

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

FSIS NOTICE

30-12

4/27/12

**FSIS VERIFICATION TESTING FOR NON-O157 SHIGA-TOXIN PRODUCING
ESCHERICHIA COLI (NON-O157 STEC) IN IMPORTED PRODUCT
UNDER THE MT51 SAMPLING PROGRAM**

I. PURPOSE

A. This notice provides import inspection personnel with information on non-O157 Shiga toxin-producing *Escherichia coli* (STEC) laboratory tests that will be performed on imported beef manufacturing trimmings collected under the existing *Escherichia coli* (*E. coli*) O157:H7 sampling program MT51. This testing applies only to samples of imported beef manufacturing trimmings from cattle slaughtered on or after June 4, 2012. A separate FSIS Notice addresses sampling and testing of domestic beef manufacturing trimmings at originating slaughter suppliers. Until instructed otherwise, beef manufacturing trimmings (but not ground beef, bench trim, or other components of ground beef such as cheek meat, head meat, or other components described in FSIS Directive 10,010.1 Rev 3.) will be tested for relevant non-O157 STECs. FSIS will test beef manufacturing trimmings for the six relevant non-O157 STEC serogroups (O26, O45, O103, O111, O121, and O145).

B. Product sampled under the MT51 sampling program at official import inspection establishments may contain both beef manufacturing trimmings and other components (such as cheek meat, head meat, or other components described in FSIS Directive 10,010.1). Sampled lots containing only beef manufacturing trimmings will be tested for non-O157 STECs. Sampled lots containing any amount of another component will be tested for *E. coli* O157:H7 only.

C. At a later date, FSIS laboratories will implement non-O157 STEC testing in other sampling programs, including MT08 (Routine Testing of Imported Raw Ground Beef). FSIS will issue both a *Federal Register* notice and an FSIS Notice reflecting these changes before FSIS begins testing these additional raw beef products for the six non-O157 STECs.

II. BACKGROUND

Because of the public health concern regarding the non-O157 STEC serogroups, in 2011, FSIS announced in a *Federal Register* notice its intent to declare at least six non-

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NOTICE EXPIRES: 5/1/13

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O157 STECs (O26, O45, O103, O111, O121, and O145) adulterants in non-intact raw beef products and product components (<http://www.fsis.usda.gov/OPPDE/rdad/FRPubs/2010-0023.pdf>). On June 4, 2012, FSIS will begin testing imported beef manufacturing trimmings (but not other components of ground beef, such as cheek meat, head meat, or other components described in FSIS Directive 10,010.1 Rev 3.) collected from cattle slaughtered on or after June 4, 2012, for the six non-O157 STECs. To provide foreign countries time to comply with the new policy, lots presented for import reinspection containing any amount of beef manufacturing trimmings collected from cattle slaughtered before June 4, 2012, will be analyzed for *E. coli* O157:H7 only. Foreign countries have been notified and have the option to provide slaughter dates on the official foreign inspection certificate.

III. IMPORT INSPECTION PERSONNEL RESPONSIBILITIES FOR OFFICIAL IMPORT INSPECTION ESTABLISHMENT AWARENESS MEETING

Import inspection personnel are to discuss non-O157 STEC testing with official import establishment management during the next weekly meeting and document the meeting in a Memorandum of Interview (MOI) as instructed in [FSIS Directive 5010.1](#). Import inspection personnel are to share the following information with the establishment:

1. Samples of raw beef manufacturing trimmings that are from cattle slaughtered on or after June 4, 2012, collected under the MT51 sampling program, will be tested by FSIS for non-O157 STECs as well as *E. coli* O157 H7. Explain the following key points:
 - a. Starting June 4, 2012, if the slaughter date of any amount of the raw beef manufacturing trimmings in the lot presented for import reinspection is prior to June 4, 2012, or if the slaughter date is unknown, FSIS laboratories will only analyze these samples for *E. coli* O157:H7 until instructed otherwise.
 - b. If the lot presented for import reinspection contains material other than beef manufacturing trimmings (such as other components of ground beef) FSIS laboratories will analyze these samples for only *E. coli* O157:H7.
 - c. FSIS will analyze ground beef and other raw ground beef components other than beef manufacturing trimmings for only *E. coli* O157:H7, until the Agency announces that it will do otherwise.
2. When FSIS finds beef manufacturing trimmings positive for any of the relevant non-O157 STECs, FSIS's actions will be consistent with its actions in response to *E. coli* O157:H7 positive results (see Section VI below).
3. Notification of sampling is to be communicated to any brokers or importers of record that arrange for the reinspection at an official import inspection establishment; and
4. A copy of the MOI will be shared with official import inspection establishment management.

IV. IMPORT INSPECTION PERSONNEL RESPONSIBILITIES FOR COLLECTING AND SUBMITTING SAMPLES

A. When import inspection personnel receive a sample request for MT51, they are to follow the instructions in [FSIS Directive 10,010.1](#), Chapter VIII, for collecting samples. There are no changes to product sampling eligibility or sample collection procedures for the MT51 sampling program.

NOTE: Once the Public Health Information System (PHIS) is implemented for imports, all laboratory types of inspection (TOI) and associated laboratory forms used will be internal to the PHIS. Only laboratory forms that are generated from the PHIS are to be used or submitted to the FSIS labs at that time.

B. For each sample of beef manufacturing trimmings collected in the MT51 sampling program, import inspection personnel are to answer the following questions on the PHIS sample collection form. Import inspection personnel's responses to the questions are important, as they determine which analyses the FSIS laboratories will perform. Only when the answer to both questions below is "yes" will the sample be analyzed for non-O157 STEC.

C. Following some of the answer choices is guidance to assist import inspection personnel with answer selection.

1. Does the sampled lot contain beef manufacturing trimmings from cattle slaughtered only on or after June 4, 2012?

a. Yes

(Import inspection personnel are to select 'Yes' when they have verified that the entire sampled lot includes only beef manufacturing trimmings from cattle slaughtered on or after June 4, 2012, and does not contain any amount of beef manufacturing trimmings from cattle slaughtered before June 4, 2012.)

b. No

(Import inspection personnel are to select 'No' when the sampled lot includes any amount of beef manufacturing trimmings from cattle slaughtered prior to June 4, 2012, or when the slaughter date does not appear on the inspection certificate.)

2. Does the sampled lot contain only beef manufacturing trimmings and no other components?

a. Yes

(Import inspection personnel are to select 'Yes' when they have verified that the entire sampled lot is composed only of beef manufacturing trimmings and does not contain any amount of other components or other

material.)

b. No

(Import inspection personnel are to select 'No' when the sampled lot contains any amount of material other than beef manufacturing trimmings.)

V. OBTAINING SAMPLE RESULTS

A. Import inspection personnel are to access LEARN for sample results. The laboratories will report the results for both the *E. coli* O157:H7 and non-O157 STECs together for each sample in LEARN according to the Sample Request Form Number. Import inspection personnel are to obtain sample results for both *E. coli* O157:H7 and the six non-O157 STECs by accessing LEARN for each sample submitted. Import inspection personnel are to share these results with applicable brokers, importers, and official import inspection management personnel, when warranted.

B. "Not acceptable" positive test results for *E. coli* O157:H7 or any of the six non-O157 STECs are reported in LEARN as soon as each analysis is completed and reviewed. If the sample confirms positive for a non-O157 STEC, LEARN will display the specific non-O157 STEC serogroups for which it is positive. "Acceptable" test results are not reported in LEARN until after all sample analyses are completed, and the results comply with FSIS regulatory requirements.

NOTE: Results reporting for non-O157 STEC testing is not expected to take longer than for *E. coli* O157:H7 testing.

VI. IMPORT INSPECTION PERSONNEL ACTIONS FOLLOWING A POSITIVE FSIS TEST RESULT

Import inspection personnel are to follow the same actions for each analysis result as outlined in [FSIS Directive 10,010.1](#), Chapter VIII – Import Sampling, Section VI. Actions to Take Based on Results.

NOTE: The FSIS Office of International Affairs (OIA) will not request foreign governments to conduct a for-cause assessment in establishments in response to a non-O157 STEC positive sample collected and tested by FSIS for at least 90 days after June 4, 2012. FSIS recognizes that foreign establishments will be taking steps to address non-O157 STECs in their Hazard Analysis and Critical Control Point (HACCP) systems and performing activities to gather data to validate that their food safety systems are adequately designed to control for non-O157 STECs. FSIS OIA will communicate expectations following a positive result directly with the foreign government.

VII. DATA ANALYSIS

The Office of Public Health Science (OPHS) will analyze sample results for non-O157 STEC collected through the routine sampling programs. Specifically, OPHS will produce a weekly report on sample findings, and the Office of Policy and Program Development will produce an annual summary report that will be published on the FSIS Web site.

Approximately one year after the start of this program, the Data Analysis and Integration Group (DAIG) within the Office of Data Integration and Food Protection will analyze the sampling data to identify potential trends and to evaluate program effectiveness (e.g. sample scheduling and collection rates). Ad hoc analyses may be conducted within a year to address specific Agency questions.

IX. ASKFSIS QUESTIONS

FSIS has published askFSIS Questions and Answers on [non-O157 STEC](#) issues. Import inspection personnel can view the questions by searching the questions database on the askFSIS website.

Inspection program personnel are to refer questions regarding this notice to the OIA, Import Inspection Division (IID) at import.inspection@fsis.usda.gov or by telephone at 202-720-9904. Questions can also be submitted through askFSIS at <http://askfsis.custhelp.com>.

A handwritten signature in black ink, appearing to read "David J. Seibert". The signature is fluid and cursive, with a prominent initial "D" and "S".

Assistant Administrator
Office of Policy and Program Development