the basis of each establishment's hazard analysis.

The proposed sanitation SOP's, antimicrobial treatment, cooling, and microbial testing requirements are compatible with and establish important parts of the foundation for establishments' subsequent adoption of HACCP procedures. It is expected that HACCP controls will give establishments the flexibility to meet the objectives reflected in FSIS's existing requirements for meat and poultry products. Once HACCP systems are integrated fully into all establishments, many existing regulations may be redundant. Anticipating the implementation of HACCP proposed in this document, FSIS has initiated a review of existing regulations, with the intention of removing those no longer needed, as well as of ensuring that regulations that remain are sufficiently flexible to be HACCP-compatible. FSIS invites comment on which regulations should be eliminated or modified. Even now, it may be possible to identify means to achieving prescribed regulatory ends that are as effective as the means set forth in current regulations—that are, in other words, "equivalent" to provisions set forth in regulations. FSIS invites comment on specific regulations for which such performance standards might be appropriate, either immediately or upon implementation of HACCP.

A. Transition to HACCP

The following is a discussion of regulations being proposed which, together, are intended to reduce significantly the level and frequency of consumers' exposure to foodborne illness associated with pathogenic microorganisms and other biological, chemical, and physical hazards in meat and poultry products.

The transitional regulations proposed in this document would be made effective 90 days after publication of the final rule (near-term initiatives). The proposed HACCP requirements would be implemented in phases during the three years following the publication of the final rule. As noted above, the near-term initiatives are designed to reduce the level and frequency of consumers' exposure to pathogenic microorganisms now, pending the more comprehensive controls that will be in place in each establishment under the proposed HACCP regulations.

The proposed regulations, roughly in order of their sequence in slaughter and processing operations, are as follows:

• A requirement that all federally inspected establishments develop and

adhere to written standard operating procedures (SOP's) specifically relating to direct contamination or adulteration of product;

- A requirement that slaughter establishments use an antimicrobial treatment on all carcasses;
- A requirement to meet specific time requirements for chilling and cooling of all finished carcasses and parts;
- A requirement that certain raw product be tested for *Salmonella*, a representative pathogen, and that establishments achieve targeted reductions in the incidence of *Salmonella*, in relation to the current national baseline incidence, in 2 years (discussed under II B, below);

 A requirement that all establishments adopt HACCP systems (discussed under II C, below).

FSIS intends to proceed to final rulemaking on the specific changes proposed in this document as soon as possible. After comments are reviewed and analyzed, if it is determined that some portions of this proposal can be made into final rules sooner than others after the close of the comment period, they will be separated from the other portions so as to not delay regulatory action on this important public health matter.

These proposals reflect ideas and suggestions generated from many people and organizations. Recent events have prompted a beneficial, ongoing dialogue between FSIS and consumer organizations, trade associations, and other Government agencies, among others, as well as among FSIS employees and their bargaining representatives, on what regulatory changes the Agency should undertake. FSIS values and relies greatly on the input from all these sources, and intends to continue this dialogue throughout this rulemaking and in its future regulatory activities.

1. Sanitation Standard Operating Procedures (SOP's)

Need for SOP's

Proper sanitation is an important and integral part of every food process and a fundamental requirement under the law. Insanitary facilities and equipment, and poor food handling and personal hygiene practices among employees create an environment in which pathogens can flourish. The law is quite clear: product produced or held under insanitary conditions is deemed adulterated, without any further showing required by the Government. FSIS inspectors are expressly charged with ensuring that product inspected and passed was in fact produced under sanitary conditions.

FSIS recognizes that current sanitation practices and performances vary widely among the diverse array of plants FSIS regulates. Well-run meat and poultry establishments have tight quality control and sanitation programs, including written sanitation SOP's, premised in large part on the direct and substantial link between the existence of insanitary conditions during production of meat and poultry products and the likelihood that bacteria—including pathogenic bacteria—will contaminate the finished product. Some establishments, however, do not have adequate programs and do not consistently maintain good sanitation. FSIS is nearing completion of its project to conduct unannounced reviews of 1,000 federally inspected meat and poultry establishments. The findings, based on 551 reviews so far, show that 60 percent (820) of 1,340 serious deficiencies were found in sanitation. Poor sanitation is the most frequently observed problem in meat and poultry establishments.

FSIS is proposing to require that all inspected establishments develop written sanitation SOP's to prevent direct contamination or adulteration of product before and during operations. Establishments would be required to maintain daily records to document adherence to the SOP's. The proposed sanitation SOP's would be compatible with the proposed HACCP requirement. Like HACCP, the sanitation SOP's reflect a commitment by establishment management to consistently control operations in the interests of public health. The SOP's demonstrate that establishment owners know their operations and how to keep the facilities and equipment clean. FSIS encourages both innovation and self-reliance in the achievement of good sanitation in all inspected establishments.

Self-reliance is important because identification of sanitation requirements has been viewed by some establishment owners and personnel as the inspector's responsibility. Such establishments often fail to take the initiative to find and remedy insanitary conditions, relying instead on the inspector to find deficiencies.

Mandatory sanitation SOP's are intended to clarify that sanitation is industry's responsibility, not the inspector's. The sanitation SOP's reflect the establishment's commitment to accomplish those activities consistently, independent of the inspector.

Written SOP's would make it easier for FSIS inspectors to perform their proper role of verifying that establishment management is conducting its operations in a sanitary