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# *REPORT TO THE CONGRESS*

## Consumer Protection Would Be Increased By Improving The Administration Of Intrastate Meat Plant Inspection Programs

B-163450

Animal and Plant Health Inspection Service  
Department of Agriculture

*BY THE COMPTROLLER GENERAL  
OF THE UNITED STATES*

~~713756~~ **093342**

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C o n t e n t s

		<u>Page</u>
DIGEST		1
CHAPTER		
1	INTRODUCTION	5
	Program requirements and funding	6
	Program administration	7
2	IMPROVEMENTS IN INSPECTION COVERAGE OF PLANTS SINCE 1967	8
3	IMPROVED PLANT-RATING CRITERIA NEEDED	12
	Basic requirements plants must meet	12
	Compliance level at plants visited	13
	Inconsistent plant ratings	18
	Conclusions	20
	Recommendation to the Secretary of Agriculture	20
	Department comments	20
	State comments	21
4	CRITERIA NEEDED FOR DETERMINING AND NOTIFY- ING STATES OF THE STATUS OF STATE PROGRAMS	22
	Conclusions	25
	Recommendation to the Secretary of Agriculture	26
	Department comments	26
	State comments	26
5	BENEFITS AVAILABLE THROUGH REVIEW OF PLANTS ON A STATISTICAL SAMPLING BASIS	28
	Conclusions	29
	Recommendation to the Secretary of Agriculture	29
	Department comments	29
	State comments	29
6	SCOPE OF REVIEW	30
APPENDIX		
I	States having "equal to" programs as of June 30, 1973	31

	<u>Page</u>	
APPENDIX		
II	Designated States as of June 30, 1973	32
III	Basic requirements for meat plants	33
IV	Random sample plants GAO visited that APHIS found unacceptable on one or more of the basic requirements	37
V	Random sample plants GAO visited that APHIS found acceptable on the basic requirements	41
VI	Letter dated August 9, 1973, from APHIS Administrator to GAO	45
VII	Principal officials of the Department of Agriculture responsible for administering activities in this report	48

#### ABBREVIATIONS

APHIS	Animal and Plant Health Inspection Service
GAO	General Accounting Office

D I G E S T

WHY THE REVIEW WAS MADE

The Wholesome Meat Act (1967) is designed to protect consumers from adulterated or misbranded meat and meat products regardless of where they are produced. It allowed States up to 3 years to develop and implement laws and programs that imposed inspection and sanitation requirements on *intrastate* meat plants equal to those imposed on federally inspected meat plants.

If a State developed and maintained an "equal to" program, the act authorized Federal assistance of up to 50 percent annually of the estimated cost of the State's program, otherwise, the Department was to designate the State for Federal inspection and assume inspection responsibility for its intrastate plants.

GAO reviewed the implementation of the 1967 law--which affected about 15,000 intrastate meat plants--to

- assess improvements in inspection coverage of such plants since 1967,
- determine the status of selected State programs, and
- evaluate the Department's administration of the program.

GAO visited meat plants under State inspection in California, Iowa, Maryland, and Missouri and plants formerly subject to State inspection in Kentucky, Minnesota, and Nebraska.

FINDINGS AND CONCLUSIONS

Inspection coverage of intrastate meat plants and administration of State and Federal meat inspection programs has improved since 1967. However, the Department's Animal and Plant Health Inspection Service, which administers Federal meat inspection laws, needs to improve its criteria for rating conditions at intrastate plants and for determining the status of State programs.

Improvements since 1967

About the time the law was passed, some 2,000 of the estimated 17,000 meat plants in the United States were under Federal inspection. The other 15,000 operated under State laws varying widely in coverage and effectiveness or, in 7 States, were under no meat inspection laws.

As of June 30, 1973, the Service recognized 40 States as having "equal to" programs covering about 8,700 intrastate plants and the Service covered about 6,200 plants, including

all plants in the 10 States, Puerto Rico, Guam, and the Virgin Islands designated for Federal inspection

The Department reported in March 1972 that about 3,000 plants had closed rather than meet the new standards.

The number of Federal and State inspection program personnel increased from 7,240 and 2,320, respectively, in 1967 to 10,200 and 4,870 in 1973 (See p 8 )

#### Plant-rating criteria

The Service needs to improve its criteria for rating whether conditions at State-inspected intrastate plants and Service-inspected plants formerly subject to State inspection comply with basic Federal requirements. For State-inspected plants, such ratings provide the primary basis for the Service's determining whether a State is maintaining an "equal to" program.

Service guidelines did not provide sufficient criteria for reviewers to determine the significance of variances from the basic requirements. Service reviewers were not consistent in rating conditions at the intrastate and former State-inspected plants GAO visited (See p 12 )

Service guidelines contain seven basic requirements that all federally inspected plants must meet. (See p 12 and app III.) Service reviewers are to judge conditions at State-inspected plants against these requirements and rate the conditions as acceptable or unacceptable. If one or more conditions are rated unacceptable, the plant is to be considered unacceptable.

To observe plant reviews and determine the levels of plant compliance in certain States, GAO representatives accompanied Service reviewers and, where appropriate, State supervisory inspectors on reviews of 269 plants selected at random from 2,143 plants in 7 States

California, Iowa, Maryland, and Missouri were operating "equal to" programs, Kentucky, Minnesota, and Nebraska were designated States where the Service inspected the plants.

The Service reviewers' ratings, which showed 202 acceptable and 67 unacceptable plants, showed that from 64 to 89 percent of the plants in the 4 "equal to" States and 76 percent (ranging from 72 to 88 percent) of the plants in the 3 designated States were complying with all basic Federal requirements (See p 13 )

The reviewers, however, were not consistent in their ratings. At 54 plants, conditions existed similar to those that had caused the 67 plants to be rated unacceptable but 45 plants received acceptable ratings. The other nine were rated unacceptable because they failed to meet one or more of the other basic requirements (See p 18 )

If the compliance levels at the 269 plants were adjusted to include the 45 plants rated acceptable but at which conditions not meeting Federal requirements existed, they would be decreased to a range from 50 to 77 percent in the "equal to" States and to 42 percent (ranging from 29 to 59 percent) in the designated States (See p 15 )

GAO asked the Service to explain why the 45 plants had been rated acceptable

The Service did not justify individual plant ratings but said that, in some instances, it appeared some reviewers improperly applied certain criteria and allowed consideration for product wholesomeness to be the overriding factor in rating the plants acceptable.

The Service said its reviewing and field supervisory officials had been cautioned to use common sense and good judgment in their final determinations of plant operations and inspection but that it was revising instructions that should help eliminate what appeared to be conflicting judgments on plant evaluations. In addition, the Service said that action was taken to correct the conditions in the plants in question (See p 19 )

Criteria for determining status of State programs

The Service needs to establish clear and objective criteria that can be applied uniformly in determining when a State is not maintaining an "equal to" program and when a State should be notified that the Department is considering designating its plants for Federal inspection. Such criteria should state the factors, including the percentage of a State's plants that must meet Federal requirements, and the weight to be given each factor in such determinations.

Because the Service does not have such criteria, its determinations of the status of State programs have lacked uniformity and its actions in dealing with the States have been inconsistent (See p. 22 )

Benefits available through review of plants on a sampling basis

The Federal meat inspection law requires the Secretary to determine at least annually whether State inspection programs continue to be "equal to" and to report the findings to the Congress. The Service strives to review all plants in each State having a program at least once a year.

In GAO's opinion, a quarterly random sample of plants within a State would provide the Service with adequate information to meet the law's requirements. The benefits of such sampling would include

- reducing the number of plant reviews,
- providing more time for correcting deficiencies,
- reducing administrative costs, and
- providing continued incentive for plants to maintain acceptable operations because they could be reviewed each quarter.

If the Service had used quarterly sampling at the time of GAO's review, it would have reviewed about 6,000 plants a year--an annual reduction of about 3,200 reviews (See p 28 )

RECOMMENDATIONS

The Secretary of Agriculture should have the Service's Administrator

- provide reviewers with improved plant-rating criteria that can be applied with a high degree of

uniformity and that specify review findings which require a plant to be rated unacceptable,

--establish and advise the States of the criteria, including the percentage of a State's plants that must meet Federal requirements, that will be used in determining when a State's program is "equal to" and when a State will be notified formally that the Department is considering designation for Federal inspection, and

--consider using quarterly random samples of plants as a basis for determining, and reporting to the Congress, the status of State meat inspection programs. (See pp. 20, 26, and 29 )

#### AGENCY ACTIONS AND UNRESOLVED ISSUES

Agriculture stated that GAO's recommendations were well received, that portions of them had already been implemented, and that others were in the final stages of preparation. It said that the Service was revising a directive which would

--provide for more uniformity and clarification of requirements for

acceptability of both State and Federal plants,

--establish and provide for adjusting from time to time (1) a deficiency level percentage requiring warning letters to State officials and (2) conditions requiring notification to the State of possible designation, and

--provide for a statistical quarterly random selection of plants to be reviewed. (See pp. 20, 26, and 29 )

The States generally agreed with GAO's conclusions and supported the recommendations (See pp 21, 26, and 29 )

#### MATTERS FOR CONSIDERATION BY THE CONGRESS

Bills now before the Congress would provide additional funding for State meat inspection programs (S 1021, H.R. 7156, and H.R. 8199) and would permit State-inspected meat products to move in interstate and foreign commerce (S 1919, H R 4141, and H.R. 4646) This report should assist the Congress in its deliberations on those bills and on consumer protection matters.

## CHAPTER 1

### INTRODUCTION

Testimony given before Senate and House Committees before passage of the Wholesome Meat Act, approved December 15, 1967 (Public Law 90-201, 81 Stat. 584), indicated that intrastate meat plants were operating well below Federal sanitation and facilities standards applicable to interstate plants and, in many instances, were under no inspection system. Allegations were made that some plants were placing in human food channels, animals which would be condemned under Federal standards

Allegations were made also that, because of plant conditions, nonexistent or weak State inspection systems, and the lack of product identity standards equal to Federal standards, adulterated and mislabeled products were marketed to consumers. Other testimony cited court cases involving the diversion of unwholesome meat into human food channels

To protect consumers from adulterated or misbranded meat and meat products regardless of where they are produced, the Congress passed the Wholesome Meat Act.<sup>1</sup> The act authorizes the Secretary of Agriculture to cooperate with States in developing and administering State meat inspection programs in States having laws imposing meat inspection and sanitation requirements at least equal to Federal laws governing meat and meat products moving in interstate and foreign commerce (21 U S C 661). For such purposes, the term "State" means any State, including the Commonwealth of Puerto Rico, or organized territory.

We made this review to (1) assess improvements in inspection coverage of intrastate meat plants since 1967, (2) determine the status of selected State programs, and (3) evaluate the Department of Agriculture's administration of the program. We visited State-inspected meat plants in California, Iowa, Maryland, and Missouri and plants formerly

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<sup>1</sup>The Wholesome Meat Act designated certain existing statutory provisions as the Federal Meat Inspection Act and amended the same. These provisions are codified in the United States Code (21 U S C 601 et seq )



subject to State inspection in Kentucky, Minnesota, and Nebraska

### PROGRAM REQUIREMENTS AND FUNDING

Federal law and implementing regulations provide for inspection of official meat plants--plants engaged in slaughtering or processing meat or meat products for sale--but exempt from normal inspection meat or meat products which are slaughtered or processed on a custom basis, that is, for the animal owner's personal, household, nonpaying guest, or nonpaying employee use

Custom operations, however, must comply with the law's sanitation, misbranding, and adulteration provisions and are subject to periodic surveillance. Custom plants can buy and sell already inspected meat and meat products to retail customers without losing their exempt status, but must mark custom products "Not for Sale" and separate them from sale products

The law gave the States 2 years, or at the discretion of the Secretary 3 years, to establish programs enforcing requirements equal to those imposed under Federal law and requires the Secretary to review the State programs at least annually. If a State did not develop or is unwilling to maintain an "equal to" program, the Department of Agriculture designates the State for Federal inspection and assumes inspection responsibility for its intrastate plants

Department guidelines provide that when a State is so designated, each intrastate plant in that State wishing to continue operation must either apply for Federal inspection or notify the Department of its intention to operate under a custom exemption. Individual plants in States with "equal to" programs may apply for Federal inspection if they intend to engage in interstate commerce or do business with a plant engaged in interstate commerce

As part of the Federal-State effort, the law authorizes the Secretary to provide technical assistance and training and to pay up to 50 percent annually of the estimated cost of a State's program. From the law's enactment in 1967 through fiscal year 1973, the Department provided about \$111 million in matching funds to assist States in carrying out meat inspection programs

The 92d Congress considered but did not enact bills<sup>1</sup> to increase up to 80 percent the Federal share of the cost of State meat inspection programs. Similar legislation-- Senate bill 1021 and House bills 7156 and 8199--is before the 93d Congress. Also bills to permit State-inspected meat products to move in interstate and foreign commerce (S. 1919, H.R. 4141, and H.R. 4646) have been introduced in the 93d Congress.

#### PROGRAM ADMINISTRATION

The Department's Animal and Plant Health Inspection Service (APHIS) administers Federal meat inspection laws. Its Deputy Administrator for Meat and Poultry Inspection Field Operations directs the field inspection staff and implements inspection regulations. APHIS' regional offices in Atlanta, Dallas, Des Moines, Philadelphia, and San Francisco are responsible for program administration in their regions.

Within the regions, circuit supervisors in 36 area offices (1) supervise inspectors in federally inspected interstate and intrastate plants and (2) review State-inspected plants. APHIS uses the results of its reviews of State-inspected plants as its basis for determining whether a State is maintaining an "equal to" program. Regional directors must report to headquarters at least quarterly on the status of State programs.

States with "equal to" programs are responsible for carrying out meat inspection laws at intrastate plants in their States, APHIS has this responsibility at plants in States without "equal to" programs. This responsibility includes granting, suspending, or withdrawing an official plant's inspection and terminating a custom plant's exemption.

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<sup>1</sup>H.R. 9432, H R 9845, H R 10754, and S 1316

## CHAPTER 2

### IMPROVEMENTS IN INSPECTION COVERAGE

#### OF PLANTS SINCE 1967

The States and APHIS have made progress since 1967 in implementing meat inspection programs covering intrastate plants. A 1971 Senate committee print<sup>1</sup> stated that, at or about the time the 1967 law was passed

- only about 2,000 of the estimated 17,000 meat plants in the United States were under Federal inspection and the other 15,000 operated under State laws varying widely in coverage and effectiveness or, in 7 States, were under no meat inspection laws,
- only 26 States provided for mandatory inspections of animals both before and after slaughter, key requirements of the law; and
- about 15 percent of commercially slaughtered animals and 25 percent of commercially processed meat products in the United States were not covered by adequate inspection laws.

In contrast, as of June 30, 1973, 5-1/2 years after the 1967 law was passed

- 40 States operated programs which APHIS had determined (1) were subject to adequate State laws and regulations and (2) had "equal to" programs. (See app. I.) These States' programs covered about 6,400 official intrastate meat plants and about 2,300 intrastate custom plants.
- APHIS' program covered about 5,100 official meat plants and about 1,100 custom plants. These included interstate plants throughout the United States and all plants in 10 States, Puerto Rico, Guam, and the Virgin Islands which APHIS had designated for Federal inspection. (See app. II.)

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<sup>1</sup>"The Effects of the Wholesome Meat Act of 1967 Upon Small Business," Select Committee on Small Business, U S Senate, Sept. 16, 1971.

Most intrastate meat plants have few employees. According to a 1970 Small Business Administration survey<sup>1</sup> of about 9,300 meat establishments affected by the law, about 51 percent had fewer than 6 employees and about 89 percent had fewer than 26 employees.

The managers of the plants affected by the law had to bring facilities and equipment into compliance with prescribed standards or discontinue operations. The Small Business Administration estimated that, on the basis of its 1970 survey of affected plants, about \$157.8 million had been spent to obtain new or to renovate plant facilities and equipment and estimated that an additional \$278.6 million was still required to bring plant facilities and equipment into compliance with Federal requirements. The Department reported in March 1972 that, after 1967, about 3,000 plants had closed rather than meet the new and tougher standards.

States that had achieved "equal to" status had entered into cooperative agreements with APHIS, enacted appropriate inspection laws, adopted budgets, hired veterinarians and other inspection personnel, and cooperated with APHIS in reviewing plants to be subject to inspection.

APHIS worked with the States on their laws and budgets, provided technical assistance and training, and designated Federal personnel to work with the States in developing and implementing their programs.

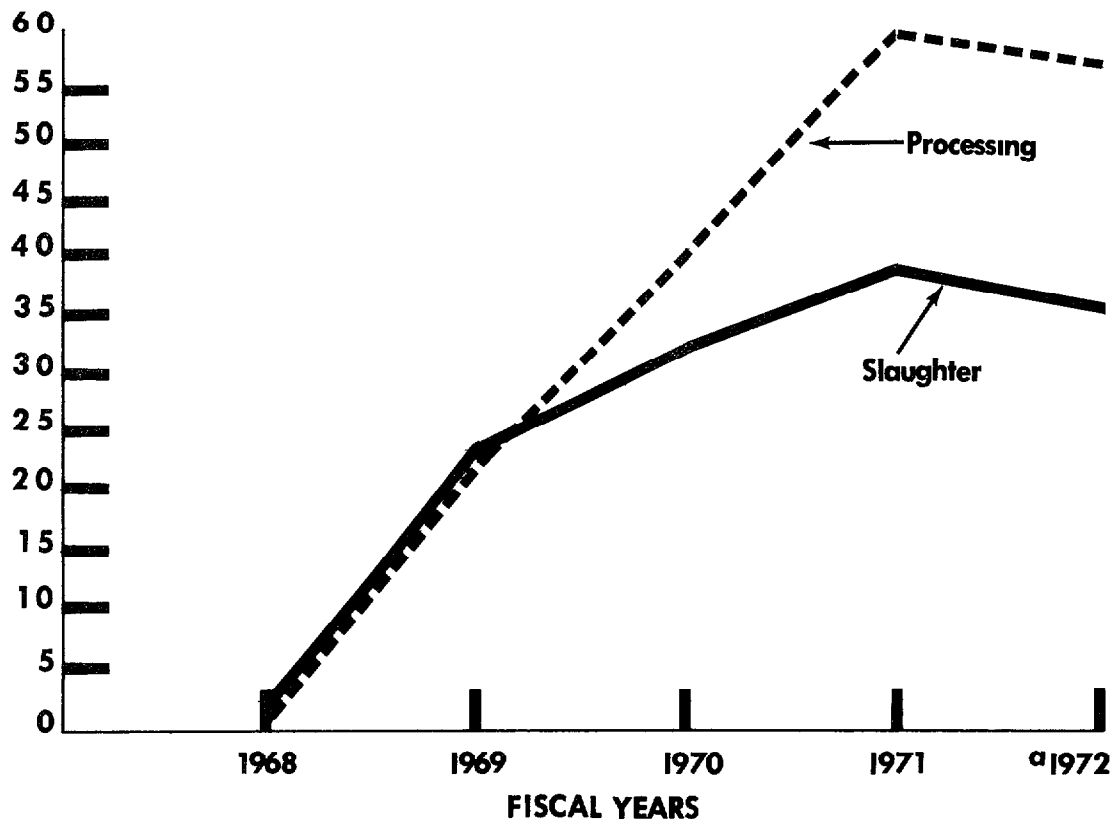
According to the Department, the overall number of Federal and State inspection program personnel had increased as follows from 1967 to 1973.

<u>Year</u>	<u>Federal</u>		<u>State</u>	
	<u>Full time</u>	<u>Part time</u>	<u>Full time</u>	<u>Part time</u>
1967	6,390	850	1,440	880
1973	<u>9,130</u>	<u>1,070</u>	<u>4,050</u>	<u>820</u>
Increase or decrease (-)	<u>2,740</u>	<u>220</u>	<u>2,610</u>	<u>-60</u>

<sup>1</sup> Survey results were included in "The Effects of the Wholesome Meat Act of 1967 Upon Small Business," Select Committee on Small Business, U S. Senate, Sept. 16, 1971.

As the States progressed in implementing their programs and as more inspection personnel were hired and trained, the volume of meat and meat products which State inspectors inspected and passed increased as follows

**Billions of pounds**



<sup>a</sup> Volume decreased from fiscal year 1971, in part, because APHIS designated seven States for Federal inspection during fiscal years 1971 and 1972

In addition to making progress since 1967 in developing and implementing meat inspection programs covering intra-state plants, APHIS has improved its administration of other aspects of the 1967 law.

In testifying before the Subcommittee on Livestock and Grains of the House Committee on Agriculture in March 1972, an Assistant Secretary said that the Department had been tolerant initially in determining the equality of State meat inspection programs. He said that the Department had tried in every possible way to give States that were trying to achieve "equal to" status during the initial implementation period as much opportunity as possible to do so.

APHIS officials told us that, after the initial certifications, they had strengthened their reviews for determining acceptability. APHIS records showed that it

- evaluates custom plants' compliance with certain basic requirements, although such plants were initially considered in compliance if they were not health hazards,

- has strengthened control over "Not for Sale" products, and

- is generally less lenient in rating plants.

The Department stated that it was proud of the achievements the States and the Department made in such a short time in this important consumer protection area. (See app. VI.)

The following chapters discuss further improvements that are needed.

## CHAPTER 3

### IMPROVED PLANT-RATING CRITERIA NEEDED

APHIS needs to improve its criteria for rating whether conditions at State-inspected intrastate plants and APHIS-inspected plants formerly subject to State inspection comply with basic Federal requirements. For State-inspected plants, such ratings provide the primary basis for APHIS' determining whether a State is maintaining an "equal to" program.

APHIS guidelines did not provide sufficient criteria for reviewers to determine the significance of their findings. APHIS reviewers were not consistent in rating conditions at the 269 intrastate meat plants we visited. The reviewers rated conditions at some plants as unacceptable, or not in compliance with basic Federal requirements, similar conditions at other plants were rated acceptable, or in compliance with basic Federal requirements.

More detailed plant-rating criteria would provide more equitable treatment of individual plants, help identify problems requiring correction, and provide a better basis for evaluating the "equal to" status of State programs.

### BASIC REQUIREMENTS PLANTS MUST MEET

APHIS guidelines contain seven basic requirements which Federal plants must meet. In reviewing State-inspected plants to help determine whether a State is maintaining an "equal to" program, APHIS reviewers judge conditions at the plants against these requirements and rate the conditions as acceptable or unacceptable. If one or more conditions are rated unacceptable, the plant is considered unacceptable.

At the start of our review, the seven basic requirements, which we used for our review and which appendix III explains in more detail, were

- A potable water supply
- Operational sanitation at a level to permit production of wholesome products
- At official plants, antemortem, postmortem, and processing inspection procedures sufficient to insure

product wholesomeness, at both official and custom plants, marking of custom products "Not for Sale," separation of custom and sale products, and adequate product handling and control procedures

- An effective sewage and waste disposal system.
- A pest control program capable of preventing or eliminating product contamination by rodents, insects, or animals.
- At official plants, control of (1) condemned products so they cannot be diverted to human food channels and (2) restricted products until rendered acceptable for human consumption and at both official and custom plants, control of inedible products.
- Adequate and sufficient welfare facilities to permit persons handling edible products to use good hygienic practices.

#### COMPLIANCE LEVEL AT PLANTS VISITED

To observe APHIS' evaluations of plants' compliance with the 7 basic requirements and to determine the compliance level in selected "equal to" States, we accompanied APHIS reviewers and State supervisory inspectors on visits to 185 intrastate plants we selected at random from 1,300 intrastate plants in California, Iowa, Maryland, and Missouri. At the time of our visits, these states had "equal to" programs.<sup>1</sup> We also accompanied APHIS reviewers on visits to 84 plants selected at random from the 843 plants formerly subject to

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<sup>1</sup>Following our plant visits in Missouri, the Department designated that State's program for Federal inspection at the Governor's request. The request stated that Missouri was discontinuing its program because of inadequate funding to operate the program for the entire fiscal year 1973



State inspection in three designated States--Kentucky, Minnesota, and Nebraska<sup>1</sup>--to determine a compliance level in those States for comparison purposes

Of the 269 plants, APHIS reviewers rated 202 as acceptable and 67, which failed to meet one or more of the basic requirements, as unacceptable. Appendixes IV and V show the names and locations of plants that APHIS reviewers rated unacceptable or acceptable, respectively. The 67 plants were rated unacceptable because of sanitation deficiencies, inspection requirements, particularly separation and marking of custom products, pest control, and control over inedible and condemned products.

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<sup>1</sup>APHIS records show that these States were designated for these reasons

#### Kentucky

After being informed by APHIS that certain provisions of the State law were not being enforced, the State requested APHIS to assume inspection responsibility.

#### Minnesota

The State failed to develop an "equal to" program within the 3 years prescribed by the 1967 law. The primary deficiencies were that inspection was not provided at all amenable establishments and the State's program did not provide for enforcement of all inspection requirements necessary to achieve "equal to" status.

#### Nebraska

After APHIS sent the State a notice in August 1971 that it would designate the State for Federal inspection if plant deficiencies found during an APHIS review were not satisfactorily corrected, the State requested APHIS to assume inspection responsibility. The State's letter cited funding problems as the primary reason for its request

As discussed on page 18, however, an additional 45 plants would have been rated unacceptable had APHIS reviewers consistently given unacceptable ratings to similar conditions at those plants.

The following table shows the compliance levels at the sampled plants (1) on the basis of the reviewers' plant ratings and (2) as adjusted to reflect the 45 plants rated acceptable but at which conditions not meeting Federal requirements existed. The adjusted figures are shown in parentheses.

	Number of plants						Percent rated acceptable	
	In State(s)	In sample	Rated unacceptable		Rated acceptable			
State-inspected plants								
California (note a)	353	35	4	( 8)	31	(27)	89	(77)
Iowa	432	64	16	(18)	48	(46)	75	(72)
Maryland	71	22	8	(11)	14	(11)	64	(50)
Missouri	444	64	19	(26)	45	(38)	70	(59)
APHIS-inspected plants (note b)	843	84	20	(49)	64	(35)	76	(42)

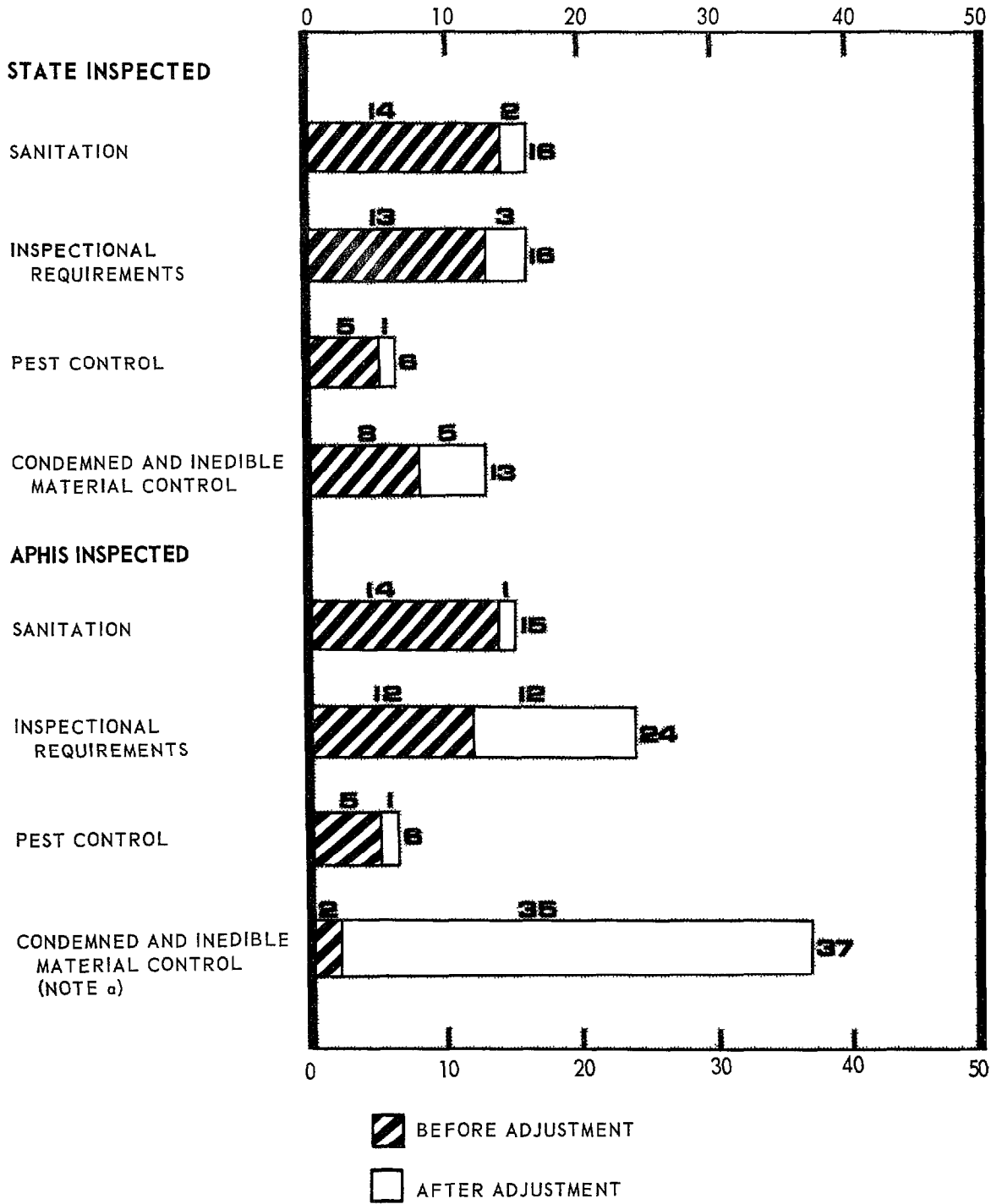
<sup>a</sup>An estimated 125 custom plants were not included under California's meat inspection program at the time of our visits. Following our visits and discussions with State and APHIS officials, California informed us that custom-exempt operators were being brought into compliance by the State's Department of Food and Agriculture with the cooperation of the State's Department of Public Health. The State further stated that this was an ongoing program which met APHIS criteria and that APHIS had identified and reviewed several custom-exempt operations.

<sup>b</sup>These statistics are presented on a composite basis because all plants in these States are included in APHIS' total inspection program and we drew a single sample from all former State-inspected plants in the three States. On an individual basis, the percentages of plants rated acceptable in Kentucky, Minnesota, and Nebraska were 88, 74, and 72 percent, respectively, by APHIS and 59, 29, and 52 percent, respectively, as adjusted.

Although APHIS has no criteria on the compliance level a State must have to maintain "equal to" status, the adjusted compliance levels shown in the table raise a question as to whether designation of a State for Federal inspection improves its intrastate meat plants' compliance with the basic Federal requirements. This question could not be answered, however, because APHIS did not have comparable data available on the compliance levels existing when it designated the States.

The following graph, prepared on a composite basis, shows that, except for the condemned and inedible material control category, the deficiencies noted during our visits existed at about the same percentages of State-inspected and APHIS-inspected plants both before and after adjustment for the inconsistent ratings.

**PERCENTAGE OF  
PLANTS WITH UNACCEPTABLE CONDITIONS**



<sup>a</sup> Increase in percentage due primarily to custom plants<sup>1</sup> not having an approved denaturing agent available

## INCONSISTENT PLANT RATINGS

APHIS reviewers were inconsistent in rating deficiencies at 54 plants we visited. These included 45 plants rated acceptable and 9 rated unacceptable because they failed to meet one or more of the other basic requirements.

Most of the inconsistencies related to plants where condemned and inedible material was not adequately controlled to prevent its sale as human food or where, contrary to Federal law, products were unmarked, unlabeled, or misbranded or custom products were not separated from sale products.

For example, APHIS instructions require that the inspector or plant management control condemned and inedible material until it is denatured. APHIS regulations require that denaturing agents, such as cresylic disinfectant, certain dyes, or charcoal, be intimately mixed throughout the material in sufficient quantity to give it a distinctive color, taste, or odor so that it cannot be confused with human food. These requirements seem clear, but the review guidelines do not spell out how the reviewers should evaluate compliance with these requirements.

As a result, APHIS reviewers, as the following table shows, rated the control of condemned and inedible material unacceptable at only 16 plants although 54 plants were not adequately controlling such material to prevent its sale as human food. As the graph on page 17 indicates, failure to meet this requirement at the plants in question was noted mostly at APHIS-inspected plants although it was also noted at State-inspected plants.

<u>Deficient condition</u>	Number of plants which APHIS reviewer rated condition as	
	<u>Unacceptable</u>	<u>Acceptable</u>
No approved denaturing agent available	7	26
Using unapproved denaturing agent	2	8
Product not under control of inspector or plant management	7	1
Denaturing agent not mixed with material (sprinkled on top layer)	—	<u>3</u>
Total	<u>16</u>	<u>38</u>

We asked APHIS headquarters officials to explain why acceptable ratings had been given to the 45 plants where some conditions did not meet the basic Federal requirements. APHIS did not justify the individual plant ratings but said that its reviewing and field supervisory officials had been cautioned to use common sense and good judgment in their final determinations of plant operations and inspection. APHIS said that in some instances, however, it appeared some reviewers improperly applied the criteria involving denaturing and marking of custom-exempt products and allowed consideration for product wholesomeness to be the overriding factor in rating the plants acceptable.

APHIS further said that, in providing the caution mentioned above, it failed to adequately delineate parameters within which judgments must be confined with respect to the category of plants in question. Also, APHIS said it was revising instructions that should help eliminate what appeared to be conflicting judgments on plant evaluations. In addition, APHIS officials informed us that action was taken to correct the conditions at the plants in question.

An industry association advised the Department in September 1972 that State officials and plant managers had criticized inconsistencies in plant ratings and had ascribed the cause to a lack of APHIS reviewer training and to unfair, unclear, impractical, inconsistent, or unreasonable aspects of APHIS review methods and criteria. In response, APHIS told the association it would continue to direct attention to proper training of reviewers.

APHIS officials told us they had

1. Published bulletins clarifying the seven basic requirements.
2. Met with the regional directors with emphasis on reevaluation of plant reviews with regard to uniformity.
3. Published clarification to regulations regarding facility and procedural requirements and emphasized using the publication, "Federal Facility Requirements for Small Existing Meat Plants."

- 4 Required correlation meetings between area supervisors, reviewers, and State supervisors.
- 5 Met with representatives of industry groups to arrive at a solution to problems as they relate to understanding plant reviews and regulation requirements

The officials also said that meetings had been held between regional directors and State program directors and area supervisors and State supervisors to discuss and reduce discrepancies in evaluating criteria and provide for better communication between them.

### CONCLUSIONS

Plant ratings need to be consistent and accurate to

--Treat all plants equitably.

--Identify all problems requiring correction. For example, APHIS reviewers' ratings did not show that inedible and condemned material was not being adequately controlled in 38 plants.

--Assist in determining whether State programs are "equal to," because APHIS uses plant ratings as the primary basis for such determinations

### RECOMMENDATION TO THE SECRETARY OF AGRICULTURE

We recommend that the Administrator of APHIS provide reviewers with improved plant-rating criteria that can be applied with a high degree of uniformity and that specify review findings which require a plant to be rated unacceptable

### DEPARTMENT COMMENTS

The Department stated that APHIS was in the final stages of revising a directive pertaining to reviewing and evaluating both State and Federal inspection systems. The directive is to provide more uniformity and clarification of requirements for acceptability of both State and Federal plants. The Department said that the directive

would clarify the criteria for the reviewer and should (1) result in more uniform ratings, (2) help identify problems requiring correction, and (3) provide a better basis for evaluating and determining the status of State programs. (See app. VI.)

#### STATE COMMENTS

We asked the four States whose inspection programs we reviewed to comment on this chapter. Maryland said it concurred in our conclusion, and Missouri said that inspection of all plants--whether large or small--should be uniform to insure equitable treatment. California and Iowa did not comment specifically on our conclusions and recommendations.



## CHAPTER 4

### CRITERIA NEEDED FOR DETERMINING AND NOTIFYING STATES OF THE STATUS OF STATE PROGRAMS

APHIS needs to establish clear and objective criteria that can be applied uniformly in determining when a State is not maintaining an "equal to" program and when a State should be notified that the Department is considering designating its plants for Federal inspection. Such criteria should state the factors that will be considered in making such determinations and the weight that will be given to them

Because APHIS does not have such criteria, its determinations of the status of State programs have lacked uniformity and its actions in dealing with the States have been inconsistent

The law requires the Secretary to review State programs at least annually to determine whether they should be continued in an "equal to" status. The Secretary is to notify the Governors of the deficiencies to be corrected if a State is not in an "equal to" status. If the State has not eliminated the deficiencies after 30 days, the Department is to publish a notice of designation in the Federal Register. If deficiencies remain after another 30 days, APHIS is to assume inspection responsibility.

APHIS officials told us that, in determining the status of State programs, they considered such factors as funding and staffing levels, the State's ability to correct known deficiencies, the effectiveness of action taken against plants endangering public health, and the attitude of State officials to cooperate in improving the State's program. They said that the foundation for APHIS's determinations was the plants' compliance with the basic requirements. Neither the law nor APHIS guidelines, however, have specified clearly the factors, such as the percentage of a State's plants that must meet the requirements, and the weight to be given them for determining whether a State is maintaining an "equal to" program

We analyzed Department and APHIS actions from August 1971 to November 1972 in advising States of the status of their programs. During that time, the Department had determined that five State programs were not "equal to" after APHIS

reviewers found that from 13 to 52 percent of the plants reviewed in these States did not meet the basic requirements. As the law provides, the Department sent notices of the deficiencies to be corrected to the Governors of the five States.

In six other States, however, APHIS reviewers found from 14 to 72 percent of the plants reviewed did not meet the basic requirements. APHIS officials wrote letters describing the deficiencies to State officials other than the Governor, usually the State Secretary or the Commissioner of Agriculture. Although APHIS asked the officials to respond within 30 days on how the deficiencies were being corrected, these letters did not constitute the notices provided by the law because they were not sent from the Department to the Governor and because they showed only that the program status was questionable.

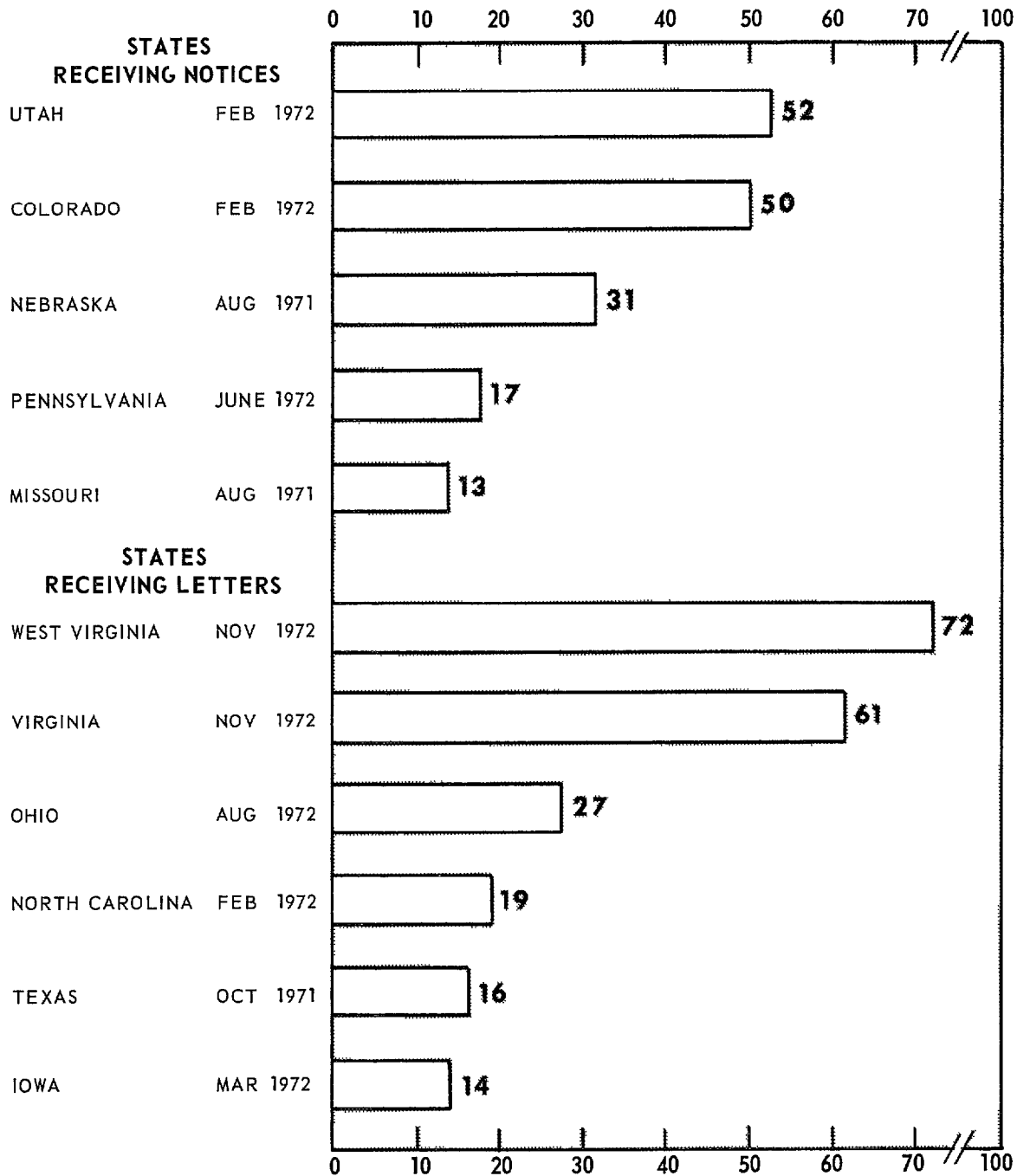
The following graph shows the incidence of noncompliance in the 11 States to which notices required by law or letters, respectively, had been sent, based on data in the notices, letters, or APHIS records.

The following table, which is based on information in the notices and letters, shows that the basic requirements not being met at the plants reviewed in the 11 States were similar whether the States were sent notices or letters.

<u>Requirement not met</u>	<u>Number of States receiving</u>	
	<u>Notices</u>	<u>Letters</u>
Water supply	2	3
Sanitation	5	6
Antemortem and postmortem inspection and processing inspection	5	5
Waste disposal system	1	1
Pest control	5	5
Control over condemned, inedible, and restricted material	5	4

In addition to citing the requirements that were not being met, the notices sent to the Governors of Utah and Missouri and the letter sent to North Carolina cited 4, 7, and 13 plants, respectively, that were endangering public health.

## PERCENTAGE OF UNACCEPTABLE PLANTS



**NOTE** We computed the percentages on the basis of the number of plant reviews APHIS reported. The data is representative of only a portion of the plants in the States. For example, the data for West Virginia was based on reviews of 29 of that State's approximately 125 plants and, for Colorado, 38 of its approximately 125 plants.

In the notices sent to the five Governors, the Department advised the States that, if they were to continue their programs, they would have to correct all the deficiencies within 30 days. None of the States accomplished this and APHIS subsequently

- assumed inspection responsibility in Nebraska after receiving a request from the Governor citing funding problems as the primary reason for his request,
- designated Pennsylvania for Federal inspection after its reviews of the States' 515 plants during the 30 days showed that 55 percent were unacceptable, and
- considered Colorado's, Missouri's,<sup>1</sup> and Utah's corrective actions sufficient, although APHIS reviews in these States during the 30 days showed that 28, 15, and 20 percent, respectively, of the plants reviewed were unacceptable.

#### CONCLUSIONS

APHIS needs to establish clear and objective criteria, stating the factors and the weight to be given to each for determining whether State programs should be continued in an "equal to" status or whether States should be sent formal notices as required by law or be advised by other means of needed improvements and possible designation for Federal inspection. Such criteria should include, as a minimum, the percentage of a State's plants that must meet Federal requirements, because this is the foundation for APHIS's determinations.

Such criteria would result in more equitable treatment of the States and provide a more reliable basis for determining whether State programs are "equal to."

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<sup>1</sup>APHIS assumed responsibility in August 1972 for the intra-state plants in Missouri, but this was done at the Governor's request and was not the result of the August 1971 notice.

RECOMMENDATION TO THE SECRETARY  
OF AGRICULTURE

We recommend that the Administrator of APHIS establish and advise the States of the criteria, including the percentage of a State's plants that must meet Federal requirements, that will be used in determining when a State's program is "equal to" and when a State will be notified formally that the Department is considering designation for Federal inspection.

DEPARTMENT COMMENTS

The Department stated that the directive APHIS was revising would establish (1) a deficiency level percentage requiring warning letters to State officials apprising them of unacceptable conditions affecting the certification status of their inspection programs and (2) the conditions requiring notification of the State of possible designation. The Department said that the deficiency level or conditions established must remain flexible so informed judgment can be exercised in correlating the other factors affecting the status of the inspection program in making a final assessment. It said that adjustments would be necessary from time to time to meet changing inspection procedures and technology and that notification to interested and affected parties would precede any such adjustments. (See app. VI.)

STATE COMMENTS

We asked the four States reviewed, which had inspection programs at the time of our review, and the States identified in this chapter as having received notices and letters from August 1971 to November 1972 to comment on this chapter. In general the States indicated no disagreement with the facts. Also some of the States that had received notices and letters emphasized that, after the reviews in question, they took corrective action and that they were continually endeavoring to improve their inspection programs. For example

--Ohio said that it was idealistic enough to desire a program with absolutely no deficiencies but realistic enough to know that it would probably always have some. Also, it said that it felt very strongly that

it had an excellent program and that it would continue its effort to eliminate its program's deficiencies.

--Utah said that, although it had an "equal to" program, no doubt from time to time unacceptable items and/or areas will be discovered and, when they were or are discovered, corrective action has been, and will continue to be, taken. Also, it said that, when the enormity of the overall meat inspection program was contemplated and one recognized the progress that had been made in this area since the Wholesome Meat Act was enacted, the Department must be given recognition. It said that establishing universally understood review criteria for use by all agencies is an exceedingly difficult task, human nature and variances considered.

## CHAPTER 5

### BENEFITS AVAILABLE THROUGH REVIEW

#### OF PLANTS ON A STATISTICAL SAMPLING BASIS

The 1967 law requires the Secretary to determine at least annually whether State inspection programs continue to be "equal to" and to report the findings to the Congress. To meet these requirements, APHIS' policy is to review all plants, in each State having a program, at least once a year in the company of State supervisory personnel and have its regional directors report to headquarters quarterly on the status of each State's program.

In our opinion, a quarterly random sample of all plants within a State would provide APHIS with adequate information to meet these requirements. The benefits of such sampling would include

- Reducing the number of annual plant reviews by Federal and State representatives
- Providing State supervisory personnel with more time to work with their inspectors and plant managers to correct deficiencies
- Reducing Federal and State administrative costs, such as travel costs and clerical costs of report preparation
- Providing continued incentive for plant managers to maintain acceptable operations because each plant could be reviewed each quarter

In initially determining the "equal to" status of State programs, APHIS officials generally based the determination on the results of a random sample of plants in each State. If, at the time of our review, APHIS had used a similar sampling plan each quarter, it would have reviewed about 6,000 plants a year, an annual reduction of about 3,200 plants.

## CONCLUSIONS

Significant benefits could be derived if, for each State having an inspection program, APHIS reviewed a quarterly random sample of State-inspected plants instead of reviewing each such plant annually. The use of random samples each quarter would provide APHIS with adequate information to meet the requirements that it determine and report to the Congress annually the status of the States' inspection programs.

## RECOMMENDATION TO THE SECRETARY OF AGRICULTURE

We recommend that the Administrator of APHIS consider using quarterly random samples of plants as a basis for determining, and reporting to the Congress, the status of State meat inspection programs.

## DEPARTMENT COMMENTS

The Department stated that the directive APHIS was revising would provide for use of such samples. (See app VI )

## STATE COMMENTS

We asked the four States reviewed, which had inspection programs at the time of our review, to comment on this chapter.

California agreed that quarterly random sampling reviews of State plants would result in considerable manpower and fiscal savings for both the States and APHIS and accomplish the purpose of the Wholesome Meat Act. Maryland said that a quarterly random sample of plants within a State should be selected for the reasons we cited. Missouri said that benefits gained through such sampling would better measure the status of a State's inspection program. Iowa did not comment specifically on this chapter.



## CHAPTER 6

### SCOPE OF REVIEW

We made our review at APHIS headquarters, Washington, D C., APHIS regional and area offices, and various locations in California, Iowa, Kentucky, Maryland, Minnesota, Missouri, and Nebraska. We reviewed pertinent laws, regulations, policies, procedures, and practices relating to meat inspection programs for intrastate plants.

From December 1971 through September 1972, we accompanied APHIS and, where appropriate, State supervisory inspectors on inspections of 269 intrastate plants we selected at random from 2,143 intrastate plants in the 7 States. We observed the inspections, examined correspondence files, plant inspection reports prepared by APHIS reviewers during these and earlier visits, and other pertinent data, and interviewed APHIS and State officials. At the State level, where applicable, we reviewed records, reports, and other data on the intrastate programs.

## STATES HAVING "EQUAL TO" PROGRAMS AS OF JUNE 30, 1973

<u>State</u>	<u>Date program was declared "equal to"</u>
Alabama	January 8, 1971
Alaska	December 11, 1970
Arizona	February 1, 1971
Arkansas	November 24, 1970
California	November 14, 1969
Colorado	April 13, 1971
Connecticut	January 25, 1971
Delaware	February 1, 1971
Florida	November 14, 1969
Georgia	December 30, 1970
Hawaii	April 12, 1971
Idaho	October 27, 1970
Illinois	December 30, 1970
Indiana	April 5, 1971
Iowa	January 7, 1971
Kansas	November 10, 1970
Louisiana	April 19, 1971
Maine	January 18, 1971
Maryland	November 14, 1969
Massachusetts	May 28, 1971
Michigan	January 25, 1971
Mississippi	January 12, 1971
New Hampshire	April 13, 1971
New Jersey	December 30, 1970
New Mexico	September 18, 1970
New York	December 17, 1970
North Carolina	April 8, 1971
Ohio	April 7, 1971
Oklahoma	December 4, 1970
Rhode Island	January 18, 1971
South Carolina	November 13, 1970
South Dakota	January 29, 1971
Tennessee	October 28, 1970
Texas	April 22, 1971
Utah	January 25, 1971
Vermont	December 30, 1970
Virginia	February 1, 1971
West Virginia	April 22, 1971
Wisconsin	January 5, 1971
Wyoming	December 9, 1970

## APPENDIX II

## DESIGNATED STATES AS OF JUNE 30, 1973

<u>State</u>	<u>Date of assumption of jurisdiction by the Department of Agriculture</u>
Kentucky	January 14, 1972
Minnesota	May 16, 1971
Missouri	August 18, 1972
Montana	April 27, 1971
Nebraska	October 1, 1971
Nevada	May 31, 1973
North Dakota	June 22, 1970
Oregon	July 1, 1972
Pennsylvania	July 17, 1972
Washington	June 1, 1973
Puerto Rico	June 18, 1971
Guam	January 21, 1972
Virgin Islands	November 27, 1971

## BASIC REQUIREMENTS FOR MEAT PLANTS

APHIS guidelines in effect at the start of our review established seven basic requirements which Federal and State plants had to meet to be judged acceptable. These requirements, which differed in certain respects for custom plants, were:

1. Potable water supply

Water used in areas in which edible products are slaughtered, dressed, eviscerated, processed, handled, or stored must be potable. The plant must have on file a certification from the local authority having jurisdiction that, on the basis of analyses of samples taken from within the facility, the water is potable.

If the water is from a municipal source, such certification must be annual. If the water is from a private source, such as a well, spring, or cistern, certification must be semiannual. Additional testing and certification by the local authority may be required if there is reason to believe that the water supply is being contaminated by such means as backsiphonage, surface drainage, ineffective protection of wells, or floods.

Lack of certification is not sufficient evidence to judge a water supply as nonpotable, however, in such cases, plant management must present a certificate of potability before final judgment is made on this item. Until the determination is made, no decision can be made regarding plant status.

This requirement applies to both official and custom plants.

2. Operational sanitation

Operational sanitation must be at a level that permits the production of wholesome products. Facilities and equipment are to be properly cleaned at regular intervals. The operating practices and procedures are to provide for handling products without undue or continued exposure to contaminants and contaminating surfaces. Production personnel are to practice, and management is to provide necessary equipment and materials to encourage, good personal hygiene.

## APPENDIX III

This requirement applies to both official and custom plants

### 3 Antemortem and postmortem inspection

Antemortem and postmortem inspection procedures and the inspection of processed products must be sufficient to insure product wholesomeness. Antemortem and/or postmortem inspection must be accomplished in a manner that will detect and remove from human food channels any carcass, part, or organ that evidences unwholesomeness. The inspector is to use good judgment in evaluating the effect of any deficiency on the total antemortem or postmortem inspection procedure.

The inspection and control of processed products must provide assurance that only sound, wholesome products are distributed to human food channels. This includes acceptable procedures for destroying trichinae in products containing pork muscle, use of only wholesome ingredients, use of only acceptable chemicals in acceptable quantities, and adequate protection of products during processing and storage.

Also

- custom-prepared products are to be plainly marked "Not for Sale" immediately after being prepared and are to be kept so identified until delivered to the owner and
- if a custom operator prepares or handles any products for sale, they are to be kept separate from the custom-prepared products at all times while the latter are in his custody

This requirement applies to both official and custom plants, except that antemortem, postmortem, and processing inspection procedures apply only to official plants.

### 4 Sewage and waste disposal system

The sewage and waste disposal system must provide for disposal of waste and/or sewage, including manure, paunch contents, trash, and paper, in a manner that does not permit undue accumulation, the development of odors, or the materials' serving as a harbor for insects, vermin, or rodents.

This requirement applies to both official and custom plants

5 Vermin and insect control

The plant's program must be able to prevent or eliminate product contamination by rodents, insects, or animals. Plant management must make all reasonable efforts to prevent the entry of rodents, insects, or animals into areas where products are handled, stored, or processed. Such efforts would include effective closure of outside openings (doors, screens, and windows), use of such exterminating procedures as sprays and baits, and absence of rodent or insect harborage and breeding places on the premises.

The presence or evidence of the presence of a rodent or an insect in a plant does not alone warrant the conclusion that the plant's program is unacceptable. All factors, including number, frequency, location, and management efforts to eliminate or correct faulty facilities, must be considered.

This requirement applies to both official and custom plants

6 Control of inedible, condemned, and restricted products

Condemned and inedible materials or restricted products must be controlled so they cannot be diverted to human food channels. Condemned materials must be under direct positive controls of the inspector until they are acceptably denatured or rendered incapable for use as human food.

The plant and inspector must control inedible materials until they are effectively denatured or decharacterized and not capable for use as human food or until they are packaged and identified as food other than for humans.

Restricted products, those which require further treatment before being used as human food, must be controlled until they are rendered acceptable for human consumption

Control of condemned materials and restricted products applies only to official plants. Control of inedible materials applies to both official and custom plants.

7 Welfare facilities

The plant must have sufficient toilets and lavatories to permit personnel handling edible products to use good hygienic practices. The facilities must provide space for the personnel to maintain acceptable clean clothing and to keep their hands and equipment clean. The facilities must be so located as not to discourage their use by plant personnel

This requirement applies to both official and custom plants.

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During the review, APHIS revised the basic requirements. The principal changes were (1) incorporating the welfare facilities requirement into the operational sanitation requirement, (2) establishing processing inspection as a requirement separate from antemortem and postmortem inspection, and (3) incorporating the requirements relating to control of restricted products into the antemortem and postmortem inspection requirement

RANDOM SAMPLE PLANTS GAO VISITED THAT APHIS FOUND  
UNACCEPTABLE ON ONE OR MORE OF THE BASIC REQUIREMENTS

<u>Name and location</u>	<u>Date of visit</u>	<u>Basic requirement(s) not met</u>	<u>Corrective actions</u>
<b>California</b>			
Official plants			
AnSCO Quality Meats, Bellflower	June 23, 1972	Sanitation Pest control	Operations stopped by State inspector on date of visit Plant found acceptable by APHIS on July 18, 1972
Odono's Meat Company, Los Angeles	June 23 1972	Sanitation Control over inedible and/or condemned materials	Operations stopped by State inspector for 7 hours Plant found acceptable by APHIS on June 23, 1972
LeDel Meat Company, Los Angeles	June 22 1972	Sanitation	Operations stopped by State inspector on date of visit Plant found acceptable by APHIS on July 19, 1972
Camp's Steak Co , Inc , Cuiver City	June 22 1972	Sanitation	Operations in affected area stopped by inspector on date of visit Plant found acceptable by APHIS on July 19, 1972
<b>Iowa</b>			
Official plants			
M&M Meat Market, Hull	Jan 13, 1972	Sanitation Separation of custom product from sale product	State closed plant for 3 days Plant found acceptable by APHIS on Mar 16, 1972
Midwestern Packing Co , Nevada	Jan 25, 1972	Marking of custom products Pest control Control over inedible and/or condemned materials	Some corrections made on date of visit Corrective action report submitted by State supervisor on Feb 9, 1972 Plant found acceptable by APHIS on May 23, 1972
Brewer Wholesale Meats, Des Moines	Jan 6, 1972	Sanitation Pest control	Operations stopped by State inspector on date of visit Plant found acceptable by APHIS on Mar 14, 1972
Sawyers' Tendermost, Fort Dodge	Dec 13, 1971	Sanitation	Operations stopped by State inspector on date of visit Plant found acceptable by APHIS on May 23, 1972
Protivin Locker, Protivin	Jan 6, 1972	Separation of custom product from sale product	Corrected by plant on date of visit
American Provision Company, Davenport	Jan 11, 1972	Sanitation Control over restricted material	Plant cleaned before operations permitted to start next day Plant found acceptable by APHIS on Mar 22, 1972
Ray's Pizza Kitchen, Charles City	Jan 7, 1972	Control over inedible and/or condemned materials	Approved agent to accomplish control subsequently obtained by plant
Whitaker's Frozen Food Co Evansdale	Jan 5, 1972	Processing inspection trichinae control Control over inedible and/or condemned materials	State inspector submitted corrective action reports on Feb 11 and 25, 1972 Plant found acceptable by APHIS on Mar 20, 1972
Stanhope Locker, Stanhope	Jan 19, 1972	Marking of custom products Sewage and waste disposal system	Plant closed by State inspector on date of visit Plant found acceptable by APHIS on Jan 20, 1972
Custom plants			
Miller Lockers, Merrill	Jan 11, 1972	Sanitation Marking of custom products	State closed plant for 3 days Plant corrections verified by State
Norman J Schroeder Malcom	Jan 17, 1972	Control over inedible materials	Plant correction verified by State on Feb 12, 1972 Plant correction verified by APHIS on Mar 21, 1972 but plant rated un- acceptable for other conditions Plant closed by State Plant remodeled and found acceptable by APHIS on May 31, 1972
Sellen's Market and Locker, Hubbard	Dec 14, 1971	Sanitation	State closed plant for 7 days Plant found acceptable by APHIS on Dec 22, 1971
Titonka Locker, Titonka	Dec 15, 1971	Marking of custom products	Plant correction verified by State on Feb 7, 1972 Plant found acceptable by APHIS on June 14, 1972
Knight's Locker Service, Iowa Falls	Dec 14, 1971	Water supply	State closed plant on Dec 27, 1971 Plant reopened on Jan 4, 1972, after correction
Koranda Locker Service, Superior	Jan 12, 1972	Sanitation Marking of custom products	State closed plant for cleaning on date of visit Plant found acceptable by APHIS on Mar 15, 1972



APPENDIX IV

<u>Name and location</u>	<u>Date of visit</u>	<u>Basic requirement(s) not met</u>	<u>Corrective actions</u>
Iowa (continued) Custom plants (continued) Jewell Locker Jewell	Jan 7 1972	Sanitation Marking of custom products Pest control	State closed plant for cleaning and correction of other deficiencies Plant found acceptable by APHIS on Jan 20, 1972
Maryland Official plants Maurer and Miller, Manchester	June 2, 1972	Sanitation Antemortem inspection - procedures and facilities	State suspended slaughter operations on June 13, 1972 Slaughter operations resumed on June 19, 1972 Sanitation found acceptable by State on June 30, 1972 Plant found acceptable by APHIS on Sept 6, 1972
Mt Airy Locker Plant, Mt Airy	May 15 1972	Postmortem inspection	State inspector transferred from plant July 1 1972, and subsequently inspector's employment was terminated by State Plant found acceptable by APHIS on Sept 11 1972
Manger Packing Co , Baltimore	May 15 1972	Sanitation	APHIS revisited plant on Sept 6, 1972, and sanitation was rated unacceptable Plant withdrew from State inspection service on Sept 8 1972
Fralely Packing Company Thurmont	May 18, 1972	Control over inedible and/or condemned materials	Plant corrected some deficiencies on date of review Plant found acceptable by APHIS on June 14, 1972
Germantown Meats, Germantown	May 15 1972	Control over inedible and/or condemned materials	State report dated June 9 1972, showed corrective action underway Plant found acceptable by APHIS on Sept 11, 1972
Custom plants Oakwood Farms, Conowingo	May 16 1972	Control over inedible materials	Plant found acceptable by APHIS on June 8, 1972
Sudlersville Locker Plant, Sudlersville	June 1 1972	Marking of custom products Pest control	Plant found acceptable by APHIS on June 26, 1972
Welton Shockley Salisbury	June 12, 1972	Marking of custom products	APHIS visited plant on July 20 1972 -plant not operating
Missouri Official plants Scholten Meat Company Marceline	May 9 1972	Sanitation Pest control Control over inedible and/or condemned materials	Plant closed by State State advised that plant did not reopen
Herrod Packing Co , Inc Joplin	May 22, 1972	Sanitation Processing inspection-- procedures and labeling	State advised that corrections were made Plant found acceptable by APHIS on June 20, 1972
Moberly Packing Co Inc Moberly	May 10, 1972	Sanitation Processing inspection labeling	Plant reviewed by APHIS on June 13, 1972 Some corrections made but sanitation still unacceptable State furnished corrective action report on July 24, 1972
Hester Packing Bernie	May 11, 1972	Sanitation	Slaughter operations not permitted to start by State Cleaning and correction of other deficiencies began during plant visit Status of corrections furnished by State on July 1, 1972 APHIS did not revisit plant because State program was designated for Federal inspection
Holden Packing Co , Holden	May 25, 1972	Control over inedible and/or condemned materials	Plant corrected deficiency during review
Rosser Meat Co , Hannibal	May 24, 1972	Sanitation Marking of custom products and processing inspection--labeling and branding Control over inedible and/or condemned materials	State verified plant corrections APHIS did not revisit plant because State program was designated for Federal inspection
Austin Chili Co St Louis	May 23, 1972	Pest control Control over inedible and/or condemned materials	Plant found acceptable by APHIS on June 1, 1972
Mazur Meat Co , Ferguson	May 16, 1972	Sanitation Processing inspection-- inspector responsibilities	Plant operations stopped by State Plant found acceptable by APHIS on June 1, 1972
John Graves Food Service, Chillicothe	May 11, 1972	Sanitation	State verified plant corrections Plant found acceptable by APHIS on June 13, 1972

APPENDIX IV

<u>Name and location</u>	<u>Date of visit</u>	<u>Basic requirement(s) not met</u>	<u>Corrective actions</u>
Missouri (continued)			
Official plants			
(continued)			
Lent Meat Market Salisbury	May 10, 1972	Sanitation Processing inspection Labeling	Plant changed from inspected plant to retail exempt Plant found acceptable by APHIS on June 13 1972
Custom plants			
Seymour Locker, Seymour	May 12 1972	Sanitation Marking of custom products	Sanitation deficiencies being corrected on date of visit Plant found acceptable by APHIS on June 20 1972
Howard and JoAnn Utech Joplin	May 22 1972	Pest control	No operations on date of visit Plant found acceptable by APHIS on June 20 1972
Mt Vernon Elec Refrigeration Mt Vernon	May 24 1972	Sanitation	Plant revisited on June 20, 1972, by APHIS and sanitation was unacceptable State advised that no slaughtering would be permitted until corrections were made
Windsor Locker Slaughterhouse Windsor	May 25 1972	Marking of custom products	Plant management advised State that corrective action was taken and promised future compliance
Alton Locker Plant Alton	May 9 1972	Sanitation	State verified plant correction
Adams Meat Processing Houston	May 12 1972	Marking of custom products Control over inedible materials	Plant corrected deficiencies during review
Jeter Grocery and Locker, Raymore	June 6, 1972	Separation of custom product from sale product	Corrective action promised by owner on date of review
Clough's Processing Carl Junction	May 22 1972	Pest control Control over inedible materials Employee welfare facilities	No meat products being processed on date of visit Plant found acceptable by APHIS on June 20 1972
Sherrell's Service Meta	May 23 1972	Marking of custom products	Plant owner in letter dated June 19 1972 advised that all meat and carcasses were being properly stamped
Kentucky			
Official plants			
Bruder's Meat Shoppe, Louisville	Sept 11 1972	Sanitation	APHIS supervisor reported on Oct 10 1972 that sanitation was acceptable
Custom plants			
Meyer and Hardy Locker Alexandria	Sept 7, 1972	Sanitation	No operations being conducted at time of visit APHIS supervisor verified on Sept 8, 1972 that corrections were made
Minnesota			
Official plants			
Froze n Food Co Sauk Centre	Aug 11 1972	Sanitation Pest control Control over inedible and/or condemned materials	APHIS supervisor stopped operations for cleaning and elimination of flies on date of visit Plant voluntarily stopped operations on Aug 14 1972, for additional cleaning APHIS supervisor stopped operations on Aug 15 1972 because of insanitary conditions
Henning Locker Plant Henning	Aug 10 1972	Marking of custom products	APHIS supervisor found plant acceptable on Sept 28 1972
Custom plants			
Battle Lake Co op Creamery Battle Lake	Aug 9 1972	Marking of custom products	APHIS reviewed plant on Sept 5 1972 and found it unacceptable because custom carcasses not marked 'Not for Sale, sanitation deficient, and pest control inadequate
Jordahl's Store Lake Park	Aug 9 1972	Marking of custom products	APHIS found plant acceptable on Sept 13 1972
Cooper's IGA Isle	Aug 7 1972	Sanitation Control over inedible materials	APHIS found plant acceptable on Oct 12 1972
Speltz Meat Market Rollingstone	Aug 18 1972	Sanitation Pest control	Custom exemption terminated by APHIS on date of review Exemption restored by APHIS on Aug 28 1972 after plant was found acceptable
Horejsi Sausage Kitchen Webster	Aug 17 1972	Sanitation	APHIS found plant acceptable on Sept 18 1972
Louis Irdich Butchering Little Hill	Aug 10 1972	Marking of custom products	APHIS found plant acceptable on Sept 14 1972

APPENDIX IV

<u>Name and location</u>	<u>Date of visit</u>	<u>Basic requirement(s) not met</u>	<u>Corrective actions</u>
Minnesota (continued)			
Custom plants (continued)			
Lakefield Lockers Lakefield	Aug 22, 1972	Sanitation Marking of custom products Pest control	Exemption terminated by APHIS on date of review Plant management was changed effective Sept 1 1972 Revisited by APHIS on Sept 13, 1972 and plant rated acceptable
Elm Dale Creamery Association Bowlus	Aug 10 1972	Marking of custom products	APHIS found plant acceptable on Sept 14, 1972
Violette's Locker Oklee	Aug 8 1972	Marking of custom products	APHIS found plant acceptable on Sept 6, 1972
Nebraska			
Official plants			
Carlson's Meat and Locker, Blair	Aug 10, 1972	Sanitation	Plant not permitted to operate next day until made acceptable
Kimball Locker Plant, Kimball	Aug 16, 1972	Postmortem inspection	Corrective action reports submitted by APHIS supervisor and plant inspector on Sept 6 and 10, 1972, respectively
Cetak's Inc Ord	Aug 14, 1972	Processing inspection-- procedures and labeling	Corrective action report furnished by APHIS supervisor on Aug 24, 1972
Custom plants			
Elmwood Locker, Elmwood	Aug 11, 1972	Sanitation Separation and marking of custom products	APHIS supervisor found plant acceptable on Aug 25, 1972
Hansen's Locker, Table Rock	Aug 7, 1972	Sanitation	APHIS supervisor found plant acceptable on Aug 15, 1972
Horn's Produce and Transfer, Syracuse	Aug 8, 1972	Sanitation Pest control	APHIS supervisor found plant acceptable on Aug 23 and 30, 1972
Thurston Locker Thurston	Aug 18 1972	Sanitation	Revisited by APHIS on Aug 21, 1972 Operations not permitted to start until equipment was cleaned Corrective action status report furnished by APHIS supervisor after another review on Sept 5, 1972

RANDOM SAMPLE PLANTS GAO VISITED THAT  
APHIS FOUND ACCEPTABLE ON THE BASIC REQUIREMENTS

<u>Name and location</u>	<u>Date of visit</u>
CALIFORNIA	
Official plants	
Upland Packing Company, Upland	June 28, 1972
C V Panizzera, Occidental	June 20, 1972
Culver City Meat Company, Los Angeles	June 22, 1972
Hooker Kolb Meat Company, San Bruno	June 15, 1972
Reedley Meat Company, Reedley	June 28, 1972
Frank's Quality Meats, Sacramento	June 8, 1972
Jordano's, Inc , Santa Barbara	June 20, 1972
L&M Meat & Frozen Foods, Sacramento	June 8, 1972
Mouet Provision Company, San Diego	July 6, 1972
Chung Fat Company, San Francisco	June 13, 1972
Consumer Beef and Supply, Riverside	June 27, 1972
Eddie's Meat Market, Modesto	June 27, 1972
Crown Meat Company, Bakersfield	June 29, 1972
Stater Brothers Markets, Colton	June 27, 1972
Souza's Quality Meats, Tracy	June 9, 1972
Rudolph's Meats, South El Monte	June 21, 1972
Ray Terrell's Wholesale Meat Supply, Pomona	June 27, 1972
Allied Meat Service of California, San Leandro	June 19, 1972
Okeh Caterers, Bell	June 23, 1972
Eschbach Meat Products, Gardena	June 29, 1972
Siegel Meat Company, Hayward	June 19, 1972
Antelope Locker, Red Bluff	June 22, 1972
Sung Sung Market, Inc , Stockton	June 9, 1972
Richwood Meat Company, Merced	June 27, 1972
Hagemann Meat Company, Santa Rosa	June 20, 1972
Rex Meat Market, Fresno	June 28, 1972
O'l' Smokey Meat Co , Atascadero	June 30, 1972
Moran Meat Co , San Gabriel	June 21, 1972
Escondido Foods, Escondido	July 6, 1972
Elena's Food Specialties, Inc , San Francisco	June 13, 1972
Rickert Meat Co , Cottonwood	June 22, 1972
IOWA	
Official plants	
Kunz Cold Storage, Emmetsburg	Dec 16, 1971
Preston Locker, Preston	Jan 11, 1972
Rock Rapids Locker and Freezer Provisioning, Rock Rapids	Jan 14, 1972
Adel Locker Service, Adel	Jan 21, 1972
State Center Locker, State Center	Jan 18, 1972
Gene's Locker, Holland	Dec 14, 1971
Sigourney Locker, Sigourney	Jan 4, 1972
Kupka's Market and Locker, Tama	Jan 17, 1972
Boone Locker, Boone	Jan 18, 1972
Little Rock Locker, Little Rock	Jan 11, 1972
Keswick Locker, Keswick	Jan 5, 1972
Stockport Locker, Stockport	Jan 10, 1972
Baumert's Meat Processing, Kalona	Jan 13, 1972
Iowa State University Meat Laboratory, Ames	Jan 17, 1972
Kalona Locker Plant, Kalona	Jan 14, 1972
Woudstra Packing Company, Hospers	Jan 11, 1972
Hickory Hut, Des Moines	Jan 6, 1972
Randy's Frozen Meats, Boone	Dec 13, 1971
Des Moines Skill Center, Des Moines	Jan 6, 1972

APPENDIX V

<u>Name and location</u>	<u>Date of visit</u>
IOWA (continued)	
Official plants (continued)	
Britt Sausage Company, Britt	Dec 15, 1971
Elsheimer Processing, West Union	Jan 6, 1972
Lynch Sausage Company, Waterloo	Jan 5, 1972
Nelson Locker, Hartley	Jan 20, 1972
Forbes Meat Processing, Harris	Jan 13, 1972
W A Gay and Company, Inc , Iowa City	Jan 25, 1972
Custom plants	
Morse Locker Service, Melcher	Jan 5, 1972
Sedlmayr's Self Service & Locker, Farmersburg	Jan 5, 1972
Barden's Locker, Clarion	Jan 7, 1972
W W Locker System, Alburnett	Jan 12, 1972
Herwig's Locker & Grocery, Wadena	Jan 5, 1972
Lengeling's Frozen Food Center, Denison	Jan 7, 1972
J&H Locker, Cherokee	Jan 12, 1972
Ventura Community Locker, Ventura	Dec 15, 1971
Guttenberg Locker, Guttenburg	Jan 5, 1972
Wilton Locker, Wilton Junction	Jan 12, 1972
Hopkinton Locker, Hopkinton	Jan 5, 1972
Community Lockers, Victor	Jan 12, 1972
Meyer's Locker and Superette Service, Lawler	Jan 6, 1972
D&K Locker Service, Richland	Jan 4, 1972
Franker's Frozen Food Center, Laurens	Dec 16, 1971
Villisca Locker, Villisca	Jan 7, 1972
Thompsons's Processing Service, Bloomfield	Jan 10, 1972
Arlington Locker Service, Arlington	Jan 6, 1972
Gilmore City Locker, Gilmore City	Dec 15, 1971
Wall Lake Locker, Wall Lake	Dec 13, 1971
Brooks Meat Plant (Widmer's), Wayland	Jan 13, 1972
Lockridge Locker Plant, Lockridge	Jan 4, 1972
Radcliffe Frozen Foods, Radcliffe	Dec 14, 1971
MARYLAND	
Official plants	
Benson Meats, Fallston	May 17, 1972
Roy L Hoffman, Hagerstown	May 31, 1972
Brook Meadow Provision Co , Hagerstown	May 23, 1972
W W Will, Sykesville	June 12, 1972
Shuff's Meats, Thurmont	May 18, 1972
Dixon's Butcher Shop, Waldorf	June 1, 1972
Read's Inc , Baltimore	May 17, 1972
Sepp's Market, Aberdeen	May 16, 1972
Mrs Bee's Packing Co , Baltimore	May 17, 1972
Hilltop Beef and Provision Company, Baltimore	May 17, 1972
Universal Meat Products, Inc , Baltimore	May 17, 1972
Cecil Provision Company, Elkton	May 15, 1972
Custom plants	
Denwood Bowman, Carson	May 16, 1972
Michael Kozub, Abingdon	May 16, 1972
MISSOURI	
Official plants	
Utters Meat Processing, Reeds	May 25, 1972
Roseville Packing Co , Springfield	May 23, 1972
Mott's Food Lockers, Rockville	June 6, 1972
Slagle Meat Market, Bolivar	May 24, 1972
Bouchaert Packing Co , St Louis	May 23, 1972
The Freezer, Doniphan	May 9, 1972
Pleasant Hill Meat Co , Pleasant Hill	June 7, 1972
Murphy Slaughterhouse, Farmington	May 10, 1972

<u>Name and location</u>	<u>Date of visit</u>
MISSOURI (continued)	
Official plants (continued)	
Maryville Packing Co , Maryville	June 7, 1972
Leotta's Market, St Louis	May 23, 1972
Gus Meat Co , Affton	May 24, 1972
Gold Kamp Meats, Inc , St Louis	May 16, 1972
A-1 Meat Company, Springfield	May 24, 1972
El Rey Meat Co , Inc , Ferguson	May 16, 1972
G&W Meat Co , St Louis	May 23, 1972
Sprague Locker, Brookfield	May 9, 1972
Fortner-Farrell, Inc , Springfield	May 23, 1972
D'Angelo Meat Co , Inc , St Louis	May 15, 1972
Goldstein Bros Meat Co , Kansas City	May 8, 1972
Grasso's Ravioli, St Louis	May 15, 1972
Woods Locker and Abattoir, Bowling Green	May 24, 1972
Kuna Meat Co , St Louis	May 15, 1972
Ferguson Meat Co , Independence	May 8, 1972
Custom plants	
Stockton Locker, Stockton	May 23, 1972
Walby Service, Excelsior Springs	May 12, 1972
Ava Locker Plant, Ava	May 11, 1972
Loughridge Processing Plant, Cabool	May 11, 1972
Stover Frozen Food Locker, Stover	May 25, 1972
Corder Locker Plant, Corder	May 25, 1972
Wheaton Frozen Food, Wheaton	May 22, 1972
Summer's Grocery and Locker, Huntsville	May 10, 1972
Grimes Locker Service, Newton	May 9, 1972
Mr Meat, New Hampton	May 11, 1972
J&L Supply, Grandby	May 24, 1972
Thayer Processing Plant, Thayer	May 9, 1972
Ava Slaughterhouse, Ava	May 11, 1972
Shomaker United Locker, Bucklin	May 9, 1972
Herb's Locker and Slaughter, Sullivan	May 23, 1972
Lawson Locker, California	May 25, 1972
Mire's Slaughter House, Barnard	May 11, 1972
Hermitage Locker Plant, Hermitage	May 23, 1972
Humansville Slaughter, Humansville	May 23, 1972
McCrea's, Inc , King City	May 11, 1972
Fulton Locker, Fulton	May 22, 1972
Pocahontas Meat Processing, Pocahontas	May 10, 1972
KENTUCKY	
Official plants	
Columbia Locker and Market, Columbia	Sept 12, 1972
University of Kentucky Meat Lab, Lexington	Sept 6, 1972
Wilson Bros Ham House, Lexington	Sept 7, 1972
Keifer Company, Louisville	Sept 11, 1972
David E Wallace, Boston	Sept 8, 1972
Mike's Ham House, Scottsville	Sept 12, 1972
Bullmer Provision Co , Paducah	Sept 13, 1972
Roby's Foods, Inc , Louisville	Sept 11, 1972
Custom plants	
Mahler Brothers, Mt Sterling	Sept 6, 1972
Poyner's Custom Slaughter, Lynnville	Sept 13, 1972
Pendleton County Frozen Food Bank, Falmouth	Sept 7, 1972
Shifflett's Custom Slaughter, Richmond	Sept 7, 1972
Gene Souleyrette, Burgin	Sept 8, 1972
Midway Locker, Midway	Sept 14, 1972
Scott's Custom, Cave City	Sept 14, 1972

APPENDIX V

<u>Name and location</u>	<u>Date of visit</u>
MINNESOTA	
Official plants	
Carlson Frozen Meat Sales, Grove City	Aug 15, 1972
Ruck's Meat Processing Center, Inc , Belle Plaine	Aug 14, 1972
Greggwood Farm, St Bonifacius	Aug 7, 1972
La Croix Meats, Grand Rapids	Aug 8, 1972
Richfield Meats, Inc , Richfield	Aug 16, 1972
Blue Mound Catering Service, Inc , Luverne	Aug 23, 1972
Randy's Frozen Meats, Faribault	Aug 18, 1972
Brix, W C & Sons Fine Foods, Minneapolis	Aug 16, 1972
Wilson's Meat Market, Karlstad	Aug 9, 1972
Concord Distributing Co , Minneapolis	Aug 23, 1972
Davis Meats, Minneapolis	Aug 16, 1972
Custom plants	
Trimont Locker, Trimont	Aug 21, 1972
Winnebago Locker, Winnebago	Aug 21, 1972
Huisken Locker, Chandler	Aug 22, 1972
E&T Meat, Kerkhoven	Aug 14, 1972
Lorentz Meat Processing and Locker, Cannon Falls	Aug 17, 1972
Mackenthum Slaughter House, Norwood	Aug 14, 1972
Wiste Food Market, Janesville	Aug 18, 1972
Waterford Meat Market, Waterford	Aug 17, 1972
Milroy Coop Creamery Association, Milroy	Aug 22, 1972
Corcoran Locker Plant, Hamel	Aug 7, 1972
Corvuso Slaughterhouse, Cosmos	Aug 14, 1972
Fertile Lockers, Fertile	Aug 8, 1972
Dennison Locker, Dennison	Aug 17, 1972
Ebnet Bros Market, Holdingford	Aug 10, 1972
Sorenson Meat & Lockers, Albert Lea	Aug 21, 1972
Dalton Locker Plant, Dalton	Aug 9, 1972
Annandale Coop Creamery, Annandale	Aug 15, 1972
Don's Butcher Shop, Springfield	Aug 22, 1972
Helland Superette, Alden	Aug 21, 1972
Greenbush Locker Plant, Greenbush	Aug 8, 1972
NEBRASKA	
Official plants	
Blinde's Locker Plant, Johnson	Aug 7, 1972
Epler Mercantile Co , Julian	Aug 8, 1972
Valentine Locker, Valentine	Aug 17, 1972
Deerson's Meat Plant, Inc , Elkhorn	Aug 9, 1972
Trautman's Meat Center, Lexington	Aug 15, 1972
City Meat Market, Nebraska City	Aug 8, 1972
Wimmer's Meat Products, Inc , West Point	Aug 8, 1972
Custom plants	
Crofton Locker, Crofton	Aug 18, 1972
Houser Locker, Bruning	Aug 11, 1972
Stuart Locker, Stuart	Aug 17, 1972
Harold's Grocery & Locker, Hickman	Aug 7, 1972
Culbertson Locker, Culbertson	Aug 15, 1972
Anderson's Market, Long Pine	Aug 17, 1972
Norfolk Frozen Food Center, Norfolk	Aug. 9, 1972
Kearney Locker and Storage, Kearney	Aug 14, 1972
Wakefield Locker, Wakefield	Aug 18, 1972
K&F Locker Store, Wilbur	Aug 11, 1972
Harrison Locker, Harrison	Aug 16, 1972

UNITED STATES DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE  
WASHINGTON D C 20250

Aug 9 1973

Mr. Richard J Woods  
Assistant Director, Resources and Economic  
Development Division  
U S General Accounting Office  
Washington, D.C. 20548

Dear Mr. Woods.

We are pleased to submit our response to your proposed draft to Congress on matters pertinent to this Agency's administration of intrastate meat plant inspection programs

The draft report is generally objective as well as informative We note and appreciate your acknowledgment of the progress that has been made by the States and the Department since the Wholesome Meat Act was passed in December 1967 We are proud of the achievements that have been made in such a short time in this important consumer protection area.

Your recommendations for eliminating, or at least minimizing, inconsistencies within the system are well received Portions of them have already been implemented and others are in the final stages of preparation

Specific recommendations to the Secretary of Agriculture were that APHIS

" provide reviewers with criteria for rating plants that can be applied with a high degree of uniformity and that specify the review findings which require a plant to be rated 'unacceptable '

" establish and advise the State of the criteria, including the percentage of its plants that must meet Federal requirements that will be used in determining when its program is equal to the Federal program and when the State will be notified formally that the Department is considering designation

" consider using random samples of plants selected quarterly as a basis for determining and reporting the status of State meat inspection programs "



## APPENDIX VI

Mr. Richard J. Woods

In response to your recommendations, we are taking the following action

We are in the final stages of revising a directive which pertains to the review and evaluation of both State and Federal inspection systems. It is intended that the revised directive will

1. Provide for more uniformity and clarification of requirements for acceptability of both State and Federal establishments. Attention will be directed to reviews of former State plants in designated States to assure that the same level of acceptability is being maintained as will be required for existing State plants.

2. Establish a deficiency level percentage which will require a warning letter to State officials apprising them of unacceptable conditions affecting the certification status of their inspection programs and the conditions requiring notification to the State of possible designation by the Department. The deficiency level or conditions established must remain flexible so informed judgment can be exercised in correlating the other factors affecting the status of the inspection program in making a final assessment. Also, adjustments will be necessary from time to time to meet changing inspection procedures and technology. Any such adjustments would be preceded by notification to interested and affected parties.

3. Provide for a statistical quarterly random selection of plants to be reviewed. As of April 1973, we discontinued the 100 percent plant review and initiated a policy which calls for reviewing 50 percent of the intrastate plants, plus any plants that were rated "unacceptable" in 1972. This procedure will be in effect until a statistical sampling plan can be implemented.

The directive will clarify the criteria for the reviewer and should result in (1) more uniform rating of plants, (2) help identify problems requiring correction, and (3) provide a better basis for evaluating and determining the status of State systems.

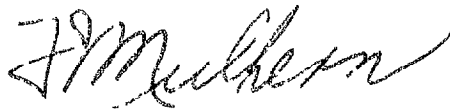
[See GAO note, p. 47.]

Mr. Richard J. Woods

[See GAO note.]

Thank you for the opportunity to respond to your report.

Sincerely,

A handwritten signature in cursive script, appearing to read "F. J. Mulhern".

**F. J. Mulhern**  
Administrator

GAO note. Additional comments were considered in preparing our final report but are not reproduced here.

PRINCIPAL OFFICIALS OF  
THE DEPARTMENT OF AGRICULTURE  
RESPONSIBLE FOR ADMINISTERING  
ACTIVITIES IN THIS REPORT

	<u>Tenure of office</u>	
	<u>From</u>	<u>To</u>
SECRETARY OF AGRICULTURE		
Earl L. Butz	Dec. 1971	Present
Clifford M. Hardin	Jan. 1969	Nov. 1971
Orville L. Freeman	Jan. 1961	Jan. 1969
ASSISTANT SECRETARY, MARKETING AND CONSUMER SERVICES		
Clayton Yeutter	Jan. 1973	Present
Richard E. Lyng	Mar. 1969	Jan. 1973
Vacant	Feb. 1969	Mar. 1969
Ted J. Davis	Sept. 1968	Jan. 1969
Vacant	June 1968	Sept. 1968
George L. Mehren	Sept. 1963	May 1968
ADMINISTRATOR, ANIMAL AND PLANT HEALTH INSPECTION SERVICE		
Francis J. Mulhern	May 1972	Present
Francis J. Mulhern (acting)	Apr. 1972	May 1972
ADMINISTRATOR, CONSUMER AND MARKETING SERVICE (note a)		
George R. Grange (acting)	Jan. 1972	Mar. 1972
Clayton Yeutter	Oct. 1970	Jan. 1972
George R. Grange (acting)	July 1970	Oct. 1970
Roy W. Lennartson	Feb. 1969	July 1970
Roy W. Lennartson (acting)	Jan. 1969	Feb. 1969
Rodney E. Leonard	Dec. 1967	Jan. 1969

<sup>a</sup>Before April 2, 1972, activities discussed in the report were the responsibility of the Consumer and Marketing Service. Effective April 2, 1972, this agency was renamed the Agricultural Marketing Service and its meat and poultry inspection functions were transferred to APHIS



COMPTROLLER GENERAL OF THE UNITED STATES  
WASHINGTON, D C 20548

B-163450

To the Speaker of the House of Representatives  
and the President pro tempore of the Senate

This is our report pointing out that consumer protection would be increased if the Animal and Plant Health Inspection Service, Department of Agriculture, improved its administration of intrastate meat plant inspection programs.

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Director, Office of Management and Budget, and to the Secretary of Agriculture.

A handwritten signature in cursive script, reading "James B. Argets".

Comptroller General  
of the United States

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