



## HACCP-Based Inspection Models Project

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### Background

The HACCP-Based Inspection Models Project (HIMP) was developed by the Food Safety and Inspection Service (FSIS) to produce a flexible, more efficient, fully integrated meat and poultry inspection system. The HIMP system, in contrast with the traditional inspection system, focuses more control for food safety and other consumer protection activities on the establishment with Agency personnel focusing on carcass and verification system activities. FSIS expects this system to yield increased food-safety and other benefits to consumers, and will permit FSIS to deploy its in-plant resources more effectively.

In 1997, FSIS, first announced plans in the "[Pathogen Reduction; Hazard Analysis and Critical Control Point Systems](#)" (PR/HACCP) final rule (61FR 38806; July 25, 1996) to develop a project and test new models for inspecting certain meat and poultry products. The HIMP project was initiated in July 10, 1997 Federal Register Notice, "[HACCP-Based Meat and Poultry Inspection Concepts](#)". The HIMP notice requested public comment on the design and development of new inspection models for the slaughter and processing of young, healthy, uniform animals under HACCP systems.

There were also numerous public meetings held to solicit public input and comment on the project.

Based on the responses to the Federal Register Notice and input from public meetings, FSIS developed inspection models for the selected market classes and made slaughter process control an industry responsibility subject to FSIS carcass and verification inspection. The models would enable FSIS to:

- maintain and enhance the food safety and other consumer protection benefits of the current carcass inspection system;
- effectively and efficiently oversee, evaluate, and verify industry implementation of the PR/HACCP regulations.

After outlining the objectives the Agency hoped to accomplish with the project, FSIS solicited volunteer plants to participate.

FSIS only solicited volunteers from plants that slaughter market hogs and young poultry (including young turkeys) since these classes of animals are composed typically of young, healthy animals. The paper "[HACCP-Based Inspection Models Project: In-plant Slaughter](#)" outlines the establishment process control responsibilities and FSIS inspection activities that are carried out during the in-plant phase of the project, and described the microbial and organoleptic evaluation procedures which the project team will carry out. Under the program, plant employees conduct anatomical and pathological examinations of carcasses, and FSIS inspectors oversee, evaluate, and verify the effectiveness and reliability of the establishments' slaughter process controls.

### Project Design and Data Collection

### List of Participating Plants

The list of plants participating in the HACCP-based inspection models project.

### Data Collection (PDF only)

- [HIMP - Young Chicken Inspection](#)

Young chicken inspection data collected in plants participating in the HACCP-based inspection models project.

- [HIMP - Young Turkey Inspection](#)

Young turkey inspection data collected in plants participating in the HACCP-based inspection models project.

- [HIMP - Market Hog Inspection](#)

Draft of market hog inspection data collected in plants participating in the HACCP-based inspection models project.

The HACCP-Based Inspection Models Project is composed of two phases: (1) the Baseline Phase; and (2) the Models Phase.

During the Baseline phase the Research Triangle Institute (RTI), an independent consulting firm, collects organoleptic and microbial data, which indicates the accomplishments of the plant's current traditional inspection system. The Models phase consists of a Transition period and a second data collection period. At the end of the Transition period, when both the volunteer plants and the Agency have made any necessary adjustments to procedures, data are again collected in order to evaluate the achievements of the Models phase and the plants continue to operate under the new procedures as Model plants.

Additional collected data is added to the existing data to establish national performance standards for plants slaughtering each of the market classes included in the project.

The Research Triangle Institute (RTI) collected Baseline data in 16 young chicken plants, 5 market hog plants, and 5 young turkey plants between 1998 and 2000. Over a six-week period, 300 microbial samples were collected and analyzed for Salmonella and for Generic E. Coli in each plant. Similarly in each plant, 2000 carcasses were scored for a variety of organoleptic defects, over a five week period.

FSIS developed and published performance standards on November 2, 2000, for each species involved in the project using the collected data. The performance standards specific for each plant participating in the project provided a scientifically valid measure by which changes in food safety and other consumer protection data can be assessed.

The project involves new roles and responsibilities for participating plants. Each plant must modify its HACCP plan to include at least one critical control point addressing food safety diseases and conditions. In addition, each plant developed a process control plan to address other consumer protection concerns that are not food safety related, such as removing bruises and other quality defects.

New roles for FSIS inspectors have also been developed. To meet these roles inspectors are given two weeks of HACCP training and one week of carcass and verification training. Supervisors are also trained in Statistical Process Control.

With HACCP and other process control programs in place, plants will identify and remove from the slaughter production process carcasses and parts of carcasses that are unacceptable because they are diseased and unwholesome. When volunteer plants assume these process control responsibilities, the FSIS inspection team will be able to implement new slaughter inspection procedures that verify the effectiveness of the plant's modified HACCP and new process control plans.

In pilot plants, slaughter inspection will consist of two types of procedures: carcass inspection and verification inspection.

Carcass inspection accomplishes post-mortem inspection of each carcass after the plant has completed carcass sorting activities. The carcass inspector is stationed on the line at a fixed location and completes the critical determination for application of the marks of inspection.

The verification inspector takes samples of products and plant records and carefully examines them. Verification inspection focuses on the HACCP and process control plans and whether the plant is meeting relevant carcass performance standards.

The Research Triangle Institute (RTI) collected data again after the plants and FSIS had initiated the models phase. RTI has collected microbial and organoleptic models data in 16 young chicken plants and 3 market hog plants from September of 2000 to December of 2001.

FSIS has also collected verification data on the project when a plant enters the model phase. As of this date, FSIS has collected over 1 million samples in Food Safety and 350 thousand samples for the Other Consumer Protection categories. All data collected shows improvement.

Currently the project has 19 Young Chicken plants, 3 Market Hog Plants, and 2 Young Turkey Plant in the models phase of the project. The pending list of Young Chicken plants to enter the project has increased to over 30 plants. Also another Market Hog plant as well as 2 more Young Turkey plants will enter the project in early 2002.

#### **Court Case**

In September 2001 the American Federation of Government Employees (AFGE) filed an appeal to the District Court decision and a new panel of judges were appointed as panel members for the

case. The Agency and AFGE also filed briefs.

On Friday, January 11, 2002, the United States Court of Appeals for the District Circuit heard oral arguments in the case of the AFGE v. Ann Veneman, et al. (i.e., the Department of Agriculture). A Justice Department attorney represented FSIS arguing that the HIMP system has been redesigned and is in compliance with the statutes and the prior opinion of the court. The Agency is awaiting the ruling of the court and has been advised that their decision could be rendered within a few months.

### Conclusion

FSIS is continuing the HACCP-Based Models Project because the Agency believes that the project has been shown to improve food safety and other consumer protections and expects to publish a proposed rule. The new models capitalize on the food safety and other consumer protection gains garnered by the HIMP project thus far, while still meeting the demands of the inspection laws. Under the Models Project, FSIS is requiring improvements in the protections that are currently achieved under the traditional inspection. Data collected from this project show significant improvements in both food safety and other consumer protections.

*Last Modified mar 24, 2015*



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