

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
WASHINGTON, DC

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<b>FSIS NOTICE</b>	33-12	5/23/12
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**CONDUCTING WEEKLY MEETINGS IN EGG PRODUCTS PLANTS**

**I. PURPOSE**

This notice provides instructions to Inspection Program Personnel (IPP) at egg products plants on how to conduct and document a weekly meeting with plant management.

**II. WEEKLY MEETINGS**

A. IPP in egg products plants are to conduct weekly meetings with plant management to discuss topics that could affect food safety and the plant's ability to meet regulatory requirements.

B. The purpose of the weekly meetings is to provide an opportunity for IPP to bring matters that bear on the egg products plant's on-going compliance with FSIS requirements to the attention of plant management. These meetings should benefit both IPP and the plant. However, discussion of issues during the weekly meeting is not intended to replace documentation of noncompliances. Moreover, the fact that an issue is not discussed at the weekly meeting does not mean that the issue could not become the subject of a noncompliance record (NR).

C. These weekly meetings are an opportunity for the plant to share information regarding its operations, such as facility improvements and changes to its food safety systems. Weekly meetings also afford FSIS an opportunity to inform plants of topics of discussion that could include trends regarding repetitive noncompliances or findings that are not regulatory noncompliances but that could, over time, become noncompliances.

**III. POSSIBLE TOPICS FOR DISCUSSION**

A. A wide variety of topics can be discussed at the meetings, including individual noncompliances, developing trends of noncompliance, and findings by IPP that do not represent regulatory noncompliance but that need to be brought to the attention of the plant. For example, discussion of information from external sources, such as customer or consumer complaints, can provide information to alert plant management about a safety risk or about other information that is relevant to the plant's food safety system.

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**DISTRIBUTION:** Electronic

**NOTICE EXPIRES:** 6/1/13

**OPI:** OPPD

B. The list in paragraph C, below, provides additional examples of topics that IPP may find appropriate for discussion at the weekly meetings. Given the range of the issues confronting FSIS-regulated plants, it may be difficult to discuss all of the topics that either FSIS or the plant wishes to address during any one weekly meeting. Therefore, these topics should be discussed as they arise.

**NOTE:** The list is not all-inclusive and is not intended to be a checklist or to be used as a checklist. What is most important is that IPP communicate with the plant about any topics that relate to food safety issues and that could affect public health.

C. Possible topics of discussion include, but are not limited to:

1. In-plant observations, for example:
  - a. Individual NRs;
  - b. Developing trends of noncompliance (e.g., noncompliances that are somehow associated with, or indicate a trend of, noncompliance); and
  - c. FSIS findings that do not rise to the level of noncompliance but that warrant discussion (e.g., less than perfect conditions that may, if not addressed, become noncompliances).
2. Issues and information that the plant wishes to share;
3. Agency issuances, for example:
  - a. Policy clarifications published in [askFSIS](#);
  - b. New, revised, or amended [FSIS Directives](#), [FSIS Notices](#), [FSIS Compliance Guides](#), and [Import or Export policies](#);
  - c. New [PolicyPoints](#) PowerPoint presentations that promote a uniform understanding of FSIS issuances; and
  - d. [Small and very small plant outreach](#) information.
4. Information regarding FSIS sampling:

Results received through Laboratory Electronic Application for Results Notification (LEARN) for *Salmonella* or residue testing;
5. Information related to the plant's production, for example:
  - a. Plant testing results that indicate changes in the plant's control of its process (e.g., an increase in the presence of enteric pathogens of human health concern such as *Salmonella* spp., *Listeria monocytogenes*, or *Staphylococcus aureus*);

- b. Changes to the plant's production practices, including changes to the types of products produced, processing methods used, or other changes, such as product flow, sanitation measures, equipment configuration, or treatment of product, that could impact the plant's food safety system; or
  - c. [New Technology Summaries](#) (e.g., "No Objection" letters or regulatory waivers) issued to the plant and available through the FSIS Intranet. This discussion would include a mutual understanding of specific process parameters or critical factors that are addressed in the "No Objection" letter or waiver.
6. Information from external sources, such as:
- a. Complaints from consumers or plant customers (e.g., institutions such as hospitals or nursing homes, restaurants, schools, grocery stores, distributors, or wholesalers), if available; and
  - b. Notification of current recalls affecting eggs or egg products received by the plant or product produced by the plant. Further areas for discussion may include:
    - i. Any required follow-up FSIS testing;
    - ii. Any plant testing (e.g., hold-and-test) or hold and test requirements for egg products produced from shell eggs diverted, per FDA regulations, for processing in an egg products plant;
    - iii. Any planned actions associated with the recalled product that has been received by the plant; and
    - iv. How plant management can use information from recalls of products similar to those produced at the plant as a basis for improving its own operation.

#### **IV. DOCUMENTING THE WEEKLY MEETINGS IN A MEMORANDUM OF INTERVIEW (MOI)**

A. The FSIS employee who attends the weekly meeting is to take notes of the meeting and to document the following information in a MOI:

1. Who was present at the meeting;
2. Date and time of the meeting;
3. Plant management's responses to FSIS findings that do not rise to the level of noncompliance but that warrant discussion (e.g., less than perfect conditions); and
4. All issues or topics discussed.

**NOTE:** In the event that no issues are identified for discussion at the weekly meeting, IPP are to document that fact on the MOI and provide a copy of the MOI to plant management.

B. Plant management is not obligated by regulation to attend or participate in weekly meetings. If plant management refuses to attend or to participate after notification by IPP that FSIS will be conducting weekly meetings at a mutually agreed to time and location, IPP are to document that fact on the MOI and provide a copy of the MOI to plant management. IPP are also to notify their immediate supervisor of the plant's refusal.

C. IPP in multi-inspector/multi-shift plants are to seek guidance from the Frontline Supervisor (FLS) to determine how to conduct weekly meetings so that IPP from all shifts have an opportunity to conduct and participate in the meetings.

D. IPP are to maintain a copy of the MOI in the official government file and provide a copy to plant management.

E. IPP are to advise the plant that if it objects to the content of the MOI, it may inform the inspector, either orally or in writing, or can bring its objections to other Agency officials in the supervisory chain. IPP are to document the objection, if presented orally, on the MOI, or if written, attach the objections to the MOI. IPP are to reference the attachment in the MOI and provide a copy to plant management.

## **V. SUPERVISORY PERSONNEL RESPONSIBILITIES**

A. Supervisory personnel (that is, any Office of Field Operations (OFO) personnel who supervise IPP assigned to egg products plants) are to discuss this notice with IPP assigned to egg products plants to ensure that IPP understand their role in conducting weekly meetings.

B. Supervisory personnel are to refer to the current version of the [Guide for Conducting In-Plant Performance System \(IPPS\) Assessments](#) for additional guidance and instructions.

Refer questions regarding this notice to the Policy Development Division through [askFSIS](#) or by telephone at 1-800-233-3935



Acting Assistant Administrator  
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