

Hello. I'm Marty O'Conner, the Chief of Standards, Analysis and Technology Branch.

I'm going to cover some of the areas in the technical portion of the program, and specifically the animal welfare audit, documentation clarifications that we've done the last specifications.

Then more in-depth specification changes and finally, going to update some of the microbial fat analysis information from the ADL.

AMS employs a multifaceted strategy to guide its Animal Welfare Program and audit efforts.

Contractors and subcontractors will be submitting their animal welfare plan to AMS for a desk audit to ensure that they have addressed all of the requirements imposed by AMS and will then be able to participate in the Federal Purchase Program.

Once the Animal Welfare Program has successfully passed the desk audit, an onsite capability assessment will be conducted to ensure that the company does what it says and says what it does. In other words, we verify your written plan against your action.

Contractors and subcontractors must comply with all FSIS regulations and notices. And then, too, you'll also have to participate in contractual requirements that are devised and published by AMS Livestock and Seed Program for the Federal purchase activities.

AMS requirements are apart and separate from those required by FSIS and must be addressed in your technical proposals to meet the specification requirement. The desk audits are conducted by the contracting officer's technical representative.

Those are the people in my branch, the Standards, Analysis and Technology Branch, to evaluate those and then submit their written report to (Duane's shop) for his consideration of our evaluations.

Once it is approved as adequate, then an onsite capability assessment is conducted by the audit review and compliance branch.

All program staff work is done in concert with the contracting officer of the Commodities Procurement Branch, (Duane), to ensure that firms are meeting the applicable requirements.

As you can see, notification to initiate the plan last year was done by October 1. And implementation was required January 1 of this year.

Most firms that submitted applications during the period did a good job of providing us the information that we needed with a few minor tweaks and twists that were communicated back and forth through the discussion process.

But overall we felt it was a good program and the people were very knowledgeable of the way to approach the documentation of their plan.

Of course with the influx of the plans in that short period of time truncated the timeline that we had numerous products in front of us in trying to evaluate them and communicate with you folks out in the fields so that you could further refine your program and submit them back to us.

But we still stayed on schedule and I think we met everybody's expectation as to turn-around times and discussions on the product itself.

The contracting technical representative maintains these plans, it is less rigorous and becomes established of a proven capability of onsite capability assessments by the (ARC Branch).

In other words as we progress down this road we won't be inundated with an influx of a lot of programs in a short period of time.

Those that are already established will periodically have to have the maintenance reviewed to them and then others that have corrective actions to be conducted will be assigned to us.

But there won't be that large volume of things that need to be undertaken in a short period of time.

The animal welfare audits supplier revision desk audits, desks and onsite capability ought to follow animal welfare requirements.

Desk audits are conducted when an animal welfare plan is initially submitted by you to us for consideration or when revisions occur to your plan.

Onsite capability audits are perpetuated from those desk audits as well as being performance based.

The performance based criteria are discussed in the requirements contained in that document. Basically, the better you perform the less frequent the audit.

Conversely, if less than expected performance is observed, a more stringent timeline is established and audits conducted accordingly.

Firms have been receptive to the needs of monitoring their animal welfare requirements as a component of the AMS Program has been established. And we felt it was a good first approach to this issue.

Correctively plans submitted by firms were an acceptable form with some minor revisions needed to meet the prescribed requirements. But overall, a job well done.

On the average, each plan was subjected to three desk audit revisions prior to being considered for an onsite capability audit. We felt this about right given the subject matter and being a new requirement for our program.

The standards analysis and technology branch along with the (ARC) branch keep independent databases to track and review audit findings.

The (SAT) branch database document which firms have submitted animal welfare plans and have been approved and referenced for an - excuse me, has been referred to have a capability assessment conducted by (ARC).

The (ARC) branch database documents the onsite capability audits conducted for each of the firms and the frequency that they were conducted.

The approved animal welfare plan and onsite audit reports are openly housed in AMS service website based program for Internet service.

As you can see, to date 28 firms have been approved for animal handling plans and have been successfully audited. These firms participate in one or a multitude of procurement programs offered by AMS.

As you can see by the following slide, there's a multitude of different programs that these animal welfare programs feed into, whether it's this canned stew, fresh boneless beef, frozen picnics ham, boneless, even a canned chili without beans has a provider in beef round roast.

Fully cooked pork patties or is that a specialty item that have product available.

Now I'd like to get into some of the terms that we use in discussions and some clarification that's been requested through the year on some of the terms that we use.

Basically, TRS versus IDCR, good acronyms for the government. However sometimes they're not clearly articulated as to what our expectations are for the program.

A TRS or a Technical Requirement Schedule is used to describe a characteristic of an agency-specific product to be purchased. These products have unique requirements that are not commonly found in the marketplace.

This design process specification does not only describe what the product should be it also describes who it should be manufactured.

Our TRS GB and BB ground beef and boneless beef are examples of this, as well as the statement of work for the AMS designated laboratory program.

The IDCR or Item Description Checklist of Requirements is used to describe products to be purchased that are commercially available in the marketplace. This is a performance-based requirement.

And it describes what the product should be, not how it should be produced. The IDCR has a fully-cooked pork patty and beef round roasts are examples of the specification or classification.

All right, now let's get into the difference between a technical proposal and a production plan.

A technical proposal, the contracting officer will request that a contractor or his supplier through the contractor submit a

technical proposal when purchasing product under the TRS type specifications.

A technical proposal will contain a detailed description of the manufacturing processes necessary to produce an agency-specific product.

We require a technical proposal to be delivered in the planned, do, check, and act format.

This format allows the contractor or the subcontractor, in some situations, to describe through prescriptive steps the manufacturing processes involved. In other words the planning and the doing is contained in that part.

In addition to describing the manufacturing process, the technical proposal also allow the contractor to describe the quality assurance measures taken to ensure the product meets specification requirements.

That would be the checked step. And the corrective and preventative action steps taken when a quality assurance action reveal non-conforming product and of course that would be the act.

The use of a technical proposal to describe a contractor's process usually relies more heavily on audit-based verification through the (ARC) branch with meat grading providing monitoring and verification authority in a limited format. Detailed supporting documents are usually required with this technical proposal.

For a production plan, the contracting officer can request that a production plan be submitted when purchasing commercially available products under an IDCR type specification, somewhat different than the technical proposal approach as seen.

Unlike the technical proposal, a production plan does not have to be created specifically for a USDA program. The processor could build a production plan from already existing documents that describe their commercial production process or processes.

The production plan in contrast with the technical proposal use a generic statement that implies quality assurance that insure the IDCR requirements are being addressed and met.

The use of a production plan to describe the contractor's process is also usually accompanied by a higher level of verification activities. So we have to verify, but yet you telling us how your plan is being conducted.

For the production of most IDCR-type products meat grading is the main verification activity authority. A good commercial product can be provided as long as the descriptive nature clearly demonstrates the process of which it is produced under.

Okay, now let's get into some fairly minor specification changes that we have in clarifications more precisely. In section 3B-2E-1A, for all you that is the boneless beef requirements area.

We just clarified that the silver skin that needs to be excluded is from the outside round. In section 3B-2, fat limitation, AMS

**changed the fat sampling size unit clarification for coarse and fine
- excuse me, for fine ground beef requirements.**

And in precise verbiage, for the first 20 production lots, an AMS agent will direct the contract that's to randomly select each consisting of four sampling units.

For finely ground beef, each sampling unit shall not exceed two pounds and for coarse ground, shall not exceed ten pounds. Those are the two clarification points within that area.

In Appendix B the process capability status change clarification was added to insure that everybody understood our expectations in a unified approach.

Basically, what we wanted is that a supplier and a contractor must declare to the contracting officer that a process is not capable and then have 20 consecutive lots resulting that meet the process capable requirements.

So really a two-step process. First, the company must declare to the contracting officer that they have changed statuses and then they have 20 consecutive results that meet the process capable criteria.

Change in status begins after a cause and effect analysis has been performed and corrective actions have been implemented. So it's not an immediate change over to that activity, it's after change has occurred and is documented.

The material requirements for fresh-chilled boneless beef, for domestic origin harvest requirements, the harvester quality control program must be documented and have received a satisfactory on-site capability assessment by the (ARC) branch.

Basic clarification on that, making sure everybody clearly understands that and that's in section 3A-1.

In section 3A-2 B1, the objectionable material classification talks about the sciatic nerve location, so it just basically says lies medial to the outside round, so that there is clear understanding of what nerve we're talking about when we're asking you to have that removed.

And again, in conditional status, the verbiage is pretty much the same as previously talked about in the TRS GB, that the contractor or sub must declare to the contracting officer that the process is not capable, and then have those 20 consecutive results that then meet the criteria for process capable.

And also, changes in status begin after the cause and effect and implementation of the corrective and preventative actions.

Okay changes. The IDCRs, basically what we try to do is bring all of the IDCRs into a more cleaner format and address things in a logical step-by-step manner and make sure that all of them reference the same criteria, or at least the same headings and maybe not the same criteria.

So general revisions to the process include reference to AMS animal welfare requirements, a new requirement as of January of

this year, update meat component material requirements, restating metal detection requirements and make sure it's uniform from specification to specification or IDCR to IDCR, update labeling requirements, update the sealing requirements to make sure all of the specification have that same sealing requirement, and revise product assurance sections.

Warranty and complaints resolution and nonconforming product must be addressed. They're basically making all of these IDCRs more consistent with each other.

These revisions should not directly affect any of the contractor's current processes but strongly encourage them to go back and review those procedures to make sure that they do have a documented system in place that addresses each of those points.

Okay some further changes that we have revised that year, again specifications and sales of the fully-cooked cured ham product, the canned beef stew, the canned bison stew, canned chili without beans, canned luncheon meat, and canned beef and pork.

In that canned beef and pork, we are discontinuing the tomato sauce based items. And, again as in other specification, all changes are noticed with blue italic font for ease of verification that what was changed compared to the last requirement.

Further, cooked beef and pork items were changed, the fat and sodium is looked to be even further reduced, crumble tolerance and SPC approach into verifying that, and other revisions noted earlier.

The fresh pork and leg roast and other revisions noted in earlier revisions. In the water food IDCR, other applicable revisions were also noted as for consistency.

We're currently researching what would be an acceptable reduction in fat and sodium in those items and are working with a food nutrition service to identify those end points that'll help us establish the Secretary's initiative to address those issues within our program.

We're looking for some good input from any of you that have some suggestions for us to address that, either product-wise or specific specification-wise. We'd appreciate any of that input.

And we talked earlier about the crumbles tolerance. We're considering a specification limit for crumble size. There's been concerns with fines and our relationship to burnt and or scorched flavor. So again, we were looking to make a better end product at that point.

And now I want to move into the ADL update on micro and fat and improvement in trends. Look at micro biological testing results for E-coli 0157H7, salmonella. Take a look at it in a historic perspective, and then look at some of the results from our fat testing.

AMS ground beef program for January 08 to 09, again no incidences of E-coli 0157H7 in ground beef. This was the fourth year in a row that we had no incidents in finished product.

For the TRS GB on the raw materials program, we had 5 positive results found in that boneless beef, that's 4/100% incidents out of the 13,856 test results. The FSIS presence for that same time period was about 0.68.

For our boneless beef TRS GB, there was about a .7% incident rate for salmonella. In the finished ground beef, incidents for salmonella was 0.9. And again, the FSIS baseline data showed us they were at about 1.28 for years '05 through '07.

To conclude, we've been very successful in sorting out salmonella, haven't we? Boneless beef, we had 9832 tests, 7 lots rejected for positive results, again a .7 incident rate.

Ground beef, 1400 tests, 14 lots, and that's from clean-up to clean-up, that's a .9 incident, again both under the baseline that FSIS we compared with and we feel that, you know, we're doing a good job.

There's always room for improvement and we want to continue improve it, but we do want to tip our hats to you for addressing these issues.

But we have to be very cognizant that at any point a breakdown could be seen and it could impact our program.

So we ask your diligence in conducting that and make sure that we continue on the trends that we have in the past in supplying a very good product for the school lunch program.