ANALYSIS FOR SALMONELLA OF ALL IMPORTED BEEF PRODUCTS SAMPLED FOR SHIGA TOXIN-PRODUCING ESCHERICHIA COLI (STEC)

I. PURPOSE

This notice provides instructions for import inspection personnel to follow when collecting samples for Escherichia coli (E. coli) O157:H7 and other Shiga toxin-producing E. coli (STEC) that will also be analyzed for Salmonella.

KEY POINTS:

• Raw beef samples, including import MT08 and MT51 samples, collected for STEC analysis will also be analyzed for Salmonella

• Import inspection personnel are not to add a Salmonella type of inspection (TOI) for the analysis

• The Salmonella analysis result is non-regulatory, and if positive, the product is not a refused entry

• How notify the importer of record when a sample tests positive for Salmonella but is negative for STECs

II. BACKGROUND

On June 5, 2014, FSIS announced in the Federal Register (79 FR 32436) that raw beef samples collected for routine and follow-up sampling projects for STEC also will be analyzed for Salmonella. This new approach will allow FSIS to gather baseline data to determine the prevalence of Salmonella in ground beef and trim and to gather data necessary to propose new performance standards for ground beef. FSIS does not consider Salmonella an adulterant in raw meat products. Therefore, a positive test result for Salmonella in imported raw beef product, sampled by FSIS import inspection personnel, does not require a regulatory control action to be taken.

III. SAMPLE COLLECTION

When import inspection personnel receive an E. coli O157:H7 MT08 or E. coli O157:H7 MT51 TOI, under which imported boneless manufacturing trimming are also to be tested for STEC, they are to:

1. Collect samples following the sampling instructions in FSIS Directive 10,010.1.
Verification Activities for Escherichia coli O157:H7 in Raw Beef Products;

2. Continue to follow the instructions on notifying establishments about sample collection for STEC analysis that are set out in FSIS Directive 10,010.1; and

3. Inform official import inspection establishment management that all samples analyzed for STEC will also be analyzed for Salmonella. However, the importer of record (IOR) only has to hold and control the lot until the results for STEC are reported, provided there are no other unreported laboratory samples requiring the lot to continue to be held.

NOTE: Salmonella results reporting may take 1 – 3 days longer than STEC reporting.

IV. OBTAINING SAMPLE RESULTS

Import inspection personnel are to retrieve and view the sample results in LIMS-Direct or in the Public Health Information System (PHIS). The results will appear as shown below, displaying a Non-regulatory result for Salmonella sp., which will display as either ‘positive’ or ‘negative.’

A. (LIMS)-Direct:

<table>
<thead>
<tr>
<th>Analysis Result: Acceptable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Test</td>
</tr>
<tr>
<td>E. coli O157:H7</td>
</tr>
<tr>
<td>Non-O157 Shiga Toxin-Producing E. coli</td>
</tr>
<tr>
<td>Salmonella sp.</td>
</tr>
</tbody>
</table>

or

<table>
<thead>
<tr>
<th>Analysis Result: Acceptable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Test</td>
</tr>
<tr>
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<tr>
<td>Non-O157 Shiga Toxin-Producing E. coli</td>
</tr>
<tr>
<td>Salmonella sp.</td>
</tr>
</tbody>
</table>

B. PHIS:

<table>
<thead>
<tr>
<th>Result</th>
<th>Reported Name</th>
<th>Result Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>RL-Non-regulatory result</td>
<td>Salmonella sp.</td>
<td>Negative</td>
</tr>
<tr>
<td>11-Acceptable</td>
<td>E. coli O157:H7</td>
<td>Negative</td>
</tr>
<tr>
<td>11-Acceptable</td>
<td>Non-O157 Shiga Toxin-Producing E. coli</td>
<td>Negative</td>
</tr>
</tbody>
</table>

V. TEST RESULTS AND ACTIONS

A. For a positive STEC result, import inspection personnel are to follow the instructions set out in FSIS Directive 10,010.1 on responding to positive FSIS results for the adulterant STEC. Additionally, they are to access the Lot Manager page for the lot and initiate a refused entry by clicking on the Refused Entry button and on Add New Reason on the refused entry page. For Refusal Reason, select Failed Laboratory Analyses, and for Defects, select Tested Positive for Pathogens, and then Save the refused entry.
B. For a negative STEC result, import inspection personnel are to advise the IOR holding the
product that the lot does not need to continue to be held as the product has tested negative for
STEC.

C. For a positive *Salmonella* result, import inspection personnel are to advise the IOR the
sample tested positive for *Salmonella*, and that FSIS will not take any enforcement action. If the
STEC results reported as negative, the lot is free to move in commerce provided there are no
other unreported laboratory samples requiring the lot to continue to be held.

D. For a negative *Salmonella* result, import inspection personnel are to advise the IOR the
sample tested negative for *Salmonella*.

**NOTE:** When import inspection personnel receive the *Salmonella* result before the STEC
results, they are to wait to notify the IOR until after receiving the STEC results.

VI. *SALMONELLA* POSITIVE LOTS

When a sample reports positive for *Salmonella* and negative for STECs, and the IOR requests
that the lot not be stamped “U.S. Inspected & Passed” because the IOR wants to drawback the
entire or partial lot from the United States, import inspection personnel are to:

1. Request the IOR to provide one of the following completed Customs and Border
Protection (CBP) forms:
   a. **Form 7551, DRAWBACK ENTRY**;
   b. **Form 7552, DELIVERY CERTIFICATE FOR PURPOSES OF DRAWBACK**;
   or
   c. **Form 7553, NOTICE OF INTENT TO EXPORT, DESTROY OR RETURN
      MERCHANDISE FOR PURPOSES OF DRAWBACK**.

2. Review the form to verify the product and the amount of product coincides, at minimum,
with the kind of product and the weight of the product being withdrawn for the lot;

3. Attach the form to the case file;

4. Access the Lot Manager page for the lot in PHIS, select Lot Tracking, and select, as
appropriate, either “Entire Lot Withdrawn – Salmonella Positive” or “Partial Lot
Withdrawn – Salmonella Positive”; and
5. When all TOIs are completed, select Release Acceptable Units to close out the lot in PHIS.

**NOTE:** FSIS will not take any enforcement action or perform follow-up sampling on lots identified as a positive *Salmonella* result.

**VII. QUESTIONS**

Refer questions regarding this notice through your supervisor or submit your questions through askFSIS. When submitting a question, use the Submit a Question tab, and enter the following information in the fields provided:

- **Subject Field:** Enter *Notice 18-15*
- **Question Field:** Enter question with as much detail as possible.
- **Product Field:** Select *Import* from the drop-down menu.
- **Category Field:** Select *Basic Import Answers* from the drop-down menu.
- **Policy Arena:** Select International (Import/Export) from the drop-down menu.

When all fields are complete, press *Continue* and at the next screen press *Finish Submitting Question*.

**NOTE:** Refer to [FSIS Directive 5620.1](#), Using askFSIS, for additional information on submitting questions.

![Signature](signature.png)

Assistant Administrator  
Office of Policy and Program Development