

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE	17-12	3/2/12
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**VERIFICATION OF ANTIMICROBIAL INTERVENTION COVERAGE OF CARCASS
OR PRODUCT AT VEAL SLAUGHTER AND BEEF FABRICATION
ESTABLISHMENTS**

I. PURPOSE

This notice provides instructions to Inspection Program Personnel (IPP) assigned to veal slaughter establishments or beef fabrication establishments for verifying that establishments' antimicrobial interventions properly cover the carcasses or products.

II. BACKGROUND

A. FSIS test results show that the percent positive for *E. coli* O157:H7 from ground beef and raw ground beef components produced from veal appear to be higher than ground beef and raw ground beef components produced from other cattle slaughter classes.

B. Following up on these results, FSIS conducted a review of Food Safety Assessments (FSAs) and onsite visits to veal slaughter establishments to identify concerns unique to veal slaughter. The results of the review indicate a common deficiency. Specifically, veal slaughter establishments, in applying their antimicrobial interventions, failed to achieve carcass coverage because of the practice of suspending carcasses from the rail system with both hind limbs on a single hook (see Attachment 1). Because of this practice, antimicrobial or hot water interventions, such as sprays, did not reach all parts of the carcasses. Carcass coverage -- ensuring that the entire carcass surface is treated -- is necessary for the intervention to operate effectively and as intended. As a result of the incomplete carcass coverage, interventions were likely less effective than intended, and this ineffectiveness may have contributed to the production of products contaminated with *E. coli* O157:H7.

C. In addition, during on-site visits to beef fabrication establishments, FSIS found that beef fabrication establishments, in applying their antimicrobial intervention, had also failed to achieve product coverage. Reasons for inadequate application of the antimicrobial intervention to all product surfaces included the stacking of products and the folding of longer pieces, particularly loins. These actions prevented antimicrobial sprays from reaching all product surfaces. Additionally, establishment personnel failed to address these actions by adjusting the conveyor belt timing, properly designing spray

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applications, and ensuring that product was single-stacked and lying flat so that all product surfaces received the antimicrobial spray. Product coverage – ensuring that all of the product is treated – is necessary for the intervention to operate effectively and as intended.

D. 9 CFR 417.2(a) requires that an establishment identify any food safety hazards that might occur in the production process, assess which hazards are reasonably likely to occur, and develop measures to prevent, eliminate, or reduce to an acceptable level those hazards that are. The establishment must maintain documents supporting the decisions that it makes during the hazard analysis. 9 CFR 417.2(c)(3) requires that the establishment develop critical limits for Critical Control Points (CCPs) to control hazards that are reasonably likely to occur. If an establishment does not implement its CCP so that its critical limit is met, the CCP is not effectively controlling the hazard. Therefore, the Hazard Analysis and Critical Control Point (HACCP) plan would not be designed to control the hazard (9 CFR 417.2(a)(1)), which would call into question the adequacy of the HACCP system (9 CFR 417.6).

E. If the establishment fails to implement its antimicrobial intervention so that its critical limits (including carcass/product coverage) are met, the CCP is not effectively controlling the hazard (9 CFR 417.2(c)(3)).

F. An establishment may determine that a hazard is not reasonably likely to occur because the establishment maintains a prerequisite program that prevents the hazard from occurring. If an establishment does not effectively implement its prerequisite program (9 CFR 417.5(a)(1)), a hazard is not prevented, and therefore the HACCP plan would not be designed to control the hazard (9 CFR 417.2(a)(1)), which would call into question the adequacy of the HACCP system (9 CFR 417.6).

G. The establishment may have determined that *E. coli* O157:H7 is not reasonably likely to occur because of use of an antimicrobial intervention in its sanitation SOP or other prerequisite program. The establishment's failure, to implement adequately its antimicrobial intervention Sanitation Standard Operating Procedures (Sanitation SOPs) or other prerequisite program results in a hazard, *E. coli* O157:H7 that is not prevented. Therefore, the HACCP plan would not be designed to control the hazard (9 CFR 417.2(a)(1)).

III. INITIAL INSPECTION PROGRAM PERSONNEL RESPONSIBILITIES

A. After receipt of this notice, at the next week weekly meeting, IPP assigned to veal slaughter and beef fabrication establishments are to meet with establishment management to discuss the information in this notice. IPP are to inform establishment management that:

1. IPP will be reviewing the establishment's antimicrobial intervention control measures (whether incorporated in the HACCP plan as CCPs or addressed in Sanitation SOPs or other prerequisite programs) and observing the establishment implementing its antimicrobial interventions.
2. The purpose of this activity is to verify that the establishment has incorporated carcass or product coverage into its antimicrobial intervention control measures

(in CCPs, Sanitation SOPs, or other prerequisite programs), and that the establishment is implementing its interventions so that the intervention achieves carcass and product coverage.

3. IPP will be performing this verification no earlier than one week following the date of this initial meeting but within 30 days of the initial awareness meeting.
4. If the establishment does not ensure that antimicrobials cover the carcass or the product, the establishment's HACCP system may not adequately address *E. coli* O157:H7.

B. IPP are to document this meeting in a Memorandum of Interview (MOI) according to [FSIS PHIS Directive 5000.1, Verifying an Establishment's Food Safety System](#) and provide a copy to establishment management.

IV. HACCP VERIFICATION

A. IPP are to perform a directed HACCP Implementation Procedure (HIP), as described in [FSIS PHIS Directive 5000.1, Verifying an Establishment's Food Safety System](#) no earlier than one week following the weekly meeting in Section III.A.1. and no later than 30 days of the initial awareness meeting.

B. IPP are to perform both components (recordkeeping review and observation) of the procedure when they perform the HIP verification.

C. While performing the recordkeeping review component, IPP are to review the establishment's records on its antimicrobial intervention control measures (as CCPs or in Sanitation SOPs or prerequisite programs). IPP are to verify the establishment has incorporated carcass or product coverage into its antimicrobial intervention control measures.

D. While performing the observation component, IPP are to verify that the establishment is implementing its antimicrobial intervention so that the intervention achieves carcass or product coverage.

E. If IPP have concerns about the adequacy of the HACCP system, they are to discuss their concerns with their supervisor.

F. Attachment 1 depicts the slaughter practice of suspending a carcass from the rail system with both hind limbs on a single hook. IPP at veal slaughter establishments are to review the picture in Attachment 1. IPP are to use this picture to assist them in verifying that establishments implement antimicrobial interventions so that the intervention achieves carcass coverage.

G. IPP are to record any non-compliances identified on an NR according to [FSIS PHIS Directive 5000.1, Verifying an Establishment's Food Safety System](#).

V. DATA ANALYSIS

Members of the Risk, Innovations, and Management Division (RIMD) will analyze data from *E. coli* O157:H7 sampling programs. Additionally, the Office of Policy and Program Development with Office of Program Evaluation and Enforcement Review will conduct a web-based survey within 6 weeks of issuing this notice to help assess this notice's effectiveness. The brief survey consists of questions on the notice. A random sample (generated by Program Evaluation & Improvement Staff (PEIS)) of Inspectors-in-Charge (IICs) of veal slaughter and beef fabrication establishments will receive an email giving instructions on accessing and completing the web-based survey.

Refer questions regarding this notice to the Risk, Innovations, and Management Division through askFSIS at <http://askfsis.custhelp.com> or by telephone at 1-800-233-3935 (press 2 and then press 3).

A handwritten signature in black ink, appearing to read "David Joseph". The signature is fluid and cursive, with a prominent loop at the end.

Assistant Administrator
Office of Policy and Program Development

Attachment 1

Example of Veal Carcass with Hind Limbs Suspended from One Hook

