



Robotic Stackers - Control of USDA Product

POLICY

AMS field personnel are expected to observe grading activities on a continuous basis and ensure all official samples are properly selected, identified, and controlled. As this relates to control of individual grade lines in shell egg production facilities, it is expected that facility management adopt a system which will permit segregation of product represented by unsatisfactory samples. USDA provides marker labels to assist with identification and thus segregation, however, for marker labels to be effective it is required that the sample container be placed in proper sequence, with the USDA marker label plainly visible on the outside of the pallet when stacked. This would also apply to "X" marker labels applied to identify and control product when multiple lines are combined.

Some robotic case stacking systems are not capable of assuring containers bearing USDA marker labels are placed (or stacked) in proper sequence, with the USDA marker label plainly visible on the outside of the pallet. This creates a situation where USDA personnel are unable to maintain effective control of grade lines, especially in times of retention. Robotic systems that do have the capability, often require an inordinate amount of time trying to count and sequence the placement of sample containers so that the robotic systems will place it properly on the pallet. This level of detail is taxing for USDA graders familiar with the robotic system's process and unreasonable to expect of relief personnel to figure out during their brief time in the facility.

Some facilities using robotic stacking systems may be required to develop an alternative method for identifying official samples and sampling intervals. Any method facility management presents must provide for positive control and be approved by the Federal-State supervisor. A description of the plant's current system is to be kept in the "Information for Relief Grader" file folder 2. An example of an acceptable alternative system would be the use of time stamping on cases or case labels. An unsatisfactory method would be any method where USDA personnel did not have complete verification that all product represented in sampling periods were accounted for, such as allowing company personnel to locate and segregate product in the absence of USDA personnel.

Failure to present an approved system for identifying official samples and sampling intervals from robotic stackers may result in retention of product up to the last verifiable control point.

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