




April 10, 1996

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TO: Regional Directors

FROM:

  
Mark T. Mina  
Assistant Deputy Administrator  
Regional Operations

SUBJECT: FSIS Directive 4610.6, Daily Duty Limitations for Inplant Inspectors Policy

The following information pertains to pre-operational sanitation with regards to FSIS Directive 4610.6, Daily Duty Limitations for Inplant Inspectors.

*Should downtime due to pre-operational sanitation deficiencies count toward the maximum 10 hour line time for performing post mortem inspection duties?*

***Yes. Pre-operational sanitation down time is not an emergency or uncontrollable circumstance and is thus not recorded as separate and apart from the 10 hour line time. If there is a mechanical breakdown before operations have started, the IIC could grant the establishment an extension to the 10 hour kill time if the breakdown meets the criteria (V.A.6.).***

***Also, there might be certain uncontrollable circumstances delaying pre-op sanitation, such as a tornado knocking out all power for 30 minutes, that may not be appropriate to include in the 10 hour rule for slaughter.***