***Overall Sanitary Dressing Management: Verification, Documentation & Implementation:***

**Process Verification & Documentation:***Observations of sanitary dressing practices relative to the written program expectations should be completed and documented at a frequency that aligns best with the slaughter volume. Observations should be executed by a trained, independent designee when possible (i.e. no one who works on or oversees slaughter floor personnel). In general, observers and slaughter floor personnel should be comfortable and empowered knowing that failures and corrective actions are a sign of improving the process.*

**Personnel Training:***Personnel training is critical to the success of a sanitary dressing program. Observers and slaughter floor personnel should be trained to the expectations and held accountable for the process. Edits to the written program should be made when feedback from personnel aligns with the optimal hygiene expectations. All involved personnel should understand the critical nature of their roles in maintaining a clean carcass at every phase of dressing (i.e. don’t just wait for the trimmer to “clean up their mess”) as well as the consequences of haphazard sanitary dressing practices (e.g. cost of positives to the company downstream, risk of serious consumer health effects if not taken seriously).*

***Documentation Writing & Management:***

***The Sanitary Dressing SOP should be reviewed at least annually and updated as changes to the process occur.***

***The following are recommended sections and general guidance of what narrative should be covered when writing a sanitary dressing program in beef or other species that include a hide removal stage. Each section should address the critical process steps that contribute to hygienically preparing the carcass to comply with 9 CFR 310.18 (***[eCFR :: 9 CFR 310.18 -- Contamination of carcasses, organs, or other parts.](https://www.ecfr.gov/current/title-9/chapter-III/subchapter-A/part-310/section-310.18))***. Hygiene expectations can include but should not be limited to sanitizing/sterilizing order of knives, steels, and other equipment (e.g. sterilized knives should not be steeled on unsterilized steel), the direction of cut made, the orientation of knife to hide, specified risk material (SRM) removal precautions, etc.***

## DURING ALL STAGES OF SLAUGHTER SANITARY DRESSING, TRAINED SLAUGHTER EMPLOYEES ARE EXPECTED TO FOLLOW EACH OF THE LISTED ACTIONS WHERE APPLICABLE FOR THEIR POSITION:

* 1. The following shall be rinsed and sterilized (or sanitized) after each animal and as needed/soiled throughout the process: hands/gloves, aprons, knives, air knives, split saw, brisket saw, and hock cutters
  2. Knives, steels, and other basic dressing equipment shall be suspended in sterilizers (where readily available) when not in use. If the sterilizer is not readily available, equipment shall be sheathed within a scabbard or similar suitable storage to prevent contamination.
  3. To prevent cross-contamination, carcasses shall not be moved into the next workstation until the previous carcass has moved to the next workstation.
  4. Any incidental contamination shall be trimmed from carcasses throughout all stages of sanitary dressing.
  5. If an abscess is found, all equipment that was contaminated, or may have become contaminated, shall be rinsed and sterilized (or sanitized) immediately after an abscess is removed or contacted. Any parts of the carcass that were or may have been contaminated shall be trimmed with clean and sterile equipment.

## STICKING (BLEED OUT)/ HEAD SKINNING

*Knife usage protocol for the stick (sanitize between hide break and stick, “two knife system,” etc.) should be detailed as well as head skinning and other pre-hide removal carcass “prep” steps (shank removal, horn removal, etc.).*

### SKINNING

*Defining hide-cut lines and knife sanitation procedures/expectations (e.g. blade should cut from inside/out and away from the main carcass) is critical in this section since this is where much of the opportunity for carcass contamination of STEC (shigella-like toxin e. coli) occurs. Any additional facility-specific hide removal precautions to take such as around hocks, bung, udder, and other critical “cut lines” etc., should be acknowledged and understood. As hides are loosened, the “flapping” of the hide in various steps can also present a contamination risk and should be addressed.*

### BUNG REMOVAL

*The process of skinning around the bung is a step of heightened risk and therefore should be described in how contamination will be prevented. Specifically, the exposing/freeing of the rectum area and the measures taken to prevent additional fecal contamination (e.g. cautious and deliberate bagging and tying off the bung before completion of this step).*

### HEAD HANDLING

*The head handling process can vary greatly between facilities and species, primarily due to if and how the facility handles SRM at slaughter and throughout the process. Treating all carcasses at slaughter as if all beef are >30 months or saving > 30-month cattle for last can help drive consistency and efficiency of process, which helps set slaughter personnel up for success.*

*The location of head removal and knife separation/hygiene processes for removal of > 30-month heads, and methods to prevent ingesta and hide/fecal contamination on heads, should be detailed in this section (e.g. red handled knife only used for severing spinal cord and then back to using a black-handled knife for disjointing process, or sanitization step after knife contact with the spinal cord). Sanitization after severing the esophagus (ingesta contamination point) should also be mentioned. Layout any other head trimming or cleaning processing utilized to prepare carcasses for presentation for USDA inspection. This includes the tongue SRM removal process if saving tongues for variety meats.*

### CHEEK MEAT

### *Cheek meat preparation is basic; however, it is important to point out that cheek meat cannot be saved if a firearm (projectile) is used to render the animal unconscious (9 CFR 310.18(b)). Cheek meat is also susceptible to fecal and lymph node contamination, so care and consideration for these risks should be acknowledged at this step.*

### ESOPHAGUS

*This section can and should highlight steps used to avoid ingesta leakage from the esophagus (e.g. clipping, tying off), steps to break open the sternum, weasand rod usage and sanitation/sterilization steps, precautions to avoid “busting guts” during this phase should be covered within this section of the SOP*.

### EVISCERATION

*Important evisceration preparatory and process steps include trimming of midline (aka along hide break pattern line), knife orientation to avoid busting guts, and immediate measures to take in the event a busted gut results in carcass contamination. Acknowledging the risk and prevention of contamination from the bung and esophagus during removal should be described. The removal of other variety meats to prepare for USDA inspection should also be noted here.*

### VARIETY MEATS (if applicable)

### *Variety meats being collected for human consumption and/or inspection should be identified in this section. Trimming, sorting and any antimicrobial intervention steps that will be taken should be explained. In addition, how the variety meats will be presented to the next stage of processing can be defined here (in lugs, hung on organ trees, etc.).*

### SPLITTING

*The splitting section should address how to manage miss-split carcasses\*, proper spinal cord removal, disposal, and cross-contamination prevention procedures (frequency of saw sterilization).*

*\*miss-splits are often overlooked and not acknowledged as contributing to the heightened risk of incomplete spinal cord material removal due to creating “tunnels” from vertebral bone that easily conceal spinal cord material. 3rd party auditors vetting an SRM program will often target the miss-splits and scrutinize them much more closely, often finding spinal material that was left behind within these regions.*

### TRIMMING

*In preparation for the zero-tolerance inspection, visual scanning for fecal, ingesta, milk, and other foreign contaminants shall be addressed.  Bruising or blood build-up and high-risk areas of contamination such as hide break lines, hocks and necks. Flaps created in the fat during skinning should be called out as areas of particular scrutiny during the final trim stage as they often can hide contamination not only from the trimmers, but also from the interventions (hot water, acid spray, etc). This section should also acknowledge that all slaughter personnel are responsible for visual inspection and trimming of contaminants throughout each dressing stage.*

**FINAL INSPECTION & ANTIMICROBIAL INTERVENTION (HOT WATER WASH / ACID SPRAY)**

*This section should set expectations in preparation for final USDA inspection. Noting or referencing the facility’s zero-tolerance policy expectation (frequency, “who”, etc.) is also helpful to add. The proper antimicrobial intervention steps (for each intervention) should also be outlined in this section or if found throughout can be incorporated into those respective sections.*

### COOLER SPACING

*Although not typically thought of regarding sanitary dressing, hot carcass cooler spacing is critical for proper carcass cooling to aid in safer and higher quality products down the line. This section should lay out expectations that will aid in optimal carcass cooling, specifically within the first 24 hours of cooling.*