

### **Wednesday, August 23, 2017: Demonstration for Regulators**

The primary message conveyed by regulators at the demonstration was that in the case of poultry processing operations that are exempt from CDFA or USDA bird-by-bird inspection, the fundamental expectation by both agencies is that *these activities are conducted under sanitary standards, with practices and procedures that produce poultry products that are sound, clean and fit for human food*. In other words, the precise techniques, facilities and equipment employed in processing the birds is open for producers to determine, so long as the finished product is wholesome and safe for consumption.

In general, regulators from all levels were pleased with the practices and equipment on display. Representatives from the CDFA-Meat, Poultry & Egg Safety Branch (MPES) stated that the trailer being used during the demonstration was very nearly compliant with expectations for a fully licensed CDFA facility.

The CDFA did recommend a few upgrades/modifications to the trailer that would get it closer to a licensed plant:

- Addition of floor drains and sloping floor to carry wastewater (not solids) to either a holding tank or other locally/regionally approved method of disposal
- Proof of bi-annual tests of water showing potability
- All pipes/conduit delivering power and water to workstations should run on the outside of the trailer to avoid providing lodging-points for organic material and pathogens
- Overhead lighting should be with removable fixtures that can easily be taken out to facilitate thorough cleaning.
- Better control for excluding flies, etc. via screens (at back) or sliding window (passthrough from slaughter area)

The CDFA representatives also offered to work closely with any producer who wants to “graduate” from exempt status and pursue a state license for their operation.

CDFA representatives also offered a few suggestions for any farmer or rancher conducting poultry processing on their property:

- Maintain the sharpest possible edge on knives used during slaughter. You should be able to cleanly sever the two carotid arteries with a single cut to each.
- Anyone participating in poultry processing should be healthy and conduct a quick self-examination to identify any cuts or other open wounds. No one who represents a potential risk of transmission of disease should be part of the processing activities.
- Maintain clear records of all poultry meat processing and sales conducted on your farm. If your operation were ever subjected to review, you would need to demonstrate that you are keeping to the limits around animals processed and the channels through which they are sold.

Some questions from the Tuesday training were raised and answered by Wednesday’s collected group:

**Question:** Is a CDFA-licensed poultry plant subject to any caps on the number of animals processed?

**Answer:** Potentially, yes. Any poultry plant that is not USDA-inspected must comply with one of several [USDA exemptions](#). Most of these exemptions come with a cap of 1000 or 20,000 animals, but some such as the “Retail Store” exemption do not. Any operation that chooses to operate with just a CDFA license must comply with the cap and any other restrictions associated with their specific USDA exemption.

**Question:** Is there a definition of “family” as it relates to the CDFA exemption and requirement that only operations using family members can sell at farmers markets?

**Answer:** CDFA representatives at Wednesday’s demonstration simply referred to family as “people related by blood or by marriage”.

**Question:** Can you use any kind of bag or container to package your ranch-processed poultry?

**Answer:** According to EHS and CDFA representatives at the demonstration, any packaging must be FDA approved for contact with food. Additionally, if you are selling fresh poultry products, you should be using materials that allow for the appropriate level of oxygen transmission. Plastics of 3millimeter (like the bags we used during the Tuesday training) work well. Thicker plastics generally do not allow for sufficient oxygen transmission. If you are freezing the product straightaway and selling it frozen, this is not a concern.

**Question:** Is the cap on animals processed (1000 or 20,000) measured in chicken-equivalents? (e.g. 1 turkey = 4 chickens, so you can only process 250 turkeys and remain under the 1000 cap)

**Answer:** No. The idea of animal equivalents in the context of these exemptions is an outdated concept that the USDA does not use any more. If you are operating under a USDA exemption that allows you to process up to 1000 animals, you can process 1000 chickens, turkeys, geese, etc. The exact type of animal is irrelevant. Note: For the purposes of Marin County land use, Poultry Processing also includes rabbits. Neither the USDA nor CDFA place any cap on the number of rabbits you can process under their exemptions. As such, the only limit on the number of rabbits is the 20,000-animal cap included in the recent amendments to Marin County’s Development Code.