

On completing a Specialized Meat Processing Variance Request Form

Retail food establishments in Michigan that add cure to meat products need to complete the Specialized Meat Processing at Retail Food Establishments Variance Request (form FI-246).

At first glance this form may appear to be way too long and way too complicated. However, we hope that once you roll up your sleeves and dive in, you will find that it is not so bad.

Hopefully, by the time you sit down to fill out the form you will have some understanding of why it is required, how to completing it, how the approval process works, how to implement the approved plan and what will be expected at your next inspection.

The process for getting your variance approved should start with a discussion with your area food inspector to make sure you need a variance and to make sure that your facility will meet the basic requirements for a food establishment license and that you have the facilities to produce cured meat products in your establishment safely.

Once the variance filled out and submitted the area processing senior inspector will review your application for completeness, if more information is needed or the form is not completely filled out you will receive a letter letting you know what we need to finish reviewing your application.

After the application is complete, the processes and products will be reviewed to ensure that the product is properly cured, that the product will be adequately treated to kill pathogens, and that it will be handled so as to reduce the chances of being contaminated with pathogens after it is processed. We also need to ensure it remains safe through its shelf life.

Once this review is completed your area inspector and the processing senior inspector will conduct an operational inspection. This inspection occurs while you are processing your product and gives the inspectors a chance to see how your procedures are implemented. They will monitor your smokehouse and for some products, such as jerky, they will evaluate the humidity in the smokehouse during the cooking step to ensure that the process will effectively destroy pathogens. There are cook processes that do not require humidity, if you use one of these approved processes, humidity during the cook step does not need to be monitored or recorded.

The Food Code also requires us (Michigan Department of Agriculture and Rural Development) to ensure that the variances we approve will protect public health. MDARD is committed to helping establishments get variances approved that are protective of public health and allow the production of cured products.

Upon successful completion of this process you will receive a variance approval letter.

After you receive an approval changes to your process, including documentation, must be discussed with your area inspector. Your approved variance only applies to the

processes and products listed and approved. In some cases, changes will not need any further action by you, in others an amended application will need to be submitted.

During routine inspections your area inspector will be evaluating your facility, practices, equipment and most importantly, records, to ensure that you are adhering to the products and processes in the approved application. Products not produced by the approved methods may be suspected of being adulterated and removed from sale.

In all cases the best bet is to ask questions and get answers.

A couple specific points:

- Jerky and jerky like products must be cooked with adequate humidity in the smokehouse to effectively kill the pathogen Salmonella, Listeria monocytogenes, and pathogenic E. coli.
- Humidity measurement requires the use of a wet bulb and dry bulb thermometer in the smokehouse. See the “Humidity During Processing” appendix.