

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

FSIS NOTICE

48-11

9/6/11

ASSESSMENT OF THE HAZARDS ASSOCIATED WITH PORK BARBECUE WITH VINEGAR AND PEPPER-BASED SAUCE

I. PURPOSE

An analysis of FSIS testing data has shown that 23% of *Salmonella* positive samples from ready-to-eat (RTE) meat and poultry products are from pork barbecue with vinegar and pepper-based sauce. This notice provides instructions to inspection program personnel (IPP) for ensuring that establishments that produce pork barbecue with vinegar and pepper-based sauce assess the hazards associated with this product.

II. BACKGROUND

FSIS performed an analysis of *Salmonella* positives from 2005 to 2010, and found that pork barbecue products with vinegar and pepper-based sauce have been implicated in 23% of *Salmonella* positive samples from meat and poultry products. Although there have been no known illnesses linked to these products, the high rate of positive results for pork barbecue with vinegar and pepper-based sauce is of concern to the Agency. The source of the *Salmonella* in these types of products is not clear, although it may have come from the addition of contaminated ingredients (such as the pepper) to the sauce, or from cross-contamination of the product or sauce in the post lethality processing environment. During processing of these products, the pork was cooked first, and the barbecue sauce was added after the cooking step. The lack of a lethality treatment for the sauce or its ingredients (e.g. pepper or other spices) could result in contamination of the final product.

III. IPP RESPONSIBILITIES

A. At the weekly meeting following the issuance of this notice, IPP who are assigned to establishments that produce RTE pork barbecue product with vinegar and pepper-based sauce are to have an awareness meeting with plant management to discuss this notice. IPP are to document the meeting in a Memorandum of Interview (MOI) as described in FSIS Directive 5000.1, Verifying an Establishment's Food Safety System.

DISTRIBUTION: Electronic

NOTICE EXPIRES: 10/1/12

OPI: OPPD

B. IPP are to determine whether the establishment has evaluated the safety of ingredients added after the lethality step, as described in FSIS Notice 01-11, Instructions for Verifying all Steps In the Processing of Ready-to-Eat Meat and Poultry Products. As part of this review, IPP are to verify that the establishment has evaluated the interventions applied by its suppliers to the ingredients and spices that it receives. IPP are to verify that the establishment has determined whether its purchase specifications are met through, for example, certificates of analysis or other forms of documentation establishing the safety of the lots of raw materials, ingredients, or spices that it receives, and that the establishment performs any in-plant verification testing it has identified as necessary.

NOTE: Establishments may have changed their suppliers or formulation of ingredients since the hazards were last reviewed. If this has occurred, IPP are to determine whether the establishment considered these changes in its evaluation of the safety of the ingredients.

C. If the establishment has not evaluated the safety of its ingredients, and there is evidence that a hazard could exist, IPP are to issue an NR under the appropriate 03 ISP code. The NR would be issued because the establishment's failure to evaluate the safety of its ingredients creates an insanitary condition that could render the product injurious to health, and thus adulterated. Examples of hazards include:

--the addition of untreated ingredients to the product after the lethality treatment,
or

--evidence of cross-contamination with no additional post-lethality treatment of RTE products.

D. If IPP are uncertain as to whether a hazard exists, they are to contact the District Manager (DM) through their supervisory chain to discuss whether further actions are needed. These further actions could include gathering additional information, performance of Intensified Verification Testing (IVT) along with a "for cause" food safety assessment (FSA), collecting samples to be analyzed for pathogens of public health concern, or all of these actions.

IV. DATA ANALYSIS

Members of the Risk, Innovations, and Management Division (RIMD) will work with the Data Analysis and Integration Group (DAIG) to review the effectiveness of actions taken in establishments with *Salmonella* positives in RTE products to ensure that hazards have been addressed.

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.

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