATES DEPARTMENT OF AGRICULTURE
CONSUMER AND MARKETING SERVICE

WASHINGTON, D C 20250

JUN 15 1970

Mr. Victor L Lowe
Associate Director
Civil Division
General Accounting Office
Washington, D. C.

Dear Mr. Lowe:

Although we appreciate the opportunity to review and comment on your draft audit report entitled "Enforcement of Federal Standards for Sanitation at Meat Plants," we must admit that we do so with some distress. The conditions you describe in your review are of deep concern to the Department. We are, and have been, determined to eliminate such threats to the wholesomeness of this nation's meat and poultry products. For this reason we are most appreciative of the opportunity you have given us to see an early draft of your report and to discuss these findings with both your Washington and Kansas City offices.

The principal thrust of your report bears on the need to eliminate unsanitary conditions and to further clarify criteria for in-plant sanitation. It emphasizes the need to improve enforcement directed at conditions having an actual or potential threat to the wholesomeness of federally inspected meat products.

About a year ago, as a result of information obtained from investigations and plant review reports, it was clear that a major inspection improvement program was needed. This was instituted, is now underway and is being intensified. We believe its emphasis and objectives are completely in line with and responsive to the recommendations in your report. Much has been accomplished since then. Much remains to be done.

Your recommendations are to. (1) reemphasize enforcement of sanitation standards at all levels of individual responsibility to ensure production of wholesome and unadulterated meat and meat food products, (2) establish specific criteria for action to strengthen enforcement, and (3) provide for a reporting system to demonstrate actions taken.

With particular reference to the first listed recommendation, a letter has been directed to all Consumer Protection Program personnel by the Deputy Administrator for Consumer Protection, clearly outlining our inspection objectives and procedures as respects sanitation. Furthermore, it assures each employee of full support for his efforts in this regard. A copy of this letter is attached as Exhibit A.

In addition, within the next two months each major packer organization will be invited to send an appropriate committee to meet with us for the purpose of reemphasizing our meat inspection objectives and developing an educational program for their membership on the whole spectrum of meat inspection, but including sanitation in particular.

Other important steps already taken and further actions planned in line with your recommendations, and some of the results achieved, are as follows:

1. In May 1969 we commenced meetings with Regional Directors, with supervisory staffs in the field, and subsequently with in-plant inspection staffs. We have strongly reemphasized at these sessions the policy of continuously maintaining satisfactory standards of sanitation.
2. When insanitary conditions are found, inspectors are required to effect corrective action or temporarily hold-up the use of that part of the plant or its equipment causing product contamination until these conditions are corrected. The marked increase in the effectiveness of this policy is shown in Exhibit B. Suspension or withdrawal of inspection which forces plant closures is imposed when other means will not or do not bring about prompt and satisfactory improvements. Our policy in this respect, as recently reiterated to all inspectors, is:
 - a. Facilities, sanitation, and operating practices must be such that production of wholesome product, free of contamination is accomplished.
 - b. Deficiencies in an establishment that require correction, but do not immediately threaten the product, will be identified and listed for plant management. A timetable is established for corrective action.
 - c. If prompt and effective corrective actions are not accomplished as required to assure clean and wholesome products, unacceptable portions of the plant or its equipment will be rejected or inspection withheld from the entire establishment.
3. When it is determined that basic improvements of facilities and equipment are required, these are identified to plant management and schedules for satisfactory completion determined. Issuance of deadlines to plants where supervisory or other reviews indicated improvements were needed have tripled since May 1969 -- from an average of 22 per month for the first five months of 1969 to 68 per month for the following 10 months.

4. When plant management does not or cannot promptly correct objectionable conditions, inspection is formally suspended for the entire operation. Prior to June 1969, no such formal suspensions were made. From June 1969 to March 1970, there were 23 such suspensions.
5. In recent months, 79 meat and poultry plants have withdrawn from Federal inspection (most have closed) because they were unable or unwilling to meet sanitary requirements.
6. Two non-federally inspected (NFI) plants were removed from the approved list for USDA grading service in 1968 for reasons associated with sanitation or wholesomeness of product. For similar reasons 12 plants were removed from this list in 1969 and three in the first quarter of 1970.
7. Revised procedures, forms and instructions have been issued designed to:
 - * Clarify criteria for withholding or suspending inspection for cause.
 - * Provide clear guides on responsibilities and actions to be taken when evidence of rodent infestation is found.
 - * Sharpen up reviews of the adequacy of plant facilities and operations, and provide for a weighting of the relative value of sanitation factors in order to give a more accurate overall evaluation of plant conditions.
 - * Clarify sanitation requirements for non-federally inspected plants to qualify for USDA grading service.
 - * Grant additional authority to Federal supervisory inspectors reviewing plants operating under Talmadge-Aiken agreements.

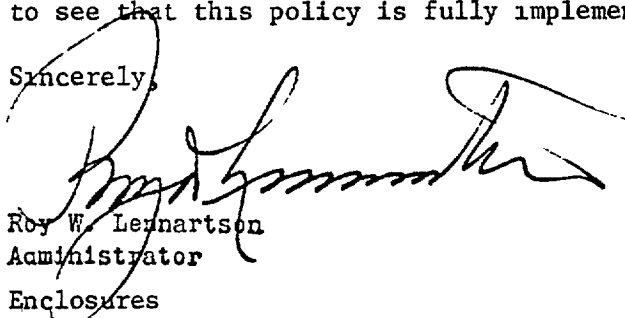
Although the record demonstrates progress during the past year in improving sanitation in federally inspected meat plants, the need for still further action is acknowledged. A management study is underway to determine improvements in administration. The establishment of clearer lines of authority and responsibility is contemplated. This should have a strong impact on carrying out your third recommendation relating to improved reporting systems to demonstrate actions taken.

Lastly, the current status of the 48 plants upon which your report was based has been reassessed by on-site visits in recent weeks. It was determined that:

- * Five of the 40 federally inspected plants in your sample have discontinued Federal inspection.
- * Conditions of sanitation in 27 of the remaining federally inspected plants have been improved and now meet sanitary requirements.
- * Two of the eight NFI plants ceased operations following withdrawal of recognition for USDA grading service.
- * In four NFI plants with USDA grading service, operating conditions are now acceptable.
- * In the remaining eight federally inspected plants and the two NFI plants, action has been taken to protect the product while the remaining needed plant improvements are being completed.

We are thoroughly committed to a policy of maintaining strict and continuous enforcement of adequate sanitation in all meat and poultry plants to assure consumers a clean, wholesome product. Every effort will be exerted to see that this policy is fully implemented.

Sincerely,



Roy W. Lennartson
Administrator

Enclosures



UNITED STATES DEPARTMENT OF AGRICULTURE
CONSUMER AND MARKETING SERVICE
WASHINGTON, D C 20250

JUN 2 1970

TO: All Consumer Protection Program Personnel

About a year ago, at a meeting with Regional Consumer Protection Directors, a plan of action was agreed upon to reemphasize the requirements for sanitation in meat and poultry plants under Federal inspection. The following basic criteria were established for implementing this plan.

1. Facilities, sanitation, and operating practices must be such that production of wholesome product free of contamination is accomplished.
2. Deficiencies in an establishment that require correction, but are not immediately affecting product, will be identified and discussed with plant management and a timetable established for corrective action.
3. If prompt and effective corrective actions are not accomplished as required to achieve clean and wholesome products, unacceptable portions of the plant or its equipment will be rejected or, if necessary, inspection withheld from the entire establishment.

Many plants have since made major improvements in their facilities and maintenance practices. There have been many instances where the use of all or a part of a plant or some of its equipment has been temporarily withheld pending proper clean-up or maintenance. In the past year, 24 meat and poultry plants have been temporarily suspended from all Federal inspection for longer periods because of insanitary conditions within these plants. However, I am greatly disturbed to have received recent reports of continuing situations still demanding action to assure adequate sanitation.

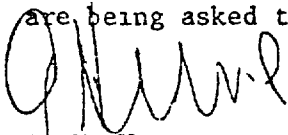
Some of you have expressed to me directly, and others indirectly, concern that should you take positive actions to correct such deficiencies you might not be upheld at higher levels.

Let me state, as emphatically as I possibly can, two things

1. C&MS and the Department will maintain its policy of requiring continuously adequate sanitation in all federally inspected plants.

2. It is the responsibility of inspectors and supervisors, at all levels, to see that this is done and C&MS and the Department will uphold and support actions required to discharge this responsibility.

We, of course, also fully recognize that the primary responsibility for maintaining required sanitation within plants and producing clean, wholesome, truthfully labeled meat and poultry products rests squarely with plant management. To further assure a mutual understanding of program requirements and responsibilities and consider how this information may best be communicated to plant management, packer organizations are being asked to meet with C&MS in Washington in the near future.

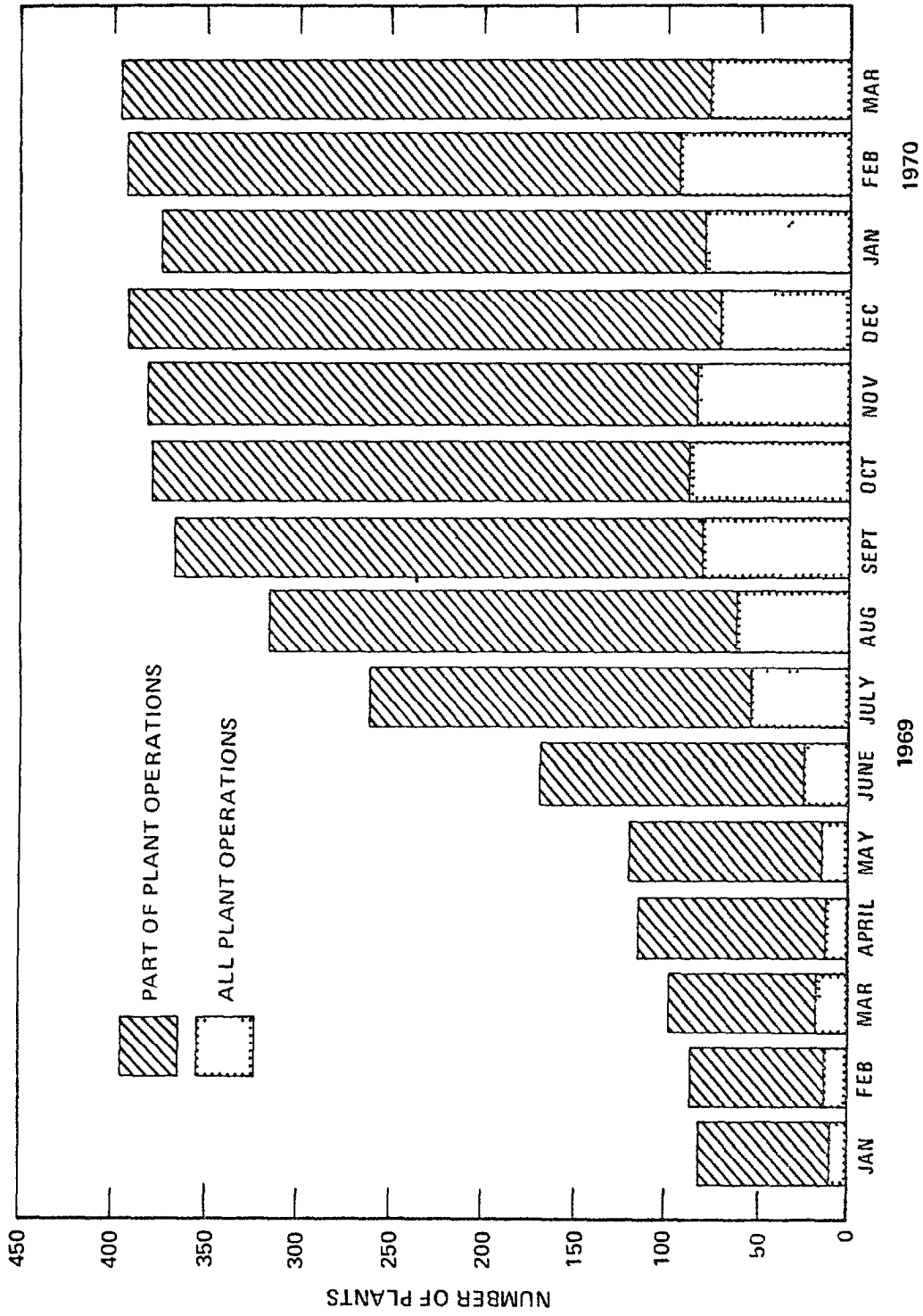


G. H. Wise
Deputy Administrator
Consumer Protection

Federally Inspected Meat and Poultry
Plants With Operations Held Up (Rejected)
Due To Unsanitary Conditions

Inspectors have the authority to temporarily withhold inspection from the entire plant or individual operations in a plant when unsanitary conditions are found. The attached chart shows by months the number of plants where inspection was withheld.

**NUMBER OF PLANTS WHERE OPERATIONS WERE HELD UP (REJECTED)
DUE TO UNSANITARY CONDITIONS**





UNITED STATES DEPARTMENT OF AGRICULTURE
CONSUMER AND MARKETING SERVICE

WASHINGTON, D.C. 20250

SUBJECT Application of Meat and Poultry Inspection Criteria

DATE May 14, 1969

TO Regional Directors
Consumer Protection Programs

For your information and guidance, the attached letter contains an example of insanitary conditions, inspection deficiencies, and improper operating procedures which were observed in a large, federally inspected establishment. These observations are prima-facie evidence that enforcement of the Sanitary and other regulations governing federally inspected meat establishments was grossly neglected.

We cannot and will not condone the existence of these or similar conditions in official establishments. The regulations concerning sanitation, inspection, and operating procedures are specific and must be accurately and uniformly applied in each and every establishment by inspectors and supervisors.

The Regional Director, his immediate staff, officers in charge, and all other supervisory personnel must and will be held accountable for achieving full compliance with all the meat and poultry inspection regulations. When it is reported that one in a supervisory capacity is not willing to discharge this responsibility, we will not hesitate to take appropriate action.

R. K. Somers
Deputy Administrator
Consumer Protection
Attachment

BEST DOCUMENT AVAILABLE



UNITED STATES DEPARTMENT OF AGRICULTURE
CONSUMER AND MARKETING SERVICE
WASHINGTON, D. C. 20250

May 9, 1969

Dear Mr. ***

Because of numerous reports concerning unsafe and insanitary conditions in your plant and reports of an uncooperative attitude toward the inspection program by plant management, several representatives of the U.S. Department of Agriculture visited your establishment on May 5 and 6. Operations and conditions in the slaughtering and allied departments, and in other major processing areas of the plant, were observed. The Department representatives discovered ample evidence of overproduction in relation to facilities available, little attention to basic sanitation in many important areas, a need for certain rearrangement of facilities in the slaughtering department, and of an urgent requirement for providing safe and easy access to the slaughtering department and associated areas.

Following the survey of the establishment by the Department representatives, a meeting was held in your office, attended by the following persons.

[See GAO note.]

I described the conditions observed that failed to meet minimum standards prescribed by Meat Inspection Regulations and other conditions requiring correction. You freely expressed assurances that all needed improvements can and will be effected promptly, and you stated that full cooperation by plant management with the inspection program can be expected.

BEST DOCUMENT AVAILABLE

GAO note: Material deleted by GAO.

The principal items needing attention are listed below, along with an indication of urgency and the time allotted for full correction.

General Conditions (not restricted to specific departments)

1. Walls, floors and ceilings need a vigorous, continuing program of repair, removal of scaling paint and thorough daily cleaning. This must be done immediately.
2. Rails in coolers throughout the plant are rusty, encrusted with grease and other materials. Product contamination from this source was observed. Such rails must be cleaned thoroughly, starting now and kept in acceptable sanitary condition hereafter.
3. Supporting columns in the hog coolers and elsewhere are, in some cases, clad with rusty metal. Carcasses and other exposed product contact these columns. Such columns must be clad with stainless steel or other suitable metal to allow daily cleaning. This work throughout the plant should not require more than 1 month from the date of receipt of this letter.
4. Many concrete door jambs in edible departments were not metal clad and were badly eroded from contact with carts and carcasses. Such jambs that may contact or contaminate product must be repaired and stainless steel clad within 1 month from the date of receipt of this letter.
5. Many processing departments, the employee welfare rooms, and the slaughtering and associated departments, including the inedible rendering areas, were observed to be in grossly insanitary condition because of the lack of continuing janitorial service during operating hours. Such janitor service must be provided immediately and accumulation of fat, meat and debris prevented at all times.
6. Certain employees handling exposed edible product, stuffer loaders and pork cutting department workers for example, wore clothing that appeared filthy. Effective immediately, outer clothing of such plant employees must be clean at all times.
7. In many coolers, exposed product in trucks was stored underneath hanging carcasses or product. Also, packaged product on flats or in trucks was stored beneath hanging

BEST DOCUMENT AVAILABLE

edible product in a similar manner. Contamination of exposed product in trucks from dripping hanging product and of carcasses or hanging processed product by contact with the wheels or outer surfaces of trucks was observed. Effective immediately, such practices that result in product contamination must stop.

8. Several pieces of equipment that utilized liquids under some pressure, for example, ham pumping scales and chitterling washing machines were modified by paper or cardboard shrouds or plugs to prevent escape of liquids onto adjacent areas or plant personnel. This unsanitary condition must be eliminated within 1 week from receipt of this letter.
9. Effective immediately, more attention must be given to the cleaning of trucks and carts used for edible product, including outer surfaces.

Slaughtering and Associated Departments

1. The slaughtering department is crowded and congested. It is doubtful that adequate facilities are available for handling the present 660 hourly rate slaughtered. However, a reasonable period, not to exceed 1 month, will be allowed for a demonstration that this rate of kill can be maintained with acceptable results with respect to both in portion and plant operations, including the handling and disposition of edible and inedible byproduct. Under no circumstances will carcass chain speed be permitted to exceed 660 carcasses hourly, except after major reconstruction and redesign of the slaughtering and allied departments. An effective device for assuring constant speed of the carcass conveyor must be provided as soon as possible and no later than 2 months from date of receipt of this letter. This device must be such that the actual rate of movement can be easily ascertained at all times by the inspector.
2. Safe, easy access to the slaughtering department must be provided for inspection personnel. This must be accomplished within 1 month from the date of receipt of this letter.
3. One month also will be allowed for appropriate changes in the present hog stunning methods to eliminate present inhumane and unsatisfactory practices. The procedure of chasing a number of unconfined hogs in a

BEST DOCUMENT AVAILABLE

large area and stunning up to 10 animals before hoisting any of them is unacceptable. Hogs must be confined for stunning to permit proper application of the electrodes and hoisted promptly after stunning. Failure to comply with these requirements will result in removal of your plant from the list of humane slaughterers. This will also be reported to state officials.

4. Within 3 weeks, a procedure must be in effect which assures that a competent plant employee will inspect hogs following the completion of shaving and before heading. Carcasses needing further cleaning will be tailed out by a plant employee before dropping the heads of such animals. This will require rail changes.
5. The steam and fog regularly present in the slaughtering department near the head work-up area and in the hog coolers must be eliminated within 2 weeks. This condition results in condensation on overhead structures with resultant product contamination and interferes with inspection, neither of which will be accepted.
6. Tanking operations must be altered to eliminate the objectionable accumulation in the inedible department of large numbers of barrels or trucks of intestines, bones, fat, etc., awaiting processing. If the present rendering facilities are inadequate for effecting these changes in procedure, excess material must be removed from the establishment as often as necessary during each day as required to prevent such accumulations and transported to other disposal facilities away from the plant. A period of 2 weeks will be allowed for demonstrating that existing tanking facilities are adequate.
7. Sanitation must be maintained in the inedible rendering department at all times, effective immediately. This is especially important in your establishment because of the intimate relationship of this department with edible product departments.
8. One of the very serious conditions observed involved improper tanning of hog carcasses at or preceding the rail inspection station. Effective immediately, plant employees must be provided to effectively remove cuts, bruises, and similarly affected tissues from carcasses preceding the rail inspector's station. One such plant employee should be positioned near the viscera inspectors on the carcass side of the viscera table.

BEST DOCUMENT AVAILABLE

9. The viscera table and carcass rail must be kept in synchronization continuously, effective immediately. A common drive for the table and carcass conveyor must be provided as soon as possible. This must not exceed 2 months from date of receipt of this letter.
10. Effective immediately, lungs must be freely slashed and thoroughly decharacterized before removal from the plant. The decharacterizing agent must be applied to all surfaces of each lung.
11. Effective immediately, gambrels and trolleys must be properly cleaned before each use.
12. Effective immediately, plant employees eviscerating hogs must be trained to remove livers without cutting into the gall bladder. Carcass tissues excessively contaminated with bile must be trimmed, not washed.
13. The supporting rail to steady hog carcasses at the head inspection position must be removed to allow turning of carcasses for inspection at this point. Two days will be allowed for this change.

Also discussed with you were certain provisions of the Federal Meat Inspection Act which make it a criminal offense for anyone to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person while engaged in or on account of the performance of his official duties under this Act. You stated that you were familiar with these and other provisions of the Act. Therefore, we do not anticipate any such action in connection with inspection personnel assigned to your plant. However, if such actions are reported to us, we will not hesitate to take appropriate action.

Copies of this letter are being furnished to our supervisory inspection personnel involved with operations in your plant who will closely follow and insist upon compliance with the various requirements listed. If you have questions about any item, please feel free to contact me. Thank you for your cooperation.

Sincerely,

BEST DOCUMENT AVAILABLE

PRINCIPAL OFFICIALS OF
THE DEPARTMENT OF AGRICULTURE
RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES
DISCUSSED IN THIS REPORT

	Tenure of office	
	From	To
<u>DEPARTMENT OF AGRICULTURE</u>		
SECRETARY OF AGRICULTURE:		
Clifford M. Hardin	Jan. 1969	Present
Orville L. Freeman	Jan. 1961	Jan. 1969
ASSISTANT SECRETARY, MARKETING AND CONSUMER SERVICES:		
Richard E. Lyng	Mar. 1969	Present
Vacant	Feb. 1969	Mar. 1969
Ted J. Davis	Sept. 1968	Jan. 1969
Vacant	June 1968	Sept. 1968
George L. Mehren	Sept. 1963	May 1968
<u>CONSUMER AND MARKETING SERVICE</u>		
ADMINISTRATOR:		
Roy W. Lennartson	Feb. 1969	Present
Roy W. Lennartson (acting)	Jan. 1969	Feb. 1969
Rodney E. Leonard	Dec. 1967	Jan. 1969
Winn F. Finner (acting)	Sept. 1967	Dec. 1967
Sylvester R. Smith	June 1961	Sept. 1967
DEPUTY ADMINISTRATOR, CONSUMER PROTECTION:		
Gilbert H. Wise	Aug. 1969	Present
Robert K. Somers	Sept. 1965	July 1969
DEPUTY ADMINISTRATOR, MARKETING SERVICES:		
George R. Grange	Aug. 1961	Present