Attachment 9.I Protocol for Commercial Egg Processing Plant Biosecurity Audits[1]

For additional information on the Voluntary Preparedness Components of the Secure Egg Supply Plan, which enables egg processors to be audited prior to an outbreak to facilitate egg and egg product movement in an HPAI outbreak, please see www.secureeggsupply.com.

Processing Plant Biosecurity Audit

1. To begin the process of plant inspections, an Initial Expert Audit is conducted.
2. As a result of this inspection, a signed Commercial Egg Processing Compliance Agreement is established to outline the requirements for ongoing biosecurity for each premises.
3. Thereafter, routine, on-site biosecurity audits are conducted by the Egg Processing Biosecurity Team.
4. Observations of deficiencies in the plant's biosecurity plan, suggested corrective actions, and other recommendations for improvement are communicated in a written follow-up report.

Audit Frequency/Scheduling

1. The assigned CPL, in consultation with other members of the Egg Processing Biosecurity Team, determines how often reviews should be conducted. The accepted "default" frequency to evaluate biosecurity is every 30 days. In those instances where plants have adopted sufficient biosecurity plans, it may not be necessary to visit every month (visits may only be needed every 60–90 days). Higher risk, less biosecure facilities may need to be visited more often than monthly.
2. Review the Commercial Plant Visitation Schedule listing the dates the plants have been visited previously and any future visits. .
3. Update the Egg Processing Biosecurity Visit Schedule spreadsheet regularly because it depicts who will be conducting each audit visit.
4. When the Control Area is released and egg processors are released from their individual HPAI Quarantines, then egg processing inspections by response personnel will cease.

Initial Contact

1. Review the Commercial Visitation Schedule to identify facilities that have not been visited in the past 30 days.
2. Select the candidate premises eligible for inspection.
3. Contact the owner or manager when scheduling a Biosecurity Survey and make them aware that the facility will be visited.

[1] The following procedures are for government response personnel assigned to perform biosecurity audits in commercial egg processing plants.

4. Log the scheduled visit into the To Do List file in your personal folder. Print a copy and post in the Commercial Planning Section shared folder for team members to reference.

Preparation and Equipment Needed for Biosecurity Survey

1. Review the last Biosecurity Survey as well as previous directions and recommendations.
2. A copy of the Compliance Agreement, plastic clipboard, and some blank paper are needed for taking notes.

Arrival at the Facility

1. Park in a place that is commonly used for parking and avoid entering any “dirty” zone with the vehicle.
2. Put the coverall suit on inside the vehicle as instructed, gather all note-taking materials, and review the previous recommendations in order to note whether they have been implemented when touring the facility.
3. Ask questions and take notes about the facility and its employees. Before leaving the facility, review the Egg Biosecurity Issues checklist to see if any key points of interest have been overlooked.
4. Use footbaths and hand sanitizers upon entry, exit, and crossing between “clean” and “dirty” zones within the facility.

Departing from the Facility

1. Place all notes into a zip-lock bag facing back to back where the notes can be read when filling out the Biosecurity Survey Report later.
2. Spray the vehicle tires and wheel wells or pressure wash with a 1 percent disinfectant solution before leaving the premises. Spray the plastic clipboard with disinfectant and place inside a zip lock bag.
3. Remove the coverall suit as outlined in the Health and Safety and PPE SOP.

Biosecurity Reports and Synopsis

1. Upon arrival back at the ICP, base or camp, wash the plastic clipboard.
2. Draft updated report. After the report is finished, properly dispose of the notes in the zip-lock bag.
3. Print 3 copies of the final report. File one copy in the designated folder. Pass the other two copies to the Commercial Poultry Planning Group Supervisor for review. When approved, one copy is retained by the Deputy Supervisor and the other copy is mailed to the premises owner.
4. Update the EMRS Investigation Summary.

Egg Flat Washer Audit

1. In addition to periodic processing biosecurity surveys, egg flat washer audits may be needed.
2. An Egg Flat Addendum to the Commercial Poultry Compliance Agreement is available to those plants wishing to switch back from paper to plastic flats for incoming eggs. Even though processing plants prefer plastic egg flats over paper disposable, the response team considers their use a significant risk factor for spreading HPAI. The plant must agree to certain stipulations, listed in the Addendum (see attached excerpt), that minimize the risk of HPAI virus being disseminated to other premises through re-usable plastic flats.
3. A Flat Washer Audit Checklist can be used as worksheet for those requirements and should be mailed in advance to give plants notice of what is expected of their facilities on the initial visit.

NOTE: If the outcome of the initial inspection proves to be satisfactory, the CPL submits the Checklist and draft Addendum including the added "specific requirements for the premises" to the Group supervisor for review. Only after approval, can an officially authorized Egg Flat Addendum be sent to the producer for signature allowing for the switchover to plastic flats. A signed-off Flat Washer Audit Checklist alone does not authorize use of plastic flats.

Visits

Processing plants wishing to switch to plastic flats should contact the response team to request an initial audit when they feel they are adequately prepared. Thereafter, plants must be audited periodically to ensure ongoing compliance with the Egg Flat Addendum. Inspection procedures adhere to those for the standard Biosecurity Survey/Review with the following points:

1. Use the Flat Washer Audit Checklist as a tool in determining whether the plant is in compliance by properly cleaning and sanitizing the plastic flats and racks before they leave the plant. At minimum, the plant should have written standard operating procedures on file and thorough washer operating checklists or log books in place at critical points of the washing procedures. Each washer Group in the facility must be audited during the visit.
2. When approved (signed), make two copies of the Egg Flat Addendum and have the plant owner sign all three documents.
3. Make 2 photocopies of the completed Audit Checklist.
4. File the 3 sets of documents (the Addendum plus Checklist) as follows:
   a. A copy for the plant.
   b. A copy for Commercial Poultry Planning kept on file with the rest of that company's documents.
   c. A set including both originals to be mailed to the State Veterinarian's office (give to the Administrative Assistant for the Commercial Poultry Planning Group).
5. On subsequent visits, file 3 copies of the Audit Checklist as above.
6. Egg processing plants recently switching from paper to plastic egg flats should initially be monitored every 30 days.