

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

FSIS NOTICE

10-04

1-29-04

QUESTIONS AND ANSWERS, REGARDING THE AGE DETERMINATION OF CATTLE AND SANITATION

I. PURPOSE

The Agency is issuing this notice to clarify:

1. that documentation, rather than dentition, can be the primary means of determining the age of animals and to describe the types of documentation that have proven to provide an accurate and reliable basis for making this determination.

2. how inspection program personnel should verify that sanitation of equipment has been properly conducted when there is a possibility of contamination by specified risk materials (SRMs)

PART I – Determination of the Age of Cattle

The age of cattle is determinative of which parts of cattle are SRMs as defined in 9 CFR 310.22. The guidance provided by the following questions and answers clarifies the types of records that an establishment may use to identify and to separate cattle that are younger than 30 months of age from cattle that are 30 months of age and older. VMOs are to conduct the procedures found in FSIS Notice 9-04 to verify that an establishment is following the procedures, as incorporated into its HACCP, Sanitation SOPs, or prerequisite program for determining the age of cattle.

Documentation, rather than dentition, provides the best means for determining the age of cattle. While dentition can be useful in the absence of documentation, it only provides a means of making general determinations about age. Documentation provides the means to specifically age the animals. Thus, establishments that separate cattle based on whether they are younger or older than 30 months of age may rely on documentation. This does not preclude the use of dentition if documentation is not available.

DISTRIBUTION: Inspection
Offices; T/A Inspectors; Plant Mgt;
T/A Plant Mgt; TRA; ABB; TSC,
Import Offices

NOTICE EXPIRES: 3/01/05

OPI: OPPD

As set out in FSIS Notice 9-04, inspection program personnel are to verify that if an establishment separates cattle that are younger than 30 months of age from cattle that are 30 months of age and older it follows its procedures for identifying and separating the cattle and is making appropriate determinations.

While performing verification activities related to the age of cattle, inspection program personnel are to verify, in establishments using documentation, that the records support the establishment's determinations. If the records do not support the determinations, inspection program personnel are to verify that the establishment takes the appropriate corrective action under 9 CFR 417.3(a) or (b).

NOTE: Hands-on dentition examinations are not to be used to determine the adequacy of the documentation. If a VMO is unsure as to whether the plant's procedures are adequate, he or she is to contact the Technical Service Center for technical assistance.

While performing verification activities related to the age of cattle, inspection program personnel are to verify, in establishments using dentition, that the establishment's determinations are consistent with the guidance provide in FSIS 5-04. If the determinations made by the establishment are not consistent with the guidelines, inspection program personnel are to verify that the establishment takes the appropriate corrective action under 9 CFR 417.3(a) or (b).

QUESTIONS AND ANSWERS

Question: What are the characteristics of documentation that have proven to be an accurate and reliable means for determining the age of cattle offered for slaughter?

Answer: The characteristics of documentation that is most useful in determining the age of cattle offered for slaughter are:

1. Documentation (e.g., records or certificates) that can be related to individual cattle and not just information about an entire lot, and
2. Documentation that provides evidence of age that goes back to the farm where the cattle were born, including the name and the address of the owner.

Question: What are examples of accurate and reliable documentation from the farm or ranch where the cattle were born?

Answer: The following are examples of farm or ranch documentation:

1. pregnancy check records (checks for individual cows and the results of the check for each one),
2. records of which cows were in a herd when a bull was put in with the herd, and when the bull was removed from the herd (to determine start of gestation),

3. records that document when individual cows were artificially inseminated,
4. calving records that document where (i.e., name and address of the producer) and when a calf was born, or
5. identification applied to calves (e.g., records from branding, electronic ear IDs, or ear tags).

Question: What are examples of accurate and reliable documentation from the feedlot where the cattle were held?

Answer: The following are examples of feedlot documentation:

1. Documentation that identifies the date that the cattle entered the feedlot and were given individual identification (e.g., eartags) and documentation that the producer provides with the cattle as they enter feedlot that includes on-farm records, and
 - i. the cattle have individual identification (e.g., eartags) that were placed on them on the farm, or
 - ii. the entire herd of cattle are certified as being born on the farm during a specific range (e.g., certification that a group of Angus cattle were born during the calving season of Spring 200X or Fall 200X) and based on the information the feedlot identifies each animal individually (e.g., eartags).

NOTE: When calving birthing ranges are provided, the oldest possible age based on the ranges should be assigned to the group of cattle.

2. Medication records or worming records at the feedlot that tie back to when the animal was received by the feedlot and identify the producer. The feedlot could use these records to identify the producer, who then could state when the cattle were born.

PART II - Sanitation

When an establishment is slaughtering or processing cattle 30 months and older and cattle younger than 30 months of age, what should inspection program personnel look for when verifying that the equipment (e.g., saws and knives) is properly cleaned and sanitized between carcasses or parts?

If **separate** equipment is used for cutting through SRMs **OR** if the establishment **segregates** the two age groups and slaughters or processes the younger group first, then routine operational sanitation procedures apply (in accordance with 9 CFR Part 416). For example:

- The establishment uses a dedicated saw to split the carcass from cattle 30 months and older.
- The establishment uses a knife to cut through the edible portions of the carcass and a separate saw to only cut through the vertebral column (e.g. when quartering a carcass).

Any equipment that is used to cut through SRMs (vertebral column, spinal cord, dorsal root ganglion, etc. of cattle 30 months and older) must be cleaned and sanitized before being used on carcasses or parts from cattle less than 30 months. For example:

- Splitting carcasses of mixed age groups in the slaughter department.
- Breaking quarters of mixed age groups into smaller portions in the fabrication department.
- A knife that is used to sever the head from the carcasses of mixed age groups.

NOTE: The equipment need not be cleaned to a pre-operational state before sanitizing. The organic materials must be removed to ensure adequate sanitization (this is similar to what is required when a saw cuts through an abscess).

For technical assistance contact the Technical Service Center.

/s/ Philip S. Derfler

Assistant Administrator
Office of Policy and Program Development