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

FSIS NOTICE	39-14	8/13/14

CLARIFICATION AND EXPANSION OF SAMPLING ELIGIBILITY CRITERIA FOR THE ROUTINE BEEF MANUFACTURING TRIMMINGS (MT60) AND BENCH TRIM (MT55) SAMPLING PROGRAMS

I. PURPOSE

A. This notice cancels FSIS Notice 81-13 and clarifies what product is to be sampled as beef manufacturing trimmings (under MT60 sampling code), and what product is to be sampled as bench trim (MT55). This notice also explains that product eligible for sampling as beef manufacturing trimmings is not to be sampled as bench trim by FSIS at further processors. Therefore, this notice provides inspection program personnel (IPP) with information on how to determine what product is eligible for sampling by FSIS at the slaughter establishment, what product is eligible for sampling as bench trim at further processors, and when bench trim samples are to be collected by FSIS. Finally, this notice also incorporates the information from previously issued askFSIS questions and answers.

B. FSIS samples beef manufacturing trimmings under code MT60. FSIS samples bench trim under code MT55. This notice clarifies when inspection program personnel (IPP) are not to collect samples under MT60 and under MT55. It also instructs IPP to verify that the establishment's PHIS profile information is accurate, so that establishments are scheduled to be sampled under the appropriate sampling programs.

C. The Office of Inspector General (OIG) evaluated FSIS's sampling programs for Shiga toxin-producing *Escherichia coli* (STEC). The OIG found that FSIS did not consistently sample boxed beef products, e.g., primal and subprimal cuts (usually chucks, rounds, and sirloins), that further processors use as-is (i.e., without trimming or cutting in smaller pieces) to make raw ground beef products. FSIS agreed that primal and subprimal cuts further processors receive and use for raw ground beef products or other raw non-intact products are considered bench trim, and that such primal and subprimal cuts need to be sampled as bench trim. These products would likely not be sampled at the slaughter establishment because the slaughter establishment considers the products to be primals or subprimals, and thus intended for raw intact use, and identifies controls to ensure that the products are used as intended. FSIS is issuing this notice to provide necessary instructions to IPP at receiving further processing establishments to sample such products as bench trim if that establishment uses them to make non-intact products.

II. BACKGROUND

A. General

1. FSIS considers all raw non-intact beef and raw intact beef intended for use in raw non-intact product that is contaminated with adulterant Shiga toxin-producing *Escherichia coli* (STEC) to be adulterated under the Federal Meat Inspection Act (21 U.S.C. 601(m)(1)). Adulterant STEC include *E. coli* O157:H7 and the six non-O157 STEC: O26, O45, O103, O111, O121, and O145.

2. The product's intended use is a key factor in determining whether FSIS collects routine samples. As described in FSIS Directive 10,010.1, *Verification Activities for Escherichia coli O157:H7 in Raw Beef Products*, Ch. II, Section I.A., FSIS, under its routine sampling programs, samples products intended for use in raw non-intact products, or when the intended use is unclear. FSIS, under its routine sampling programs, does not sample product that the establishment intends for use in intact or ready-to-eat product or product that will receive a full lethality treatment at a federally inspected establishment, provided the establishment's hazard analysis and flow chart show that the product is intended for one of these controlled uses and identify establishment controls that ensure that the product will be used as intended. When establishments do not maintain clear records concerning the intended use of beef manufacturing trimmings or bench trim, FSIS considers these products' intended use to be for the production of raw non-intact products, and thus they are subject to FSIS sampling and testing for STEC.

3. FSIS samples product derived from animals slaughtered onsite under MT60. FSIS samples purchased product under MT55.

4. Establishments are eligible for both sampling programs if they use purchased product and source materials from their own slaughter operation to produce raw non-intact beef products. FSIS samples beef manufacturing trimmings and bench trim that are produced under inspection, including inspected product that is used in retail operations conducted onsite.

B. Beef Manufacturing Trimmings (MT60) Sampling Program

1. MT60 is a sampling program for beef manufacturing trimmings. As described in FSIS Directive 10,010.1, *Verification Activities for Escherichia coli O157:H7 in Raw Beef Products*, beef manufacturing trimmings are trimmings produced from cattle (including veal) slaughtered onsite. In limited cases, MT60 sampling can be done at the sister processing establishment (FSIS Directive 10,010.1).

2. Beef manufacturing trimmings can include any of the following, provided they are produced from beef slaughtered onsite:

    a. Two piece chucks (i.e., the blade portion and an arm roast from the forequarter individually packaged and placed into the same container);

    b. Raw beef source materials from subprimal cuts (e.g., steaks and roasts);

    c. Primal cuts (e.g., rounds, loins, shanks, ribs, and other primals listed in 9 CFR 316.9) the producing slaughter establishment intends for raw non-intact use; and

    d. Beef parts of boneless beef of any size in boxes or in combos the producing slaughter establishment intends for raw non-intact use.

3. IPP are not to sample primal and subprimal cuts at the producing slaughter establishment, provided the slaughter establishment identifies the product for use in raw intact or RTE product or other product that receives a full lethality treatment at a federally inspected establishment, and if the slaughter establishment has identified controls, along with supportable evidence, that ensure that the primal and subprimal cuts are used as intended.

4. The purpose of the MT60 beef manufacturing trimmings program is to assess the food safety controls the slaughter establishment has in place to address STEC in the cattle it slaughters.

MT60 test results reflect the effectiveness of the establishment's slaughter and dressing operations because the trim is from cattle slaughtered onsite.

C. Bench Trim (MT55) Sampling Program

1. Under the MT55 sampling program, IPP are to sample product that was derived from cattle that was not slaughtered on site and that was not eligible for sampling at the slaughter establishment.

2. MT55 is a sampling program for bench trim. As described in FSIS Directive 10,010.1, bench trim is derived from cattle not slaughtered onsite (i.e., purchased product).

3. Under the MT55 code, FSIS samples purchased product the establishment uses to produce bench trim, including secondary trimmings, smaller pieces of trim, and chucks, rounds, sirloins, and other primal or subprimal cuts the further processor intends for use in raw non-intact product.

4. MT55 targets raw beef source materials, such as vacuum packaged subprimals, that were not eligible for sampling under the MT60 beef manufacturing trimmings or MT54 other raw ground beef components sampling program.

NOTE: FSIS samples raw esophagus (weasand) meat, head meat, cheek meat, heart meat, beef from advanced meat recovery (AMR) systems, and low temperature rendered products (e.g., partially defatted chopped beef, partially defatted beef fatty tissue, and low temperature rendered lean finely textured beef) under the MT54 program at the slaughter establishment where the source materials originate, and the low temperature rendered products are manufactured. In addition, FSIS samples ammoniated beef products under the MT54 program at non-slaughter establishments that produce this product.

5. The purpose of the MT55 bench trim program is to verify the food safety procedures that the further processor has in place to address STEC in the products it receives and uses to produce trim or raw non-intact product.

III. CURRENT SAMPLING ELIGIBILITY CRITERIA

A. MT60 and MT55

Under the MT60 and MT55 programs, there are two situations in which IPP are to collect samples:

1. Situation 1 -- The slaughter establishment produces beef manufacturing trimmings and purchases primal or subprimal cuts from which it produces smaller pieces of bench trim, and the product leaves the slaughter establishment for further processing elsewhere. In this situation, IPP are to sample the beef manufacturing trimmings and the bench trim when the establishment intends the product for raw non-intact use, or when the intended use of the product is not clear. When the beef manufacturing trimmings are produced from cattle slaughtered onsite, IPP are to sample the trimmings under MT60. Since the bench trim is produced from purchased product, IPP are to sample the bench trim under MT55.

2. Situation 2 -- The slaughter establishment produces beef manufacturing trimmings and purchases primal or subprimal cuts from which it produces smaller pieces of bench trim, and uses the product to produce any of the raw ground beef products listed below. When beef manufacturing trimmings are used to produce these ground beef products, IPP are to sample the trimmings under MT60. When the bench trim is used to produce these products, IPP are to sample it under MT55. The following are the raw ground beef products in question:

a. Raw beef products that meet the standards of identity for chopped or ground beef (9 CFR 319.15(a));

b. Raw beef products that meet the standards of identity for hamburger (9 CFR 319.15(b));

c. Raw beef products that meet the standards of identity for beef patties (9 CFR 319.15(c));

d. Other raw beef products that do not meet the standards of identity for ground and chopped beef, hamburger, or beef patties but are produced similarly, such as raw ground beef products with added ingredients, such as beef patties with cherries, ground beef with one or more different species where beef is the predominant species (e.g., ground beef with 1% added pork), or Not Ready-to-Eat (NRTE) breaded hamburger patties;

e. Irradiated or high pressure processing (HPP) treated raw ground beef products, provided the irradiation or HPP treatment is not a full lethality treatment; and

f. Ammoniated raw ground beef products.

B. MT60

Under the existing MT60 program, when the slaughter establishment produces primal or subprimal cuts from cattle slaughtered onsite and uses these primal and subprimal cuts to produce the raw ground beef products listed in Section III.A.2., IPP are to sample the primal and subprimal cuts used to produce the ground beef products under MT60.

IV. EXPANDED SAMPLING ELIGIBILITY CRITERIA

A. MT60 and MT55

This notice clarifies that the following are two additional situations when IPP are to collect samples under MT60 and MT55:

1. Situation 3 -- The slaughter establishment uses beef manufacturing trimmings and purchases primal or subprimal cuts from which it produces smaller pieces of bench trim to produce any raw non-intact beef product other than those listed in Section III.A.2., including not ready-to-eat (NRTE) non-intact product that receives a heat treatment but is not fully cooked (e.g., char-marked heat-treated but not fully cooked beef patties, chicken-fried steak type product, or breaded beef patty that is heated-treated but not fully cooked). Examples of raw and heat-treated but not fully cooked/NRTE non-intact beef products are included below. IPP are to sample the beef manufacturing trimmings or bench trim used to produce these products but not the finished raw or heat-treated but not fully cooked/NRTE non-intact products. When the beef manufacturing trimmings are produced from cattle slaughtered onsite, IPP are to sample the beef manufacturing trimmings under MT60. When the bench trim is produced from purchased product, IPP are to sample the bench trim under MT55. The following are examples of the finished raw and heat-treated but not fully cooked/NRTE non-intact products:

    a. Shaped and formed ground beef products other than patties (e.g., meatballs, meatloaf, gyros);

    b. Ground beef meat fillings (e.g., taco meat, tamale meat);

c. Ground beef sauces or soups (e.g.,“Sloppy Joe,” chili);

d. Thinly sliced raw beef derived from reconstructed beef products used in “Philly” style cheese steaks;

e. Multi-ingredient raw ground meat or poultry products for which the establishment labels the product to show that beef is the predominant species in the product;

f. Raw beef sausages (e.g., fresh sausages, beef chorizo);

g. Diced beef (smaller than 3/4 inch);

h. Char-marked heat-treated but not fully cooked beef patties; and

i. Corned beef.

NOTE: Some of these finished products, or their beef component, may receive a full lethality treatment at a federal establishment. In that situation, IPP are not to collect MT60 and MT55 samples.

2. Situation 4 -- The slaughter establishment produces or receives primal or subprimal cuts or other source material that it uses to produce mechanically tenderized products. FSIS considers “mechanically tenderized” products to be beef products that have been needle or blade tenderized or that have been injected. In this situation, IPP are to sample the primal and subprimal cuts or other source material, before mechnically tenderizing, used to produce the mechanically tenderized products. When the primal and subprimal cuts used to produce mechanically tenderized product are from cattle slaughtered onsite, IPP are to sample the primal and subprimal cuts under MT60. When the primal and subprimal cuts or other source material used to produce mechanically tenderized products are from purchased product, IPP are to sample the primal and subprimal cuts or other source material under MT55.

B. MT55

This notice clarifies that the following are two additional situations when IPP are to collect samples under MT55:

1. Situation 5 -- IPP are to collect MT55 samples when the non-slaughter establishment produces bench trim from cattle not slaughtered on site.

2. Situation 6 -- IPP are to collect MT55 samples when the non-slaughter establishment uses, without trimming or cutting into smaller pieces, purchased primal or subprimal cuts or other source materials that were not eligible for MT60 sampling at the producing slaughter establishment. The non-slaughter establishment uses the materials to make the raw non-intact beef products listed in Section III.A.2 or Section IV.A.1. In this situation, when collecting MT55 samples, IPP are to sample the purchased primal or subprimal cuts or other source materials used to produce the non-intact products but not the finished raw or heat-treated/NRTE non-intact products.

   a. Under the MT55 program, IPP are to sample individually vacuum packaged or boxed primal and subprimal cuts a further processor receives and uses to produce smaller pieces of bench trim or raw non-intact product.

NOTE: These products are not eligible for sampling under the MT60 beef manufacturing trimmings program when the producing slaughter establishment identifies that the product’s

intended use is for raw intact product and identifies controls to ensure product is used as intended. A control can include a letter of intended use and a reference to the producing slaughter establishment's letter of intended use on bills of lading.

b. IPP are to sample, under the MT55 code, primal and subprimal cuts derived from purchased whole, half, or quarter carcasses, provided the further processor intends the primal and subprimal cuts for raw non-intact use.

NOTE: Whole, half, and quarter carcasses are not eligible for sampling under the MT60 beef manufacturing trimmings program.

3. IPP are not to sample, under the MT55 sampling program, purchased raw beef products that, when received, are accompanied by certificates of analysis (COAs) with negative *E. coli* O157:H7 (or STEC organisms or virulence markers) test results, and from which the further processor does not produce separable bench trim. Establishments only sample and test for STEC or virulence markers product intended for raw, non-intact use. Therefore, raw beef products accompanied by COAs with negative results were eligible for sampling under the MT60 beef manufacturing trimmings program at the slaughter establishment and, as a result, are not to be sampled as bench trim by FSIS at the further processor. **NOTE:** IPP are to be aware that a prudent establishment generally would conduct testing of such product sufficient to verify that their food safety system (e.g., prerequisite program) is effectively working.

4. IPP are not to sample, under the MT55 program, ammoniated beef products and other raw ground beef components (e.g., head meat, cheek meat, heart meat, weasand meat) a further processor receives and uses to produce raw non-intact product. Other raw ground beef components are sampled under the MT54 program.

5. When an establishment receives mechanically tenderized purchased product and uses this product in its entirety without producing separable bench trim to make other raw non-intact products (such as ground beef), IPP are not to sample the non-intact purchased product under the MT55 sampling program. If an establishment grinds product, IPP are to sample the ground product under the MT43 code.

C. The establishment may produce beef manufacturing trimmings and may receive bench trim. The establishment may combine beef manufacturing trimmings and bench trim to produce a ground beef product or other non-intact product. IPP are to continue to sample the beef manufacturing trimmings and bench trim separately, following the instructions in FSIS Directive 10,010.1.

V. PRODUCT NOT ELIGIBLE FOR MT60 OR MT55 SAMPLING

There are two situations in which IPP are not to collect samples under MT60 and MT55:

1. The trim is intended for use in raw or ready-to-eat (RTE) product or in other product that will receive a full lethality treatment at a federally inspected establishment (FSIS Directive 10,010.1). Examples of full lethality treatments other than cooking can include high pressure processing and irradiation, provided the establishment has supporting documentation that shows the treatment achieves a 5-log reduction for *Salmonella* and applies the treatment consistent with its critical operational parameters.

2. The trim is produced from cattle slaughtered under a custom exemption (9 CFR 303.1(a)(2)) or trim is produced under the retail exemption (9 CFR 303.1(d)(2)(i)(a)); such product cannot be further processed within an official establishment.

VI. IPP RESPONSIBILITIES FOR THE PHIS ESTABLISHMENT PROFILE

A. Attachment 1 includes information to assist IPP in understanding the MT60 and MT55 sampling programs. Attachment 1 includes a decision tree for determining whether establishments are eligible for sampling under MT60, MT55, or both sampling programs.

B. Attachment 2 provides detailed information on how finished products are to appear in the PHIS profile so that establishments are recognized as subject to MT60 or MT55 sampling tasks, as appropriate. Attachment 2 provides information describing how to delete finished products (Figure 1) and add products (Figures 2A-2F). Attachment 2 includes screenshots for each of the finished products listed in Section VI.A and B (Figures 3-19) so that establishments are subject to MT60 or MT55 sampling tasks, as appropriate. Attachment 2 also includes screenshots for indicating products are intended for RTE (Figure 20) so that establishments are not subject to MT60 and MT55 sampling tasks.

C. Establishments will be subject to MT60 sampling tasks in PHIS if they meet one of the following criteria:

1. The establishment slaughtered beef or veal recently, and the PHIS profile includes one or more of the following products listed as finished products. For clarification, in-house source materials mean product derived from cattle slaughtered onsite:

    a. Beef Manufacturing Trimmings (see Attachment 2, Figure 3);

    b. Beef Trimmings from non-intact beef (see Attachment 2, Figure 4);

    c. Ground Beef Product from in-house source materials (see Attachment 2, Figure 5);

    d. Hamburger/Beef Patty Product (see Attachment 2, Figure 6);

    e. Ground Beef combined with other species from in-house source materials (see Attachment 2, Figure 7);

    f. Hamburger/Beef Patty combined with other species from in-house source materials (see Attachment 2, Figure 8);

    g. Other non-intact product (fresh sausage, meat loaf, gyros, meat balls) (see Attachment 2, Figure 9); or

    h. Mechanically tenderized products from in-house source materials (see Attachment 2, Figure 10).

2. Establishments at which an MT60 sample has been collected recently, including when sampling is directed by the Office of Policy and Program Development to address “sister” establishment arrangements for grinding.

D. Establishments will be subject to MT55 sampling tasks in PHIS if they meet one of the following criteria:

1. PHIS profile includes one or more of the following products listed as finished products. For clarification, purchased source materials mean product not from cattle slaughtered onsite:

    a. Bench Trim (trimmings from animals not slaughtered at the est) (see Attachment 2, Figure 11);

    b. Bench Trim (derived from non-intact beef not slaughtered at the est) (see Attachment 2, Figure 12);

    c. Beef Trimming from non-intact beef (see Attachment 2, Figure 13);

    d. Ground Beef Product from purchased source materials (see Attachment 2, Figure 14);

    e. Ground Beef combined with other species from purchased source materials (see Attachment 2, Figure 15);

    f. Hamburger/Beef Patty combined with other species from purchased source materials (see Attachment 2, Figure 16);

    g. Hamburger/Beef Patty Product (see Attachment 2, Figure 17);

    h. Other non-intact product (fresh sausage, meat loaf, gyros, meat balls, etc) (see Attachment 2, Figure 18); or

    i. Mechanically tenderized products from purchased source materials (see Attachment 2, Figure 19).

2. Establishments at which a MT55 sample has been collected recently.

E. Establishments will not be subject to MT55 or MT60 sampling tasks in PHIS if all of the eligible finished product groups selected in the PHIS profile are “intended for RTE only.”

F. After reading this notice and during performance of the next scheduled PHIS profile update task, IPP are to gather the necessary information to update the PHIS profile. They are to use the information in this notice, including Attachments 1 and 2 and the information gathered to update the PHIS profile. If IPP have questions, they are to consult with their immediate supervisor or contact askFSIS for assistance.

NOTE: In some instances, IPP may need to take multiple days to gather and assess the necessary information to determine whether they need to make changes to the PHIS profile.

1. IPP assigned to establishments subject to sampling are to verify that the profile includes finished products that would make the establishment subject to the appropriate sampling program.

2. IPP are to enter each product and select “Other” for the intended use and leave the text box blank except when the product is intended for RTE only at a federally inspected establishment. In that situation, IPP are to enter the product and select “for RTE cooking only” and the volume associated with this intended use (Figure 20). IPP are then to enter any other products produced and select “Other” as the intended use and the volume associated with this intended use.

NOTE: IPP are not to enter multiple intended uses during a single entry of a product group.

3. IPP are to delete duplicate entries for product groups that have the same intended use identified.

4. For slaughter establishments that do not produce trim or raw non-intact product from cattle slaughtered onsite but do produce trim or raw non-intact products from purchased product, IPP assigned there are to:

    a. Review the PHIS profile criteria FSIS uses to assign MT55 sampling tasks and update the profile to ensure the establishment is subject to MT55 sampling;

    b. Review the PHIS profile criteria uses to assign MT60 sampling tasks and update the profile to ensure the establishment is not subject to MT60 sampling; and

    c. Contact askFSIS for assistance if IPP continue to receive MT60 sampling tasks 45 days after making the necessary changes to the profile.

VII. SAMPLE COLLECTION

A. IPP are to use the N60 method to collect samples and follow the sampling instructions in FSIS Notice 69-13, *Containers for Use When Collecting Raw Beef Samples for Shiga toxin-producing Escherichia coli (STEC) and Salmonella Testing*, and FSIS Directive 10,010.1, *Verification Activities for Escherichia coli O157:H7 in Raw Beef Products*.

1. When collecting trim samples, IPP are to randomly select a day, shift, and time within the sample collection window indicated in the PHIS sample task request. IPP are to collect samples from all shifts the establishment operates. There is to be an equal chance that sampling will occur during any particular shift (FSIS Directive 10,010.1, Chapter II, Section I, A. 6). The alternative parameters for sampling a lot at the start of production (FSIS Directive 10,010.1, Chapter II, Section III. B) apply to ground product, not beef manufacturing trim or bench trim.

2. As described in FSIS Directive 10,010.1, Chapter II, Section I, A. 8, IPP are to collect the sample after the establishment has applied all antimicrobial treatments.

NOTE: The establishment's application of an antimicrobial treatment (other than a treatment that achieves a full-lethality) does not exempt the establishment from sampling.

3. As described in FSIS Directive 10,010.1, Ch. II, Section V. C., IPP assigned to establishments that produce bench trim of sufficient size to be sampled using the N60 method, as well as bench trim that is too small to sample using the N60 method, are to collect samples from the product that lends itself to N60 procedures.

B. IPP are to state in the PHIS sample questionnaire, when applicable, that the sample is from primal or subprimal cuts that are used to produce mechanically tenderized product.

C. If IPP cannot safely collect the samples before tenderization (e.g., the establishment applies an antimicrobial treatment to the source materials and then tenderizes the product in a closed tunnel or cabinet-type system), IPP are to ask the establishment whether it has the capability and will agree to temporarily shut off the tenderizing component so that IPP can safely collect the sample after the antimicrobial treatment and before tenderization. If the establishment has this capability and agrees to do so, IPP are to collect the sample as the product exits the tunnel or cabinet after receiving the antimicrobial treatment. Once IPP collect the sample using the N60 procedures, the establishment could then run the remainder of the treated product through the tenderizer.

D. If the establishment does not have the capability to temporarily shut off the tenderizing component, or does not agree to do so, IPP are to collect the sample from the mechanically tenderized product using the N60 procedures. FSIS recognizes that the N60 procedures do not obtain tissue below the exposed outer surface of the product. However, if contamination is present, the likelihood of detecting contamination on the outer surface of a mechanically tenderized product is greater than that of finding contamination in the interior of a mechanically tenderized product.

E. IPP are to follow the instructions provided in FSIS Directive 13,000.2, Rev. 1, *Performing Sampling Tasks in Official Establishments using the Public Health Information System*, to cancel the sampling task when the trim is intended for use in RTE product only or to receive another full lethality treatment, when the trim is processed under a retail exemption, or when the trim is produced from cattle slaughtered under a custom exemption. IPP are to indicate, "Requested sample/product never slaughtered/produced" as the reason for canceling the task. IPP are to note that canceling a task and providing this justification does not ensure that IPP will not receive additional sampling tasks. If IPP receive a sampling task, and the establishment is not eligible for sampling, they are to review the establishment profile to make sure it is accurate so that they will not receive additional sampling tasks.

VIII. TEST RESULTS AND ENFORCEMENT ACTIONS

A. IPP are to follow the instructions set out in FSIS Directive 10,010.1 regarding responding to positive FSIS results.

B. In the event of a positive FSIS test result for beef manufacturing trimmings that the producing slaughter establishment intended for use in raw non-intact product, the product is adulterated. IPP are to conduct follow-up sampling (FSIS Directive 10,010.1, Ch. III, Section VI) and a directed HACCP verification task for the specific production lot that tested positive (FSIS Directive 10,010.1, Ch. III, Section III). IPP are also to conduct a directed Sanitation SOP task of reviewing the records for the day or days that the product was produced (FSIS Directive 10,010.1, Ch. III, Section III). IPP are also to conduct a directed Beef Sanitary Dressing task at the slaughter establishment (FSIS Directive 10,010.1, Ch. III, Section VII).

C. In the event of a positive FSIS test result in bench trim that the further processor intended for use in raw non-intact product, the product is adulterated. In this situation, FSIS will typically not request the recall of source materials from suppliers of the bench trim that FSIS sampled and found positive. A recall is not warranted because the materials sampled as bench trim were not lotted like beef manufacturing trimmings at the slaughter establishment. In addition, each individual bench trim component is independent of another unless components are commingled at the further processing establishment. However, IPP are to conduct follow-up sampling at the establishment that produced the bench trim or at supplier establishments (FSIS Directive 10,010.1, Ch. III, Sections VI and VIII). IPP are also to conduct a directed HACCP verification task for the specific production lot that tested positive. IPP are to conduct these directed HACCP verification tasks at the establishment where FSIS sampled the bench trim and at supplier establishments (FSIS Directive 10,010.1, Ch. III, Sections II and III). IPP are also to conduct a directed Sanitation SOP task of reviewing the records from the day or days that the establishment produced the production lot of bench trim that tested positive (FSIS Directive 10,010.1, Ch. III, Section III). IPP are to conduct a directed Beef Sanitary Dressing task at supplier establishments (FSIS Directive 10,010.1, Ch. III, Section VII).

D. In the event of a positive FSIS test result in primal or subprimal cuts that are sampled as bench trim at a further processor but that were not intended for raw non-intact use by the originating slaughter establishment, IPP are to follow the instructions in FSIS Directive 10,010.1, Ch. III, Section XI, to collect follow-up samples at the originating slaughter establishment. As explained in FSIS Directive 10,010.1, in this situation, IPP at the originating slaughter are to verify that the establishment's HACCP plan and the specifications from the purchasing establishment show that the

product was not intended for raw non-intact use. Additionally, the IPP are to verify that the originating slaughter establishment's records show that it informed the further processors that product was not intended for raw non-intact use. Further, IPP at the originating slaughter establishment are to verify that the establishment derived the intact product from the carcass in a manner to minimize commingling with other product and packaged the product separately from other product without commingling. If these conditions are met, IPP are to collect the samples at the originating slaughter establishment from the carcass hanging in the cooler before fabrication. IPP are not to wait until the establishment breaks the carcass down into primal and subprimal cuts to collect follow-up samples. IPP are to use the N60 method to collect slices from the carcass surface from the same part of the carcass represented by the primal and subprimal cuts that tested positive at the further processor as described in FSIS Directive 10,010.1, Ch. III, Section XI.

IX. SUPERVISORY PERSONNEL RESPONSIBILITIES

A. "Supervisory personnel" refers to any Office of Field Operations (OFO) personnel who supervise IPP conducting off-line verification activities in raw beef (including veal) establishments.

B. Supervisory personnel are to review the PHIS establishment profiles. Supervisory personnel are to ensure that IPP have accurately entered PHIS profile information as described in Section VI, so that establishments are recognized in PHIS as eligible for MT60 and MT55 sampling, as appropriate.

X. QUESTIONS

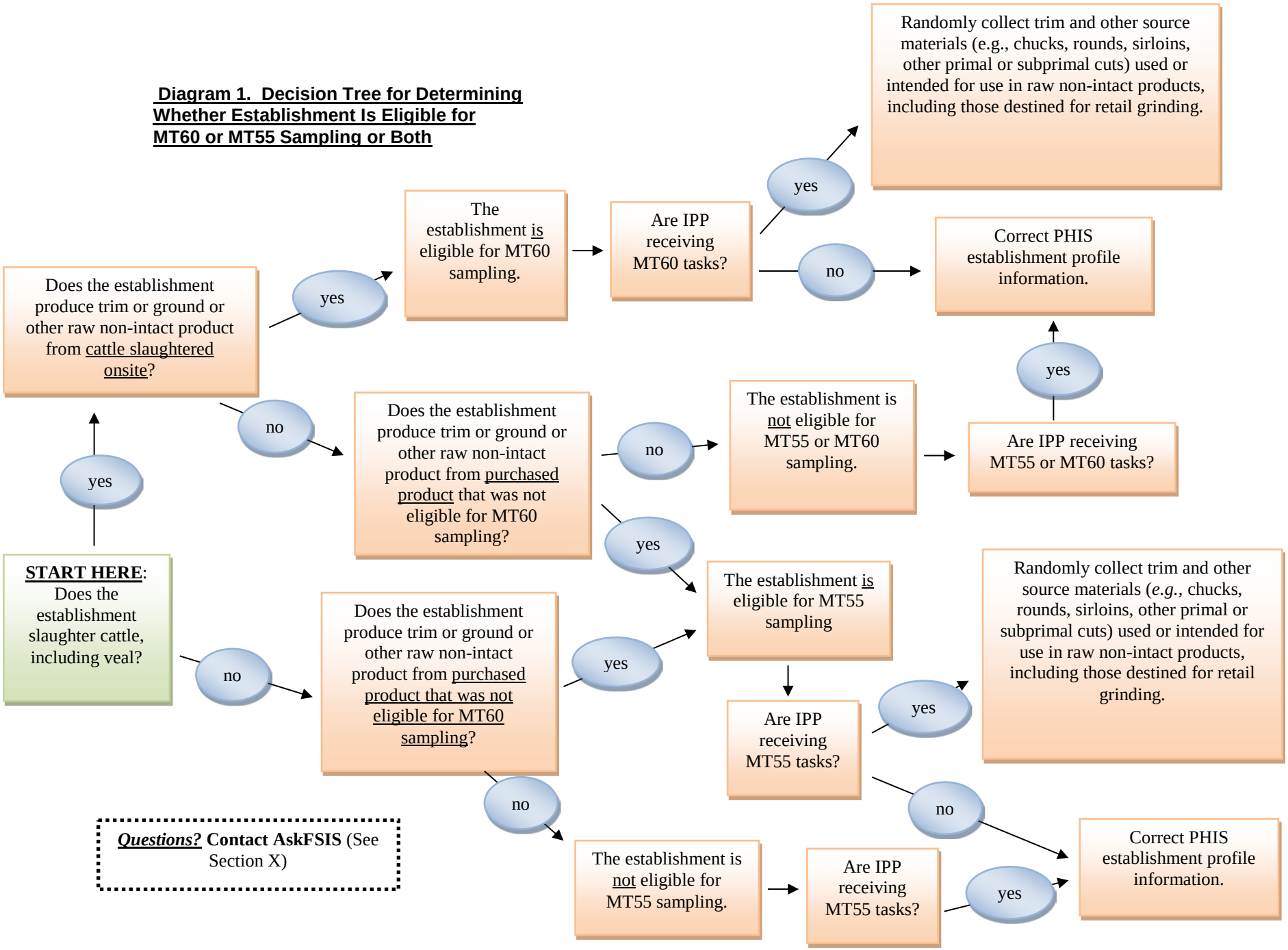
Refer questions regarding this notice to the Risk, Innovations, and Management Staff through askFSIS or by telephone at 1-800-233-3935. When submitting a question, use the Submit a Question tab, and enter the following information in the fields provided:

Subject Field: Enter **Notice 39-14**
Question Field: Enter question with as much detail as possible.
Product Field: Select **General Inspection Policy** from the drop-down menu.
Category Field: Select **Sampling *E. coli* O157:H7** from the drop-down menu.
Policy Arena: Select **Domestic (U.S.) Only** from the drop-down menu.

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

Assistant Administrator
Office of Policy and Program Development

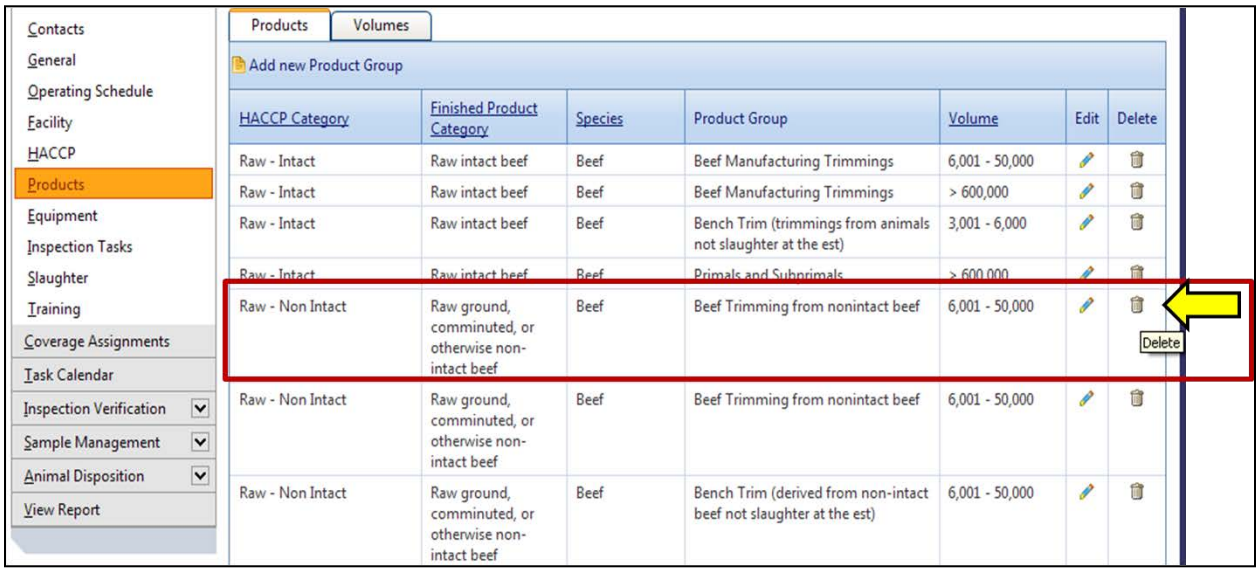
Diagram 1. Decision Tree for Determining Whether Establishment Is Eligible for MT60 or MT55 Sampling or Both



Updating the PHIS Establishment Profile to Ensure Establishments are Eligible for MT60 and MT55 Sampling, as Appropriate

This attachment describes how to delete finished products (Figure 1) and add products (Figures 2A-2F). Also shown are screenshots of how the establishment profile is to appear in PHIS for each finished product listed in Section VI (Figures 3-19) to ensure that establishments are recognized by PHIS as eligible for MT60 and MT55 sampling, as appropriate.

Figure 1. How to Delete a Product in the Establishment Profile Products page. Select the trash can icon (yellow arrow) to delete the product.



Figures 2A-2F. How to Add a New Product Group in the Establishment Profile Products page. Follow the steps diagrammed in Figures 2A through 2F to add a new product group to the establishment profile. <u>After completing each screen, be sure to click the "Save" button at the bottom of the screen.</u>

Figure 2A. On the Products tab, select "Add a new Product Group" (yellow arrow).

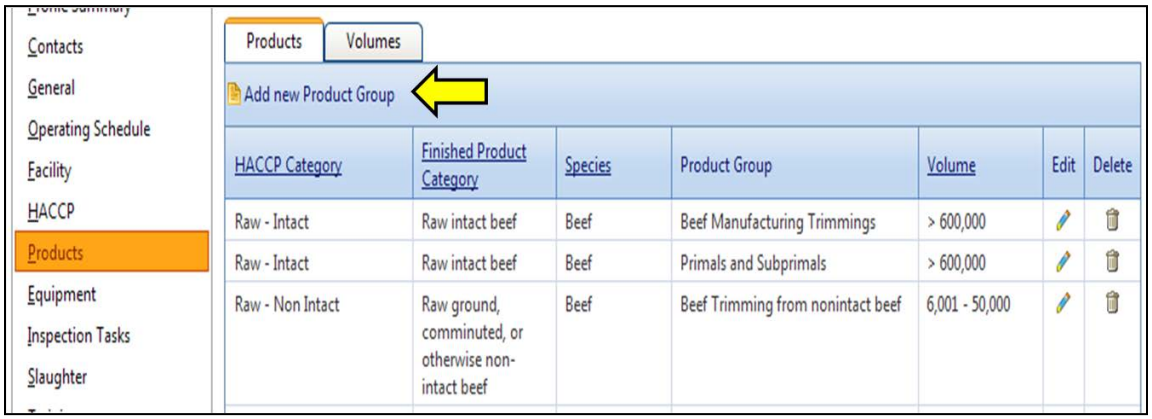


Figure 2B. On the "Raw" tab (yellow arrow), enter the HACCP Category and HACCP Plan. For Finished Product Category, enter "Raw intact beef" (red box).

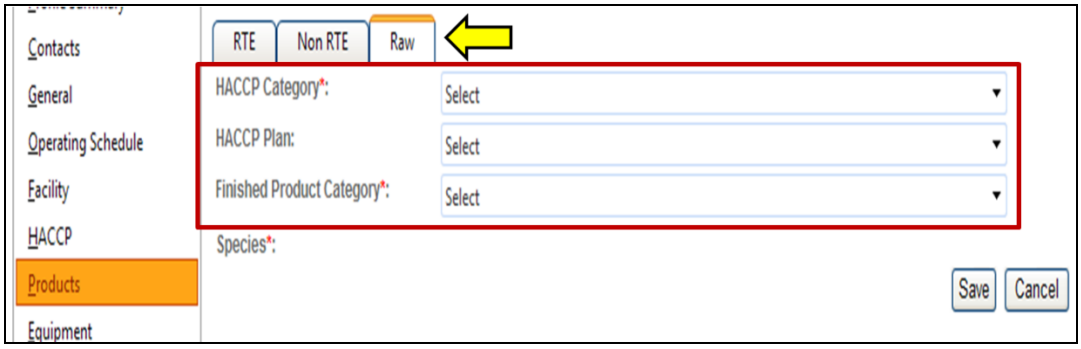


Figure 2C. After completing steps in Figure 2B, select the appropriate Product Group. In this example, select "Beef Manufacturing Trimmings" (yellow arrow).

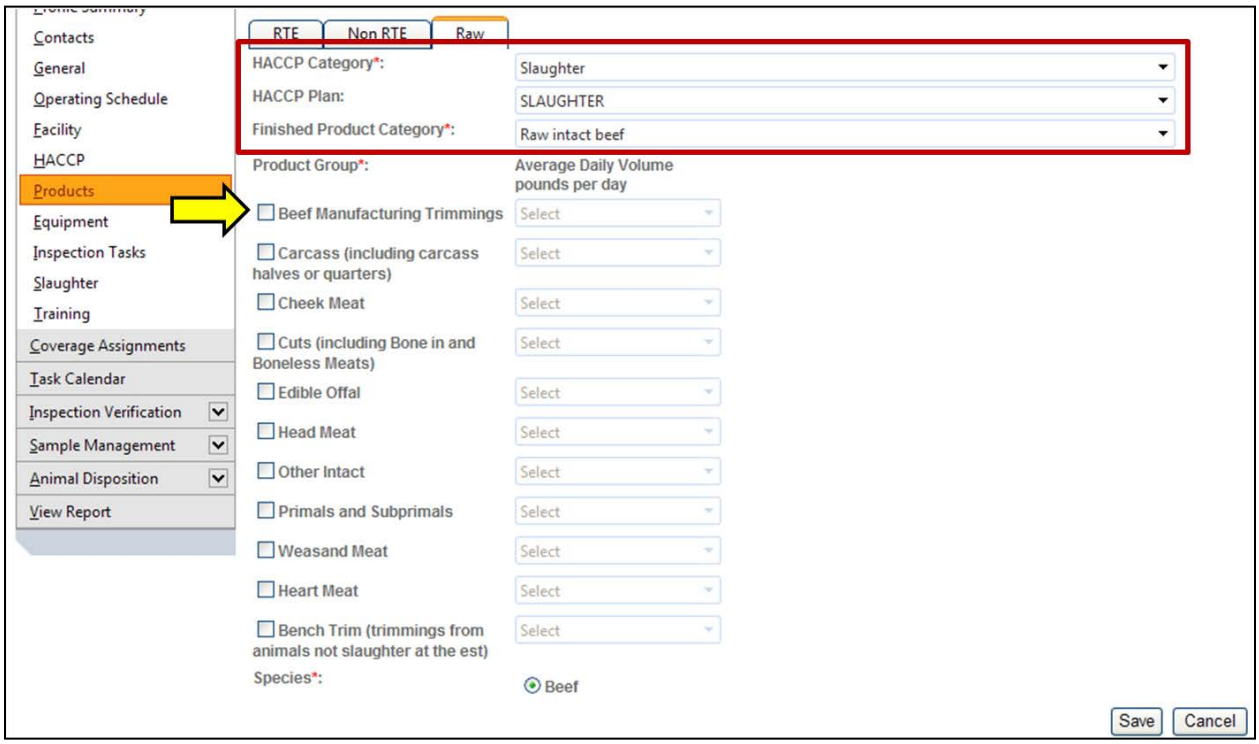


Figure 2D. For each Product Group selected, enter the Average Daily Volume (pounds per day) (red box). For intended use, select "Other" (yellow arrow).

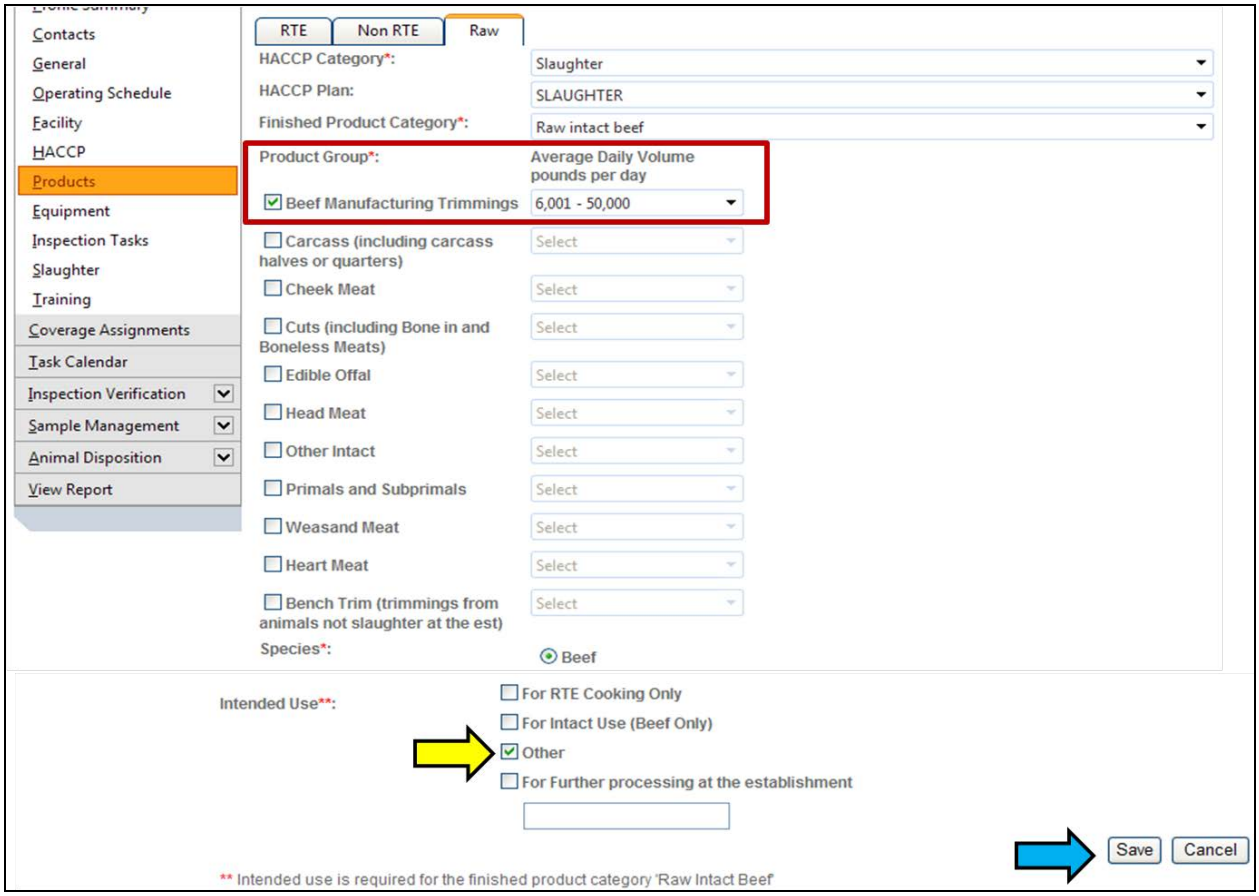
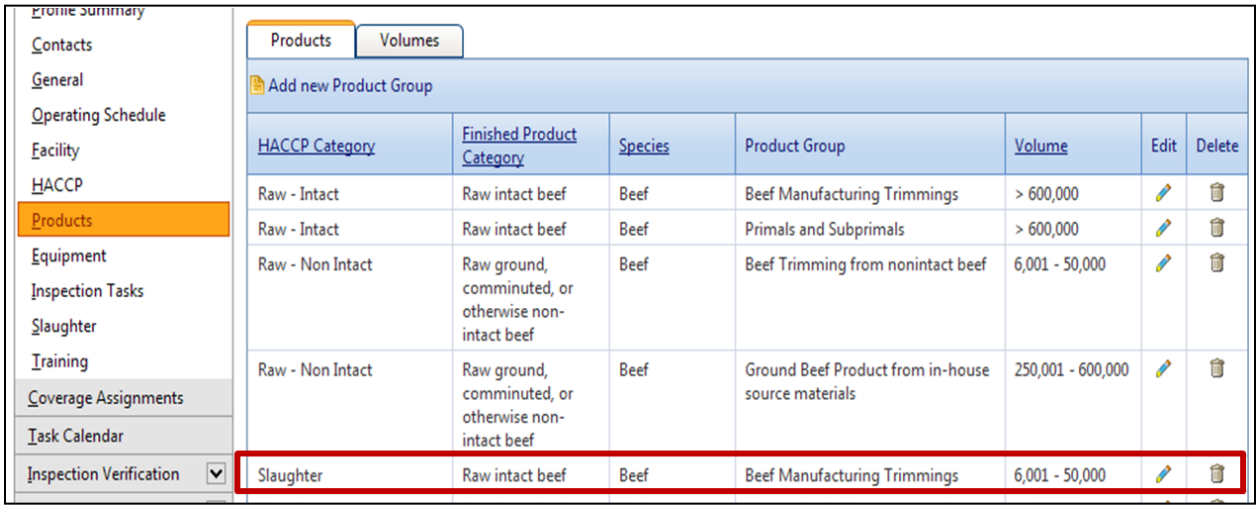


Figure 2E. In this example, the product group Beef Manufacturing Trimmings (red box) was added to the establishment profile.



HACCP Category	Finished Product Category	Species	Product Group	Volume	Edit	Delete
Raw - Intact	Raw intact beef	Beef	Beef Manufacturing Trimmings	> 600,000		
Raw - Intact	Raw intact beef	Beef	Primals and Subprimals	> 600,000		
Raw - Non Intact	Raw ground, comminuted, or otherwise non-intact beef	Beef	Beef Trimming from nonintact beef	6,001 - 50,000		
Raw - Non Intact	Raw ground, comminuted, or otherwise non-intact beef	Beef	Ground Beef Product from in-house source materials	250,001 - 600,000		
Slaughter	Raw intact beef	Beef	Beef Manufacturing Trimmings	6,001 - 50,000		

Figure 2F. Select the "Volumes" tab and verify that the HACCP Volumes are correct. If not, revise the volumes.

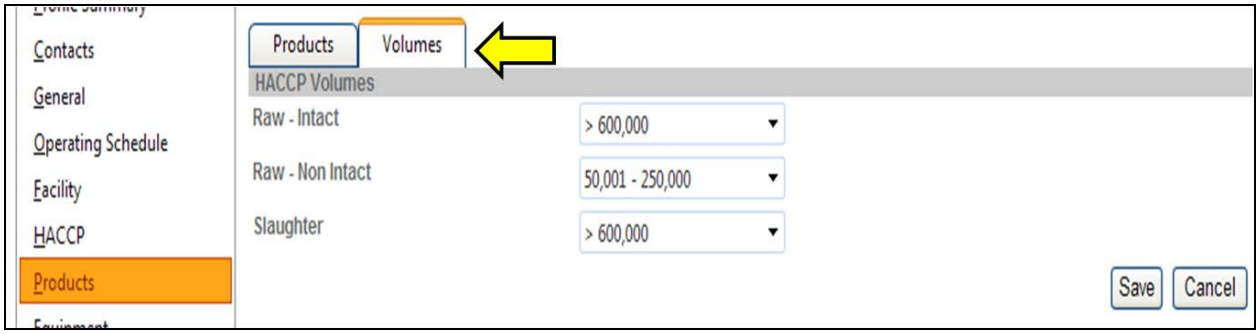


Figure 3. Beef Manufacturing Trimmings (MT60). On the "Raw" tab, for HACCP Category, select "Slaughter" or "Raw Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw intact beef." For Product Group, select "Beef Manufacturing Trimmings," and enter the average daily volume. For Intended Use, select "Other."

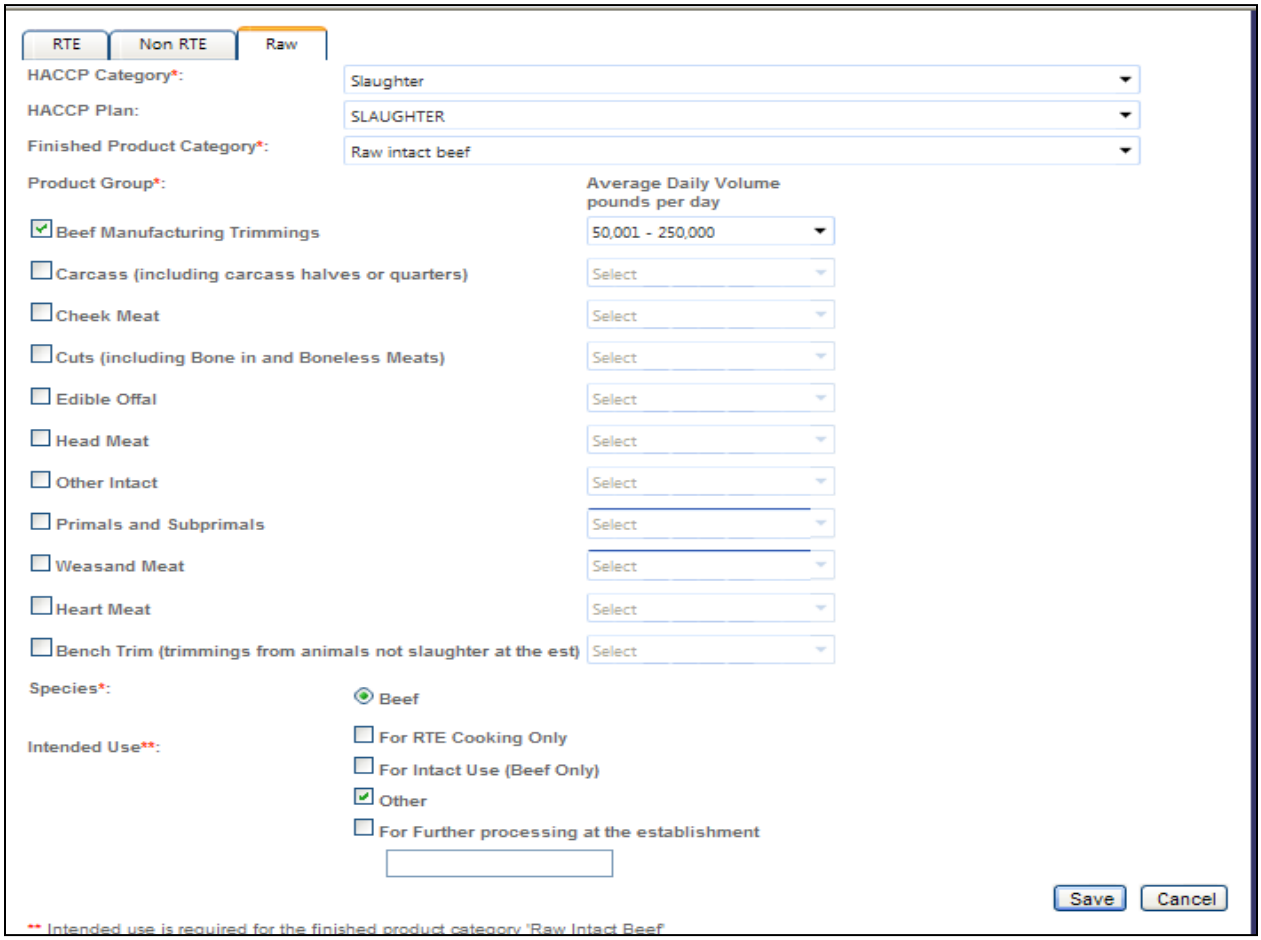


Figure 4. Beef Trimming from Non-Intact Beef (MT60). On the "Raw" tab, for HACCP Category, select "Raw - Non Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Beef Trimming from nonintact beef" and enter the average daily volume. For Intended Use, select "Other."

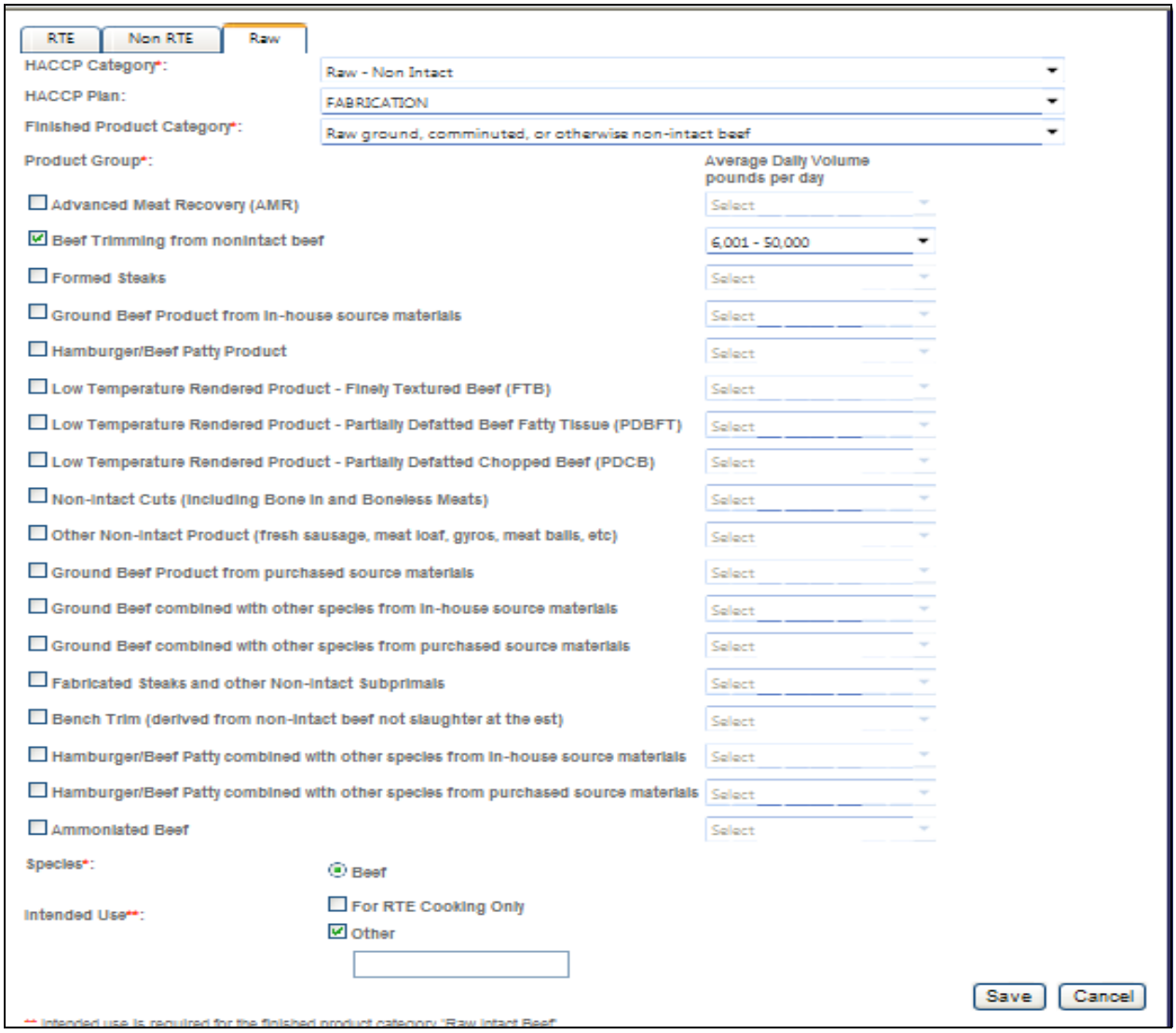


Figure 5. Ground Beef Product from In-House Source Materials (MT60). On the "Raw" tab, for HACCP Category, select the "Raw - Non Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Ground Beef Product from in-house source materials" and enter the average daily volume. For Intended Use, select "Other."

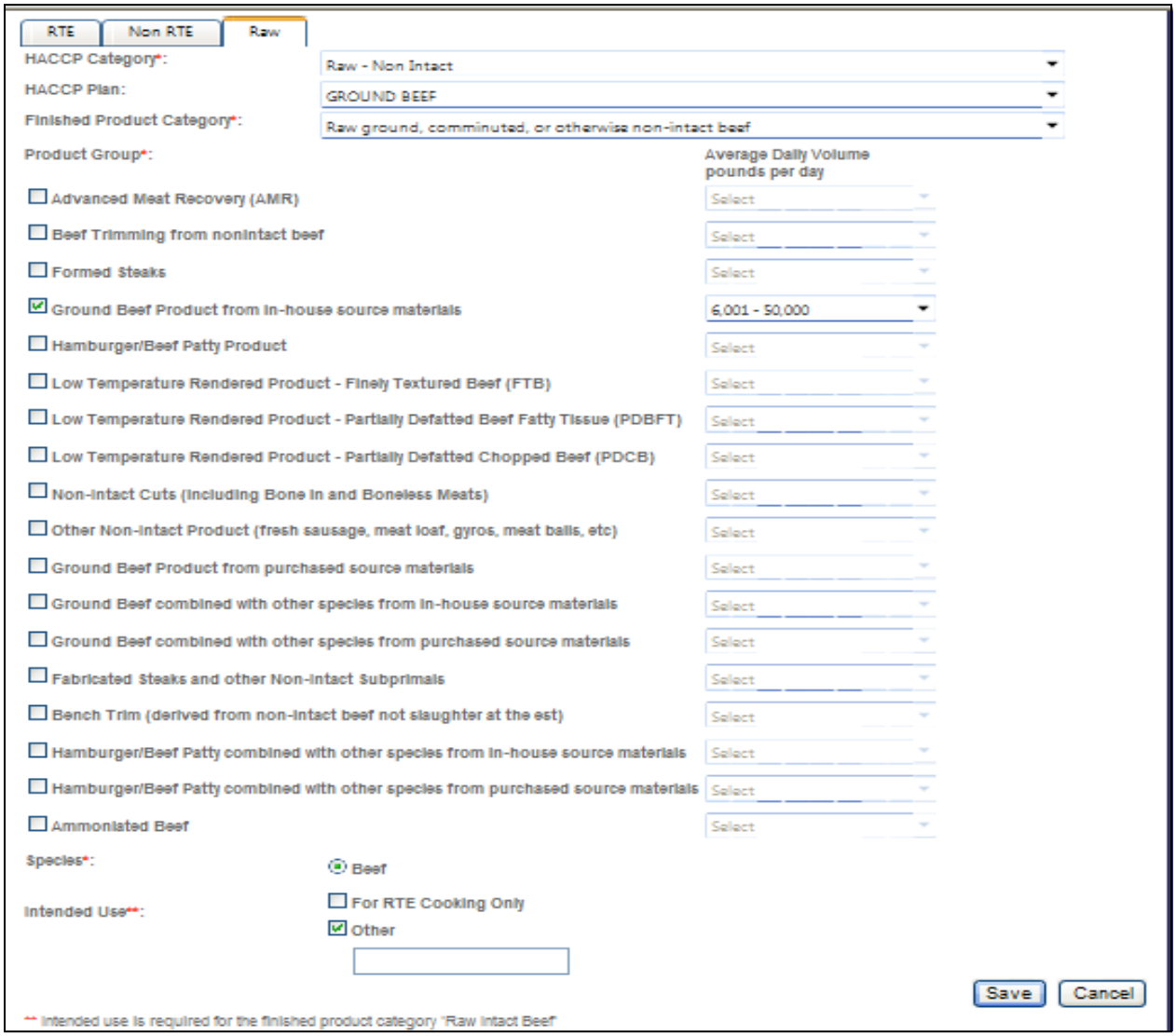


Figure 6. Hamburger/Beef Patty Product (MT60). On the "Raw" tab, for HACCP Category, select the "Raw – Non Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Hamburger/Beef Patty Product" and enter the average daily volume. For Intended Use, select "Other."

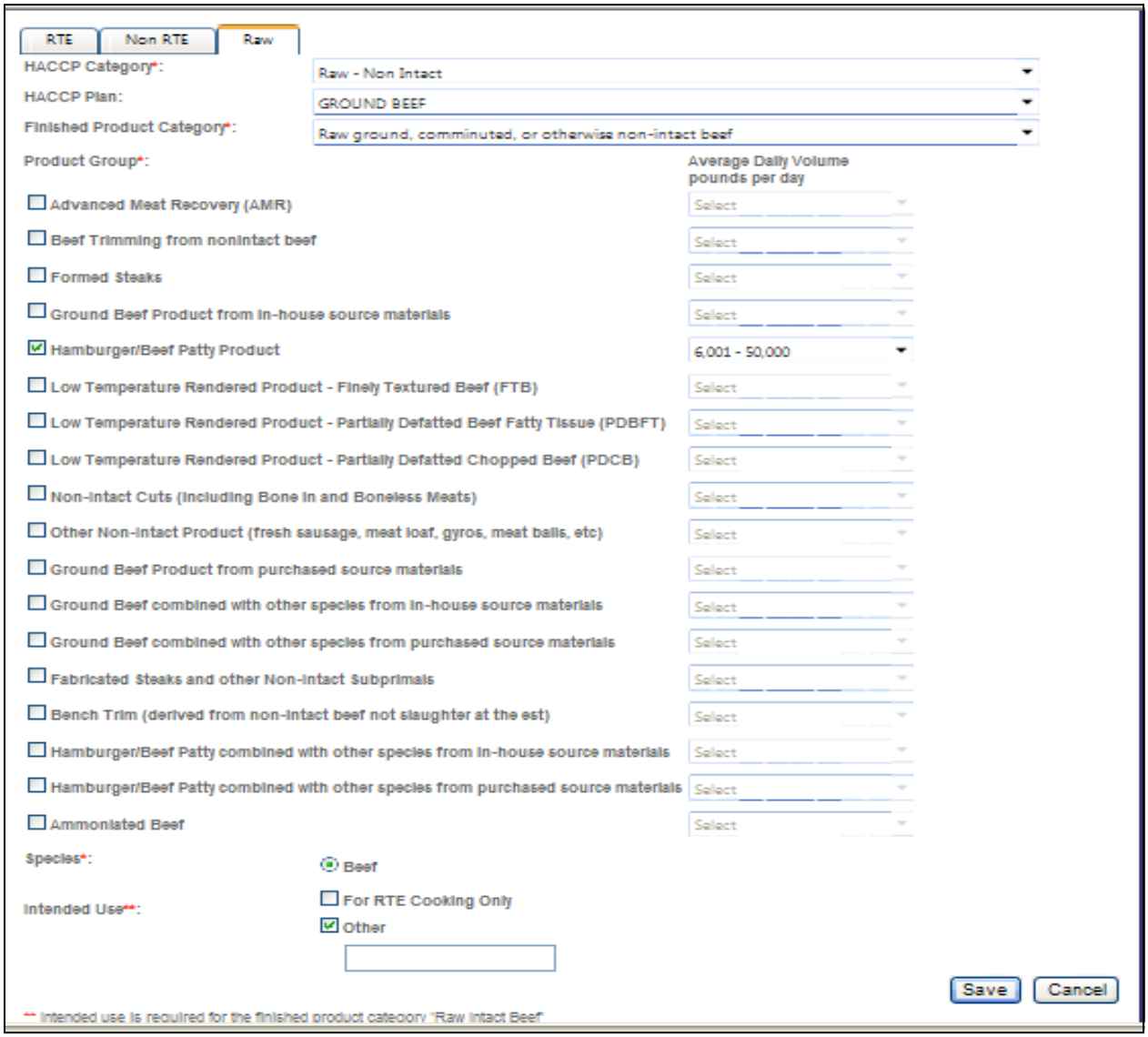


Figure 7. Ground Beef Combined with Other Species from In-House Source Materials (MT60). On the "Raw" tab, for HACCP Category, select "Raw - Non Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Ground Beef combined with other species from in-house source materials" and enter the average daily volume. For Intended Use, select "Other."

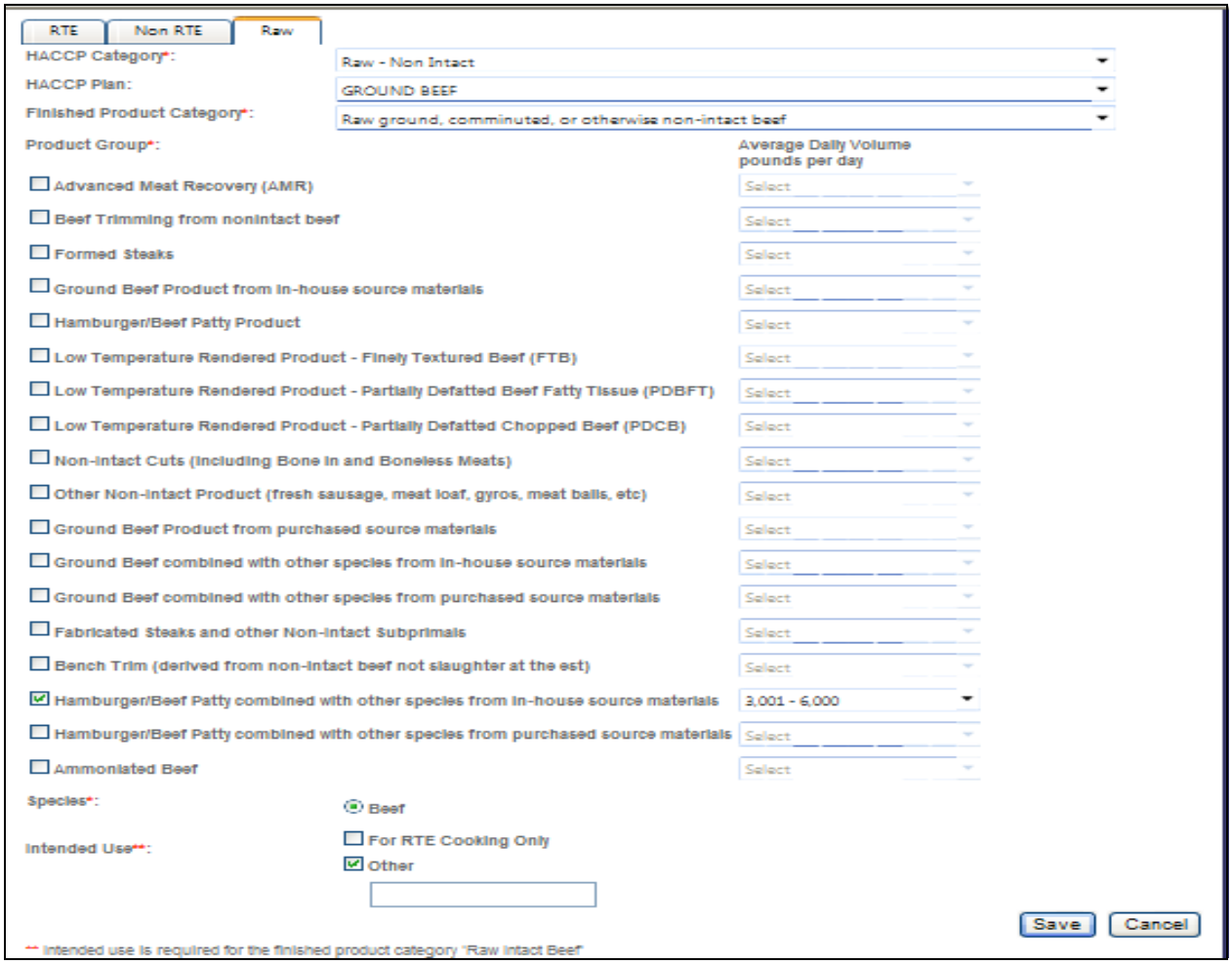


Figure 8. Hamburger/Beef Patty Combined with Other Species from In-House Source Materials (MT60). On the Raw tab, for HACCP Category, select “Raw-Non-Intact” and enter the name of the establishment’s HACCP plan. For Finished Product Category, enter “Raw ground, comminuted, or otherwise non-intact beef.” For Product Group, enter “Hamburger/Beef Patty combined with other species from in-house source materials” and enter the average daily volume. For Intended Use, select “Other.”

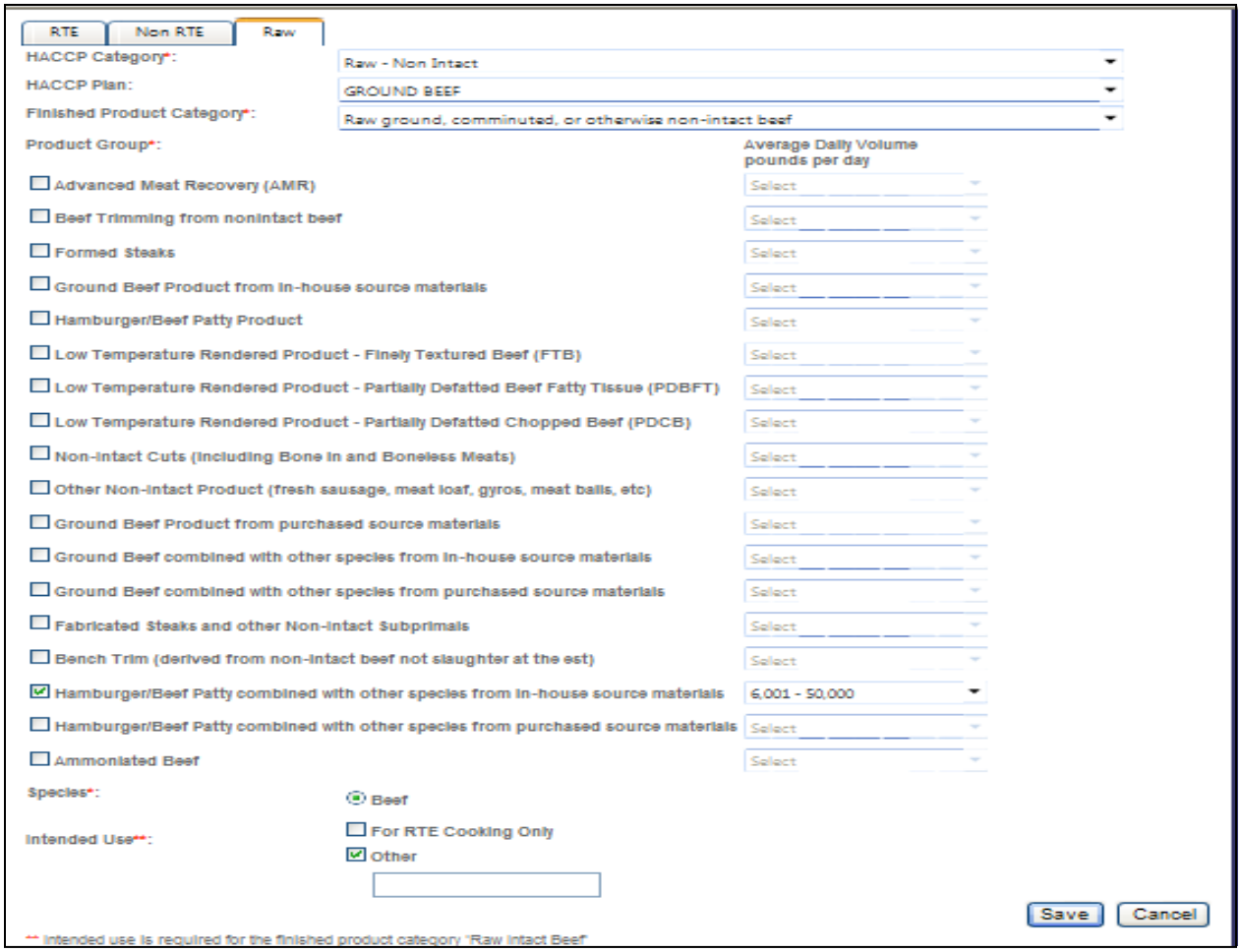


Figure 9. Other Non-Intact Product (fresh sausage, meat loaf, gyros, meat balls, etc.) (MT60). On the "Raw" tab, for HACCP Category, select "Raw - Non Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." Select the Product Group "Other Non-Intact Product (fresh sausage, meat loaf, gyros, meat balls, etc)" and enter the average daily volume. For Intended Use, select "Other."

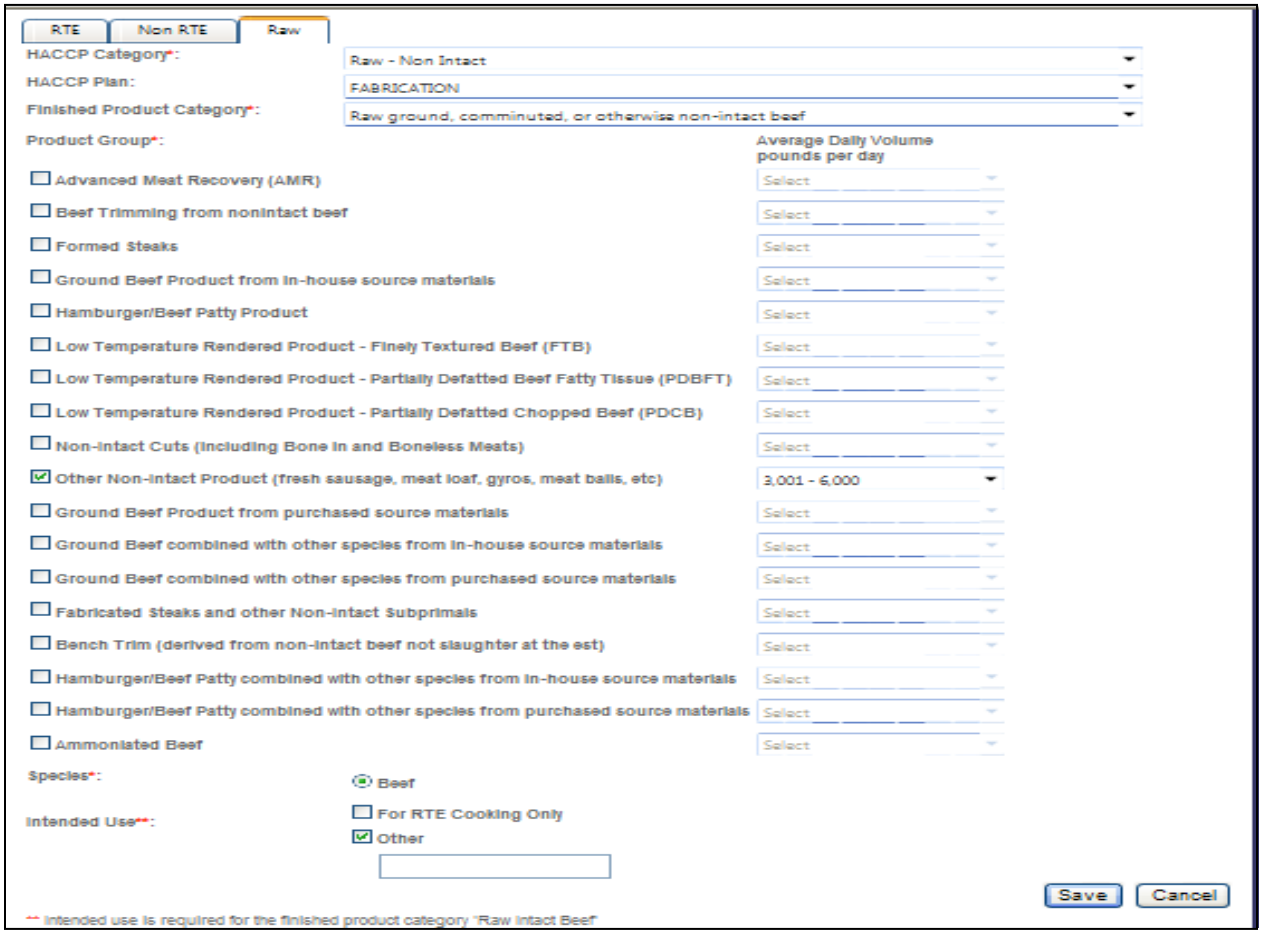


Figure 10. Mechanically tenderized products from in-house source materials (MT60). On the "Raw" tab, for HACCP Category, select "Raw - Non Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Mechanically tenderized products from in-house source materials" and enter the average daily volume." For Intended Use, select "Other."

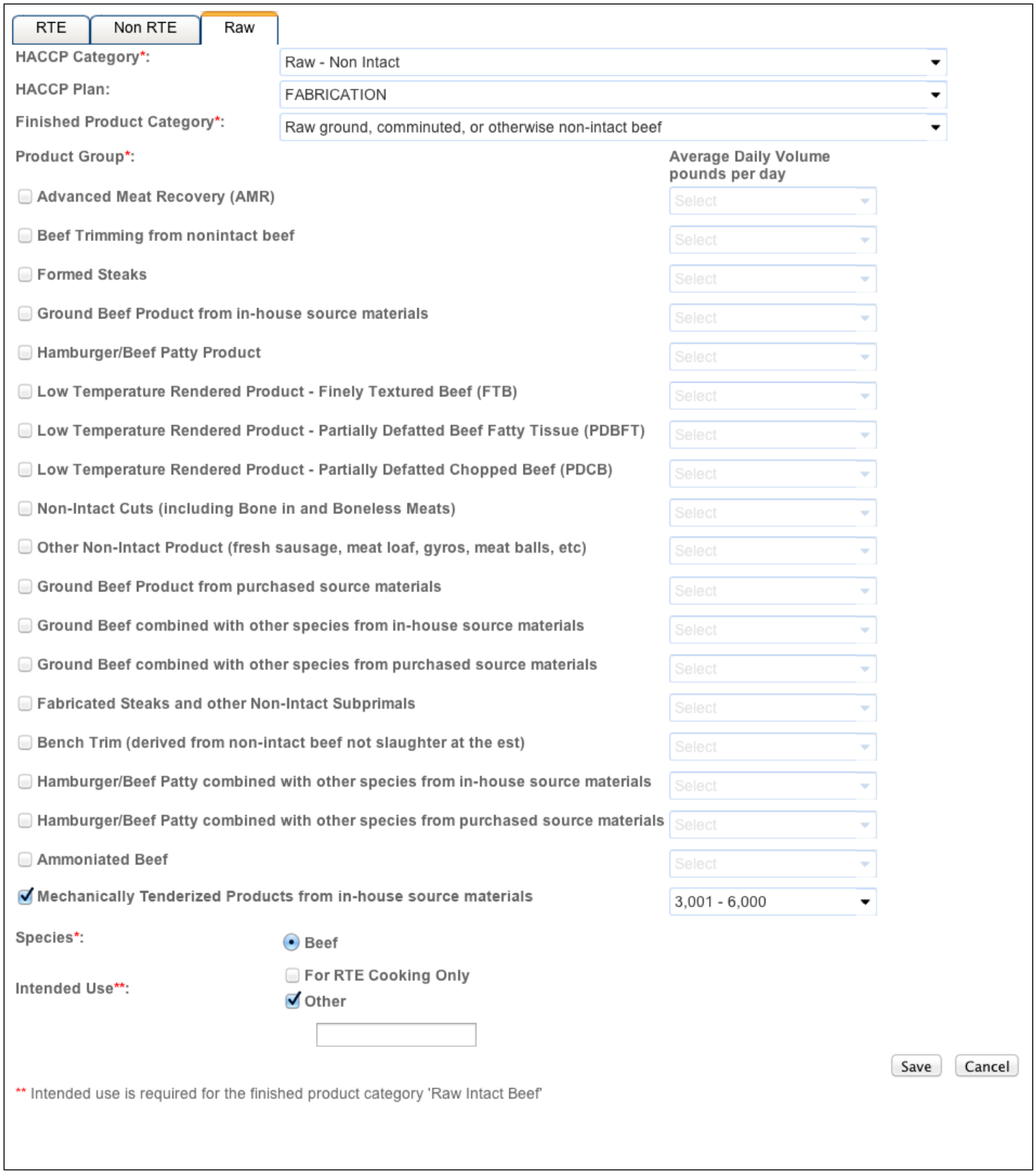


Figure 11. Bench Trim (Trimmings from Animals Not Slaughtered at the Establishment) (MT55). On the "Raw" tab, for HACCP Category, select "Raw - Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category "Raw intact beef," select Product Group "Bench Trim (trimmings from animals not slaughter at est)" and enter the average daily volume. For Intended Use, select "Other."

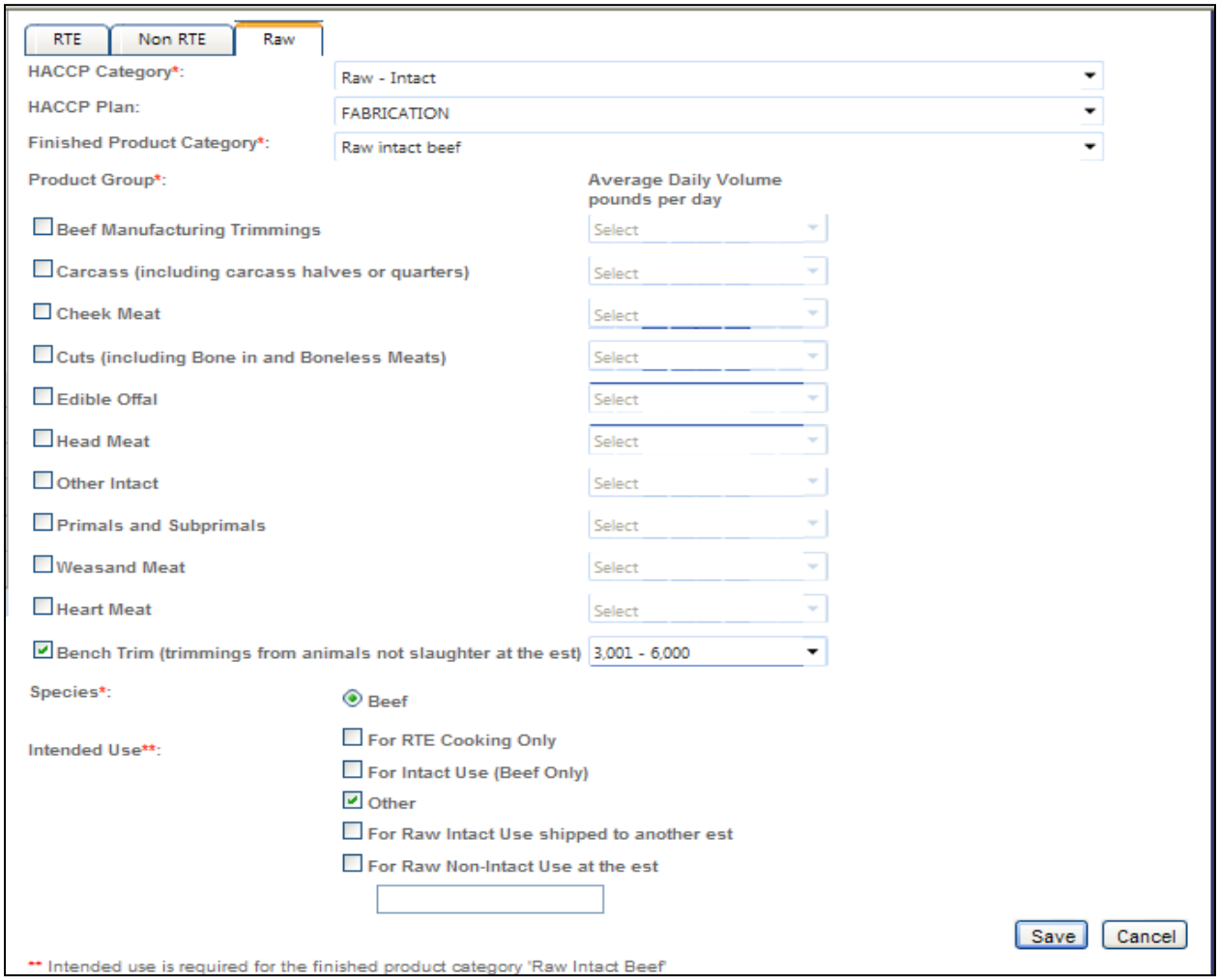


Figure 12. Bench Trim (Derived from Non-Intact Beef Not Slaughtered at the Establishment) (MT55). On the "Raw" tab, for HACCP Category, select "Raw Non-Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Bench Trim (derived from non-intact beef not slaughter at the est)" and enter the average daily volume. For Intended Use, select "Other."

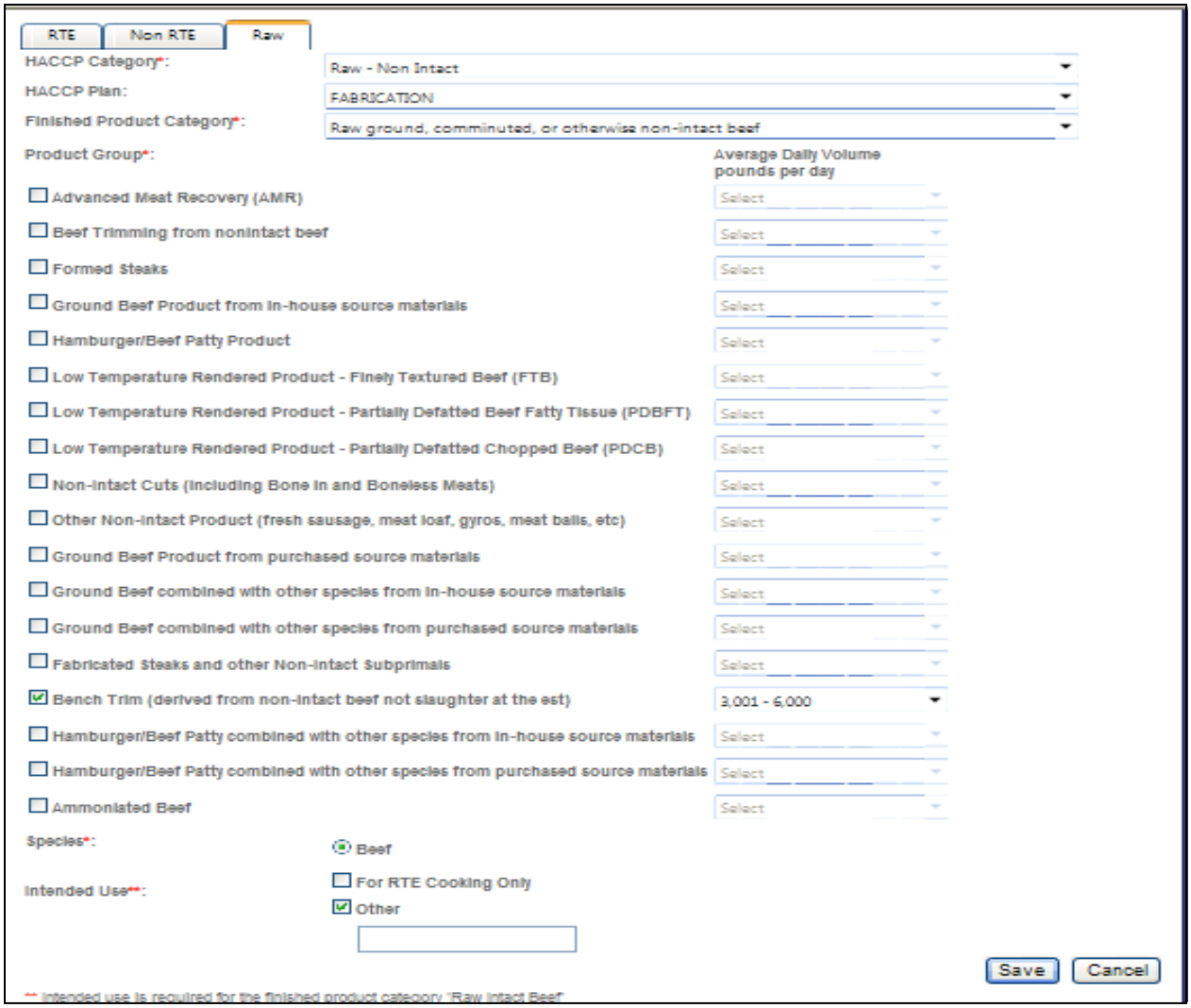


Figure 13. Beef Trimming from non-intact beef (MT55). On the "Raw" tab, for HACCP Category, select "Raw Non-Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Beef Trimming from non-intact beef" and enter the average daily volume. For Intended Use, select "Other."

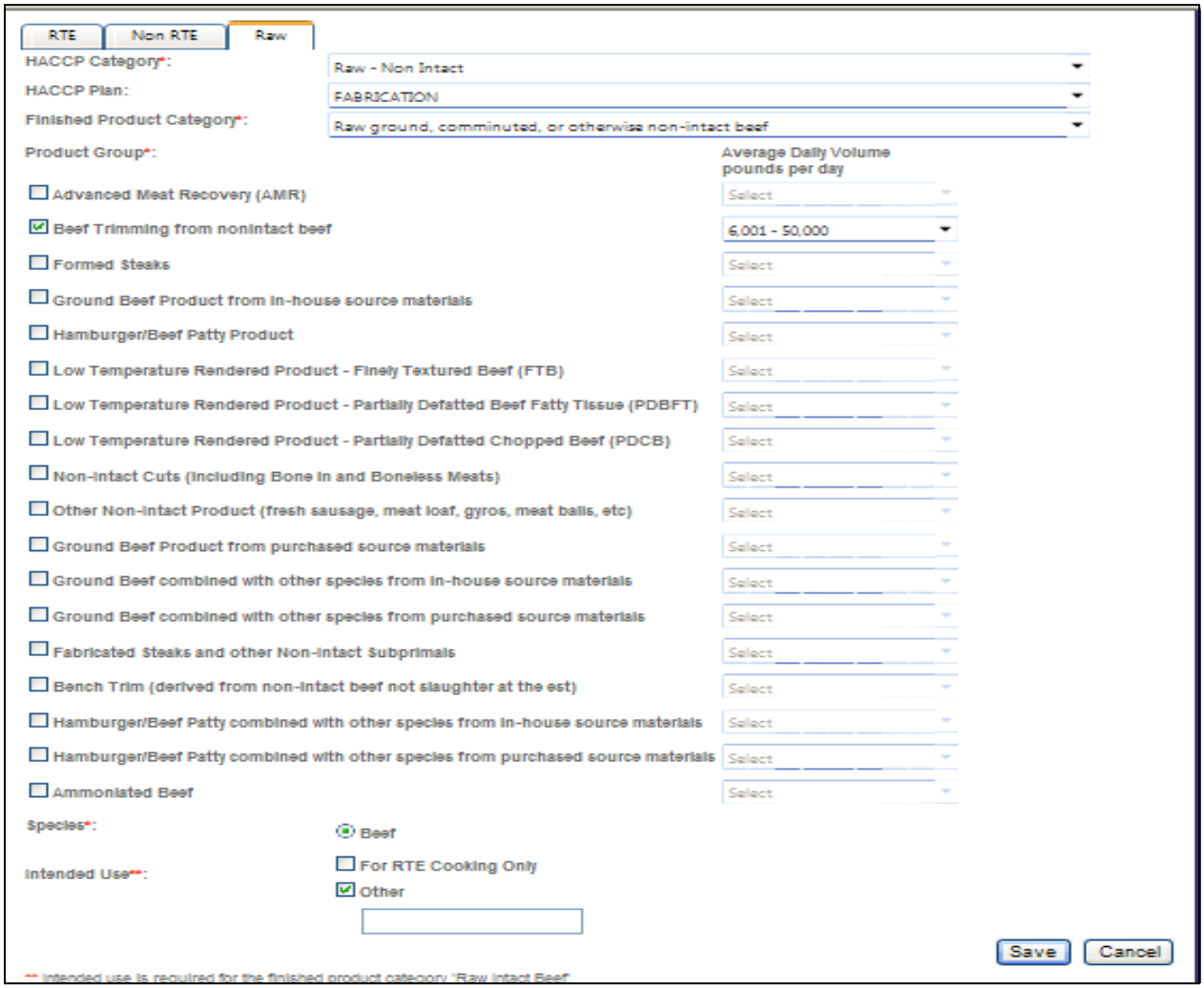


Figure 14. Ground Beef Product from Purchased Source Materials (MT55). On the "Raw" tab, for HACCP Category, select the "Raw Non-Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Ground Beef Product from purchased source materials" and enter the average daily volume. For Intended Use, select "Other."

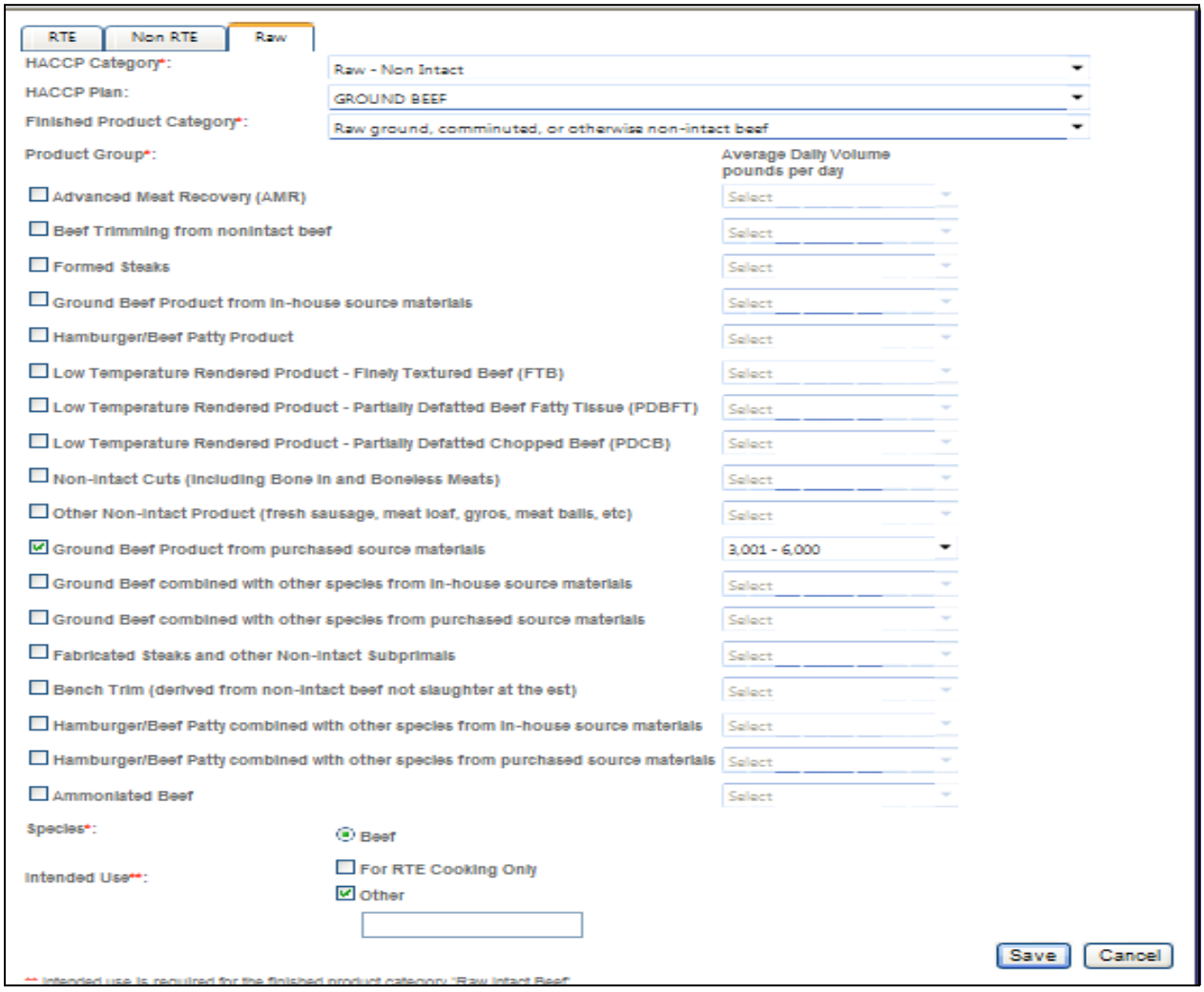


Figure 15. Ground Beef Combined with Other Species from Purchased Source Materials (MT55). On the "Raw" tab, for HACCP Category, select "Raw Non-Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Ground Beef combined with other species from purchased source materials" and enter the average daily volume. For Intended Use, select "Other."

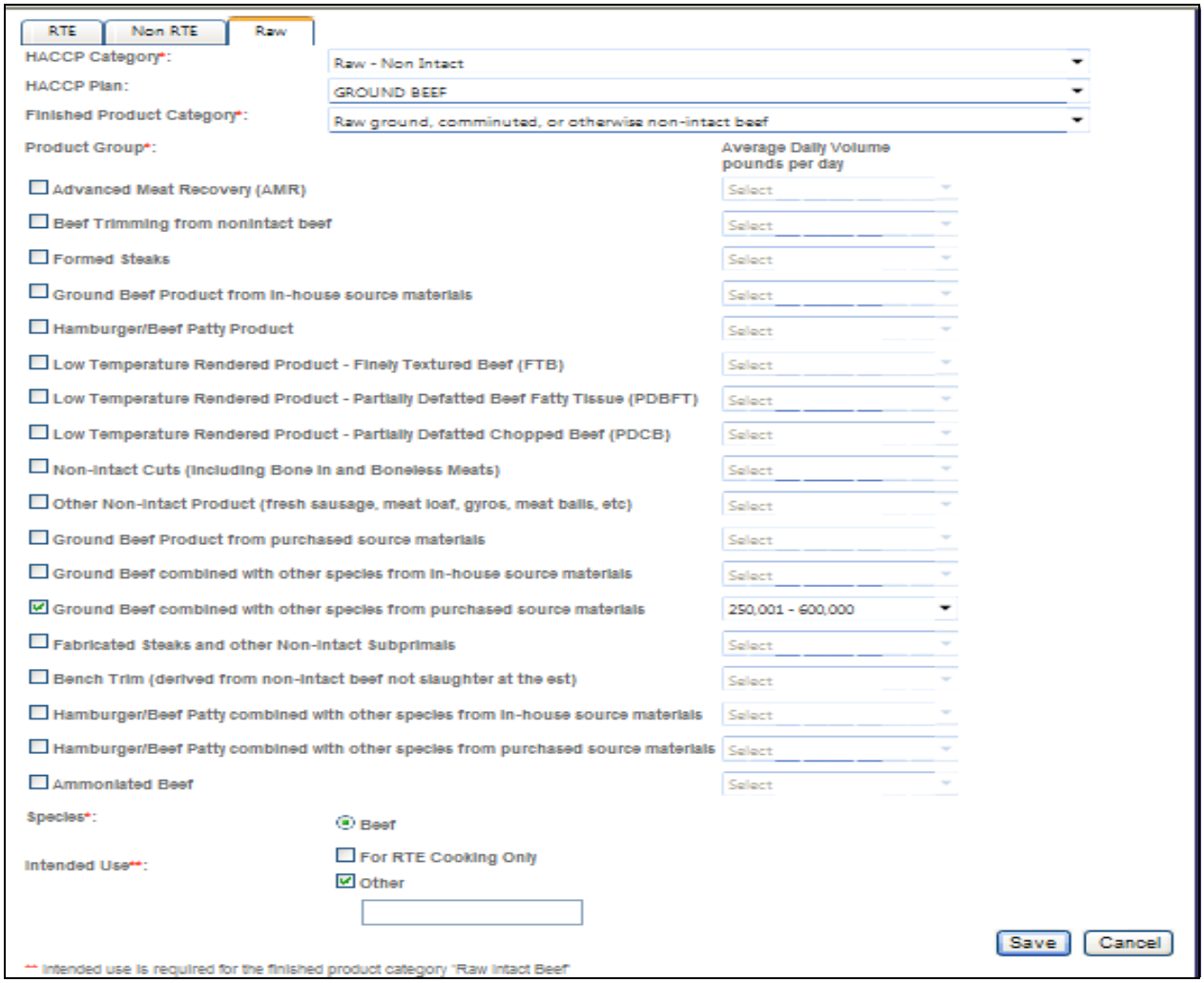


Figure 16. Hamburger/Beef Patty Combined with Other Species from Purchased Source Materials (MT55). On the "Raw" tab, for HACCP Category, select "Raw Non-Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Hamburger/Beef Patty combined with other species from purchased source materials" and enter the average daily volume. For Intended Use, select "Other."

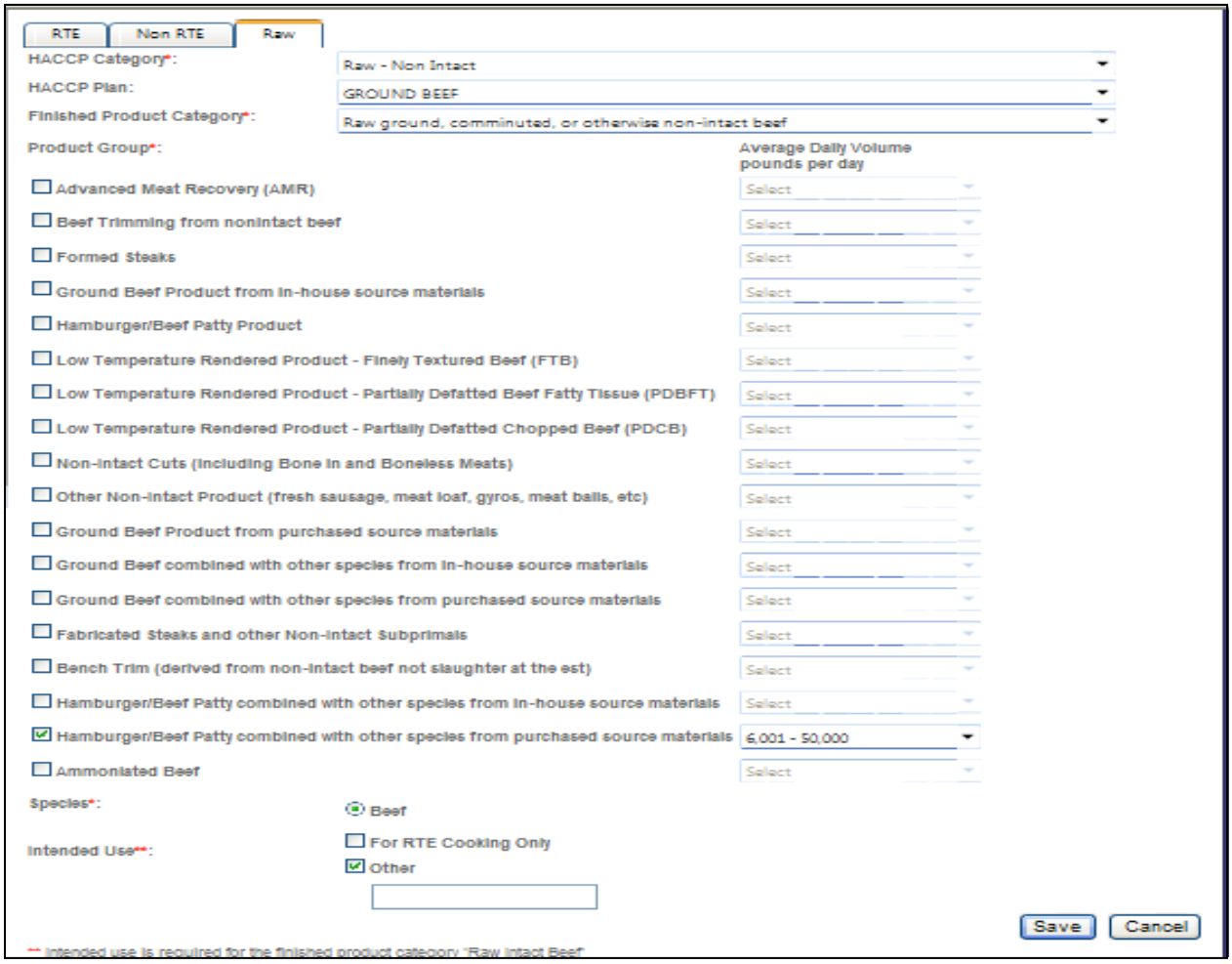


Figure 17. Hamburger/Beef Patty Product (MT55). On the “Raw” tab, for HACCP Category, select “Raw Non-Intact” and enter the name of the establishment’s HACCP plan. For Finished Product Category, select “Raw ground, comminuted, or otherwise non-intact beef.” For Product Group, select “Hamburger/Beef Patty Product” and enter the average daily volume. For Intended Use, select “Other.”

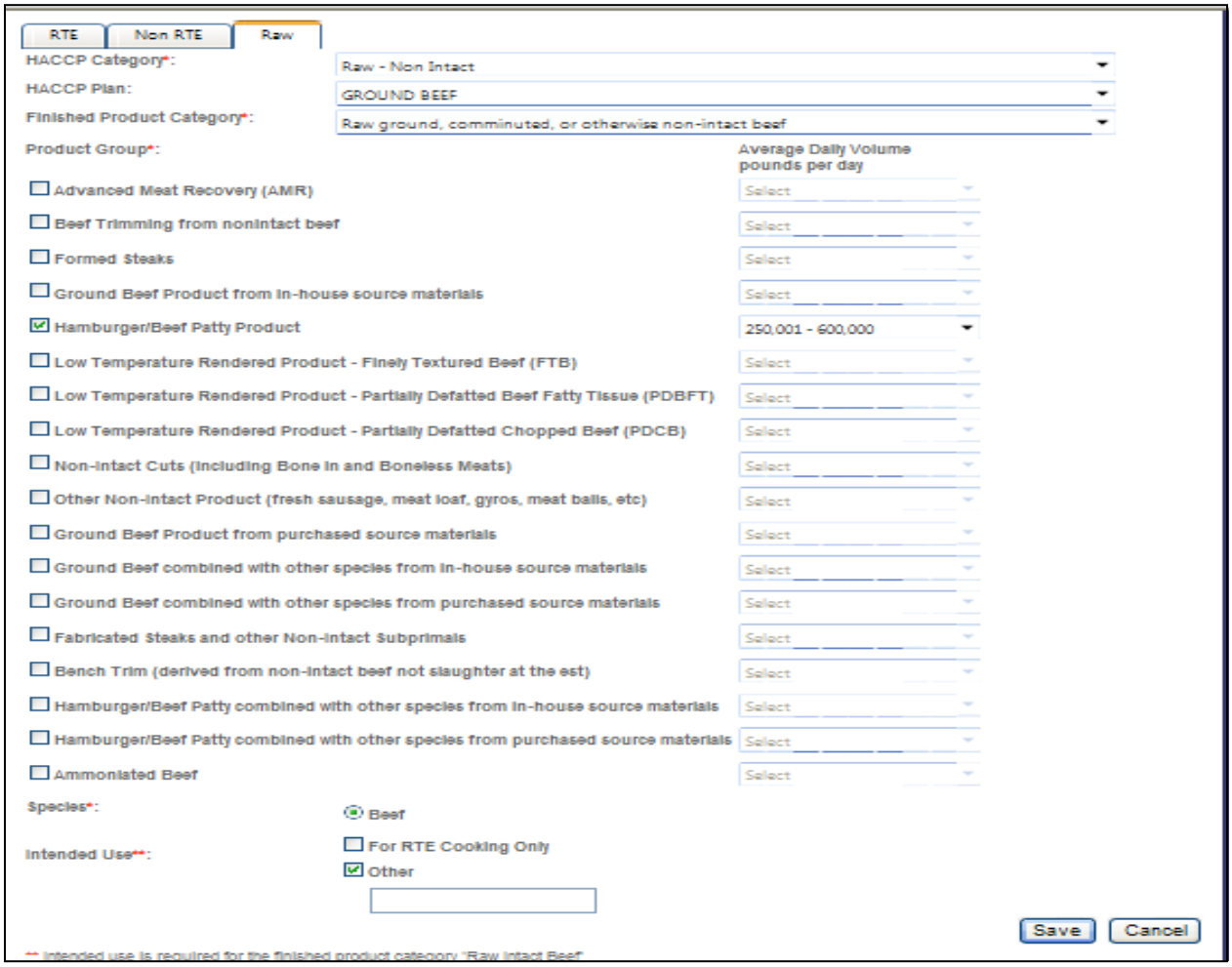


Figure 18. Other Non-Intact Product (fresh sausage, meat loaf, gyros, meat balls, etc.) (MT55). On the "Raw" tab, for HACCP Category, select "Raw Non-Intact." and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Other Non-Intact Product (fresh sausage, meat loaf, gyros, meat balls, etc)" and enter the average daily volume. For Intended Use, select "Other."

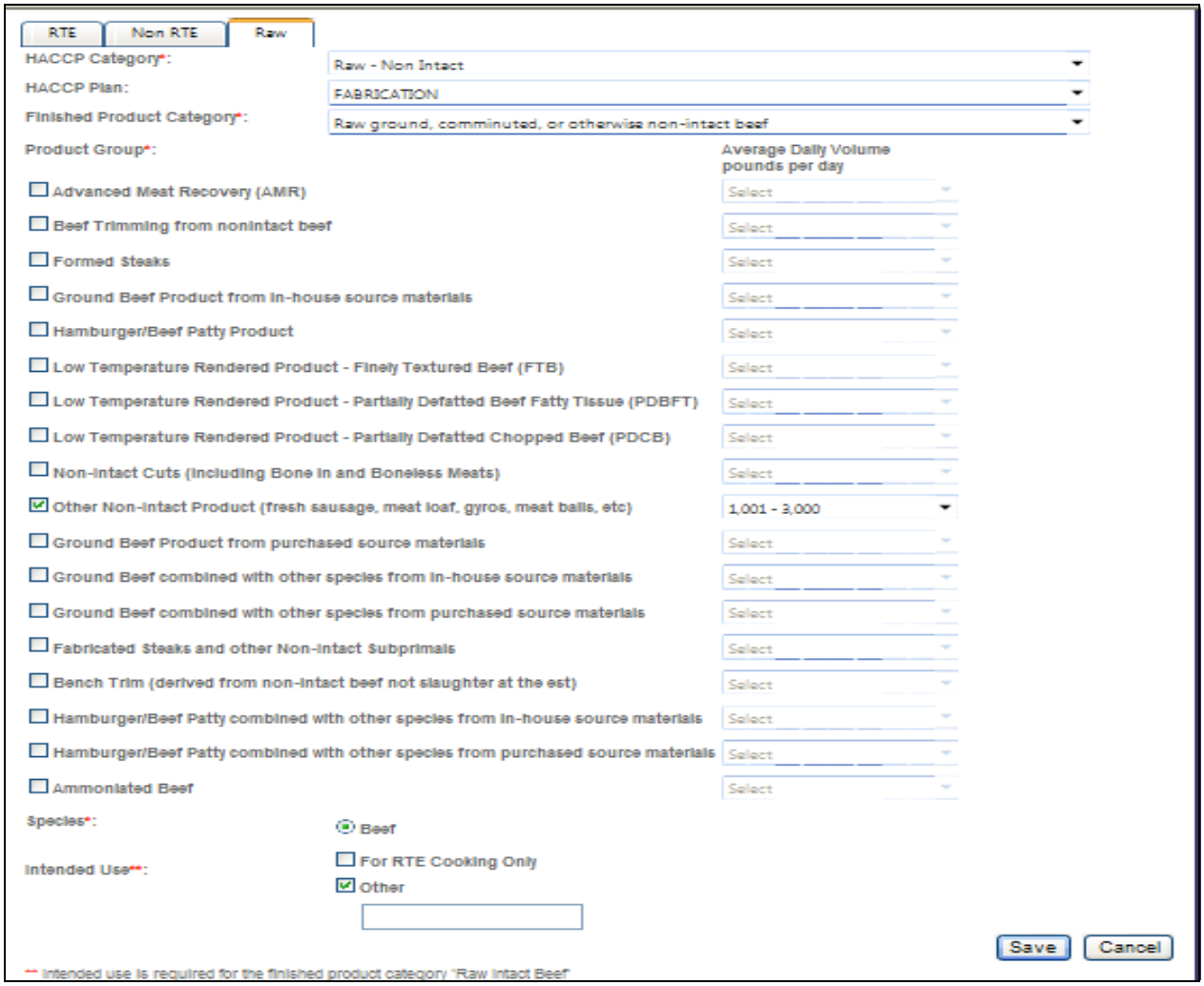


Figure 19. Mechanically tenderized products from purchased source materials (MT55). On the "Raw" tab, for the HACCP Category, select "Raw Non-Intact" and enter the name of the establishment's HACCP plan. For Finished Product Category, select "Raw ground, comminuted, or otherwise non-intact beef." For Product Group, select "Mechanically tenderized products from purchased source materials" and enter the average daily volume. For Intended Use, select "Other."

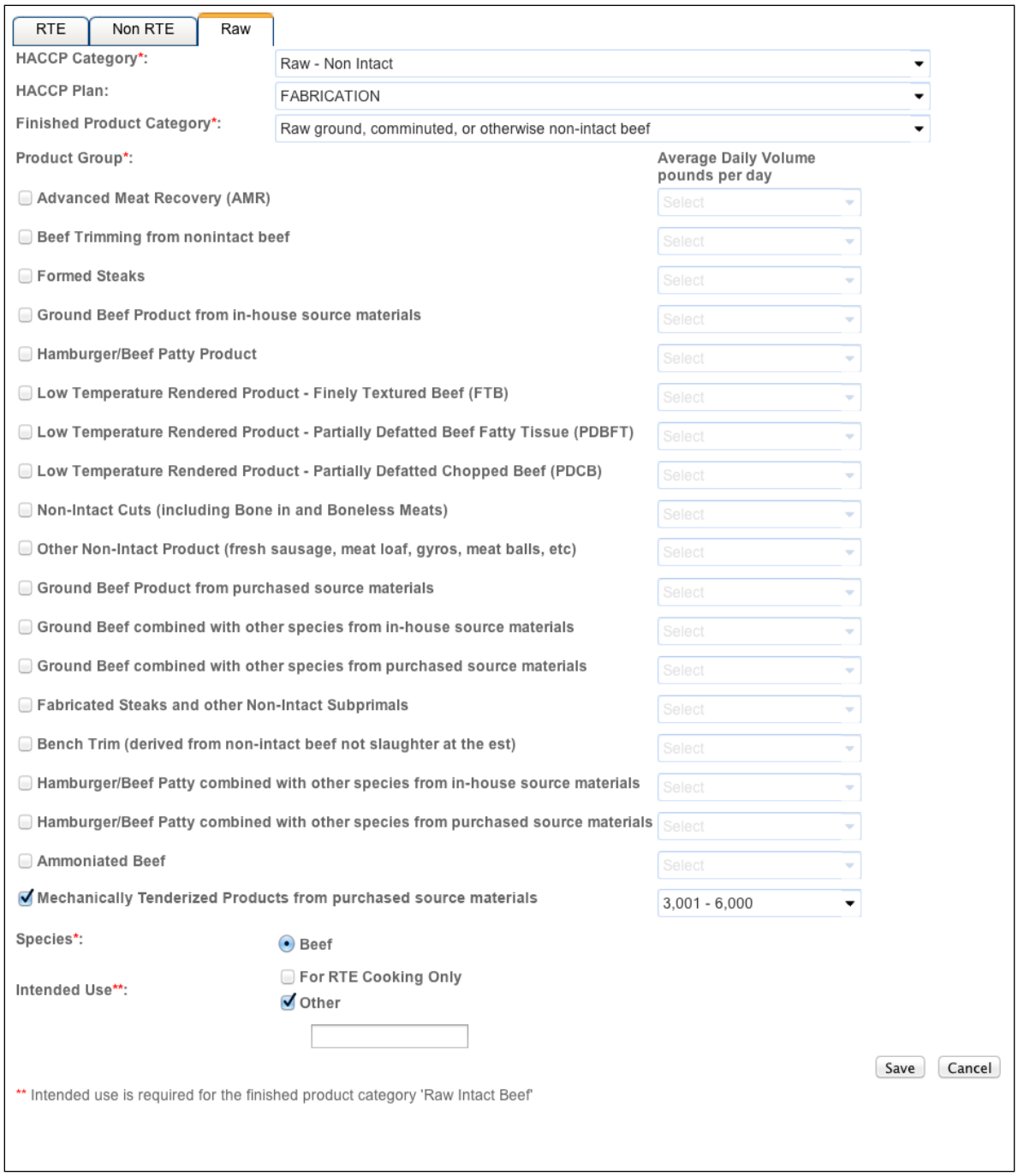
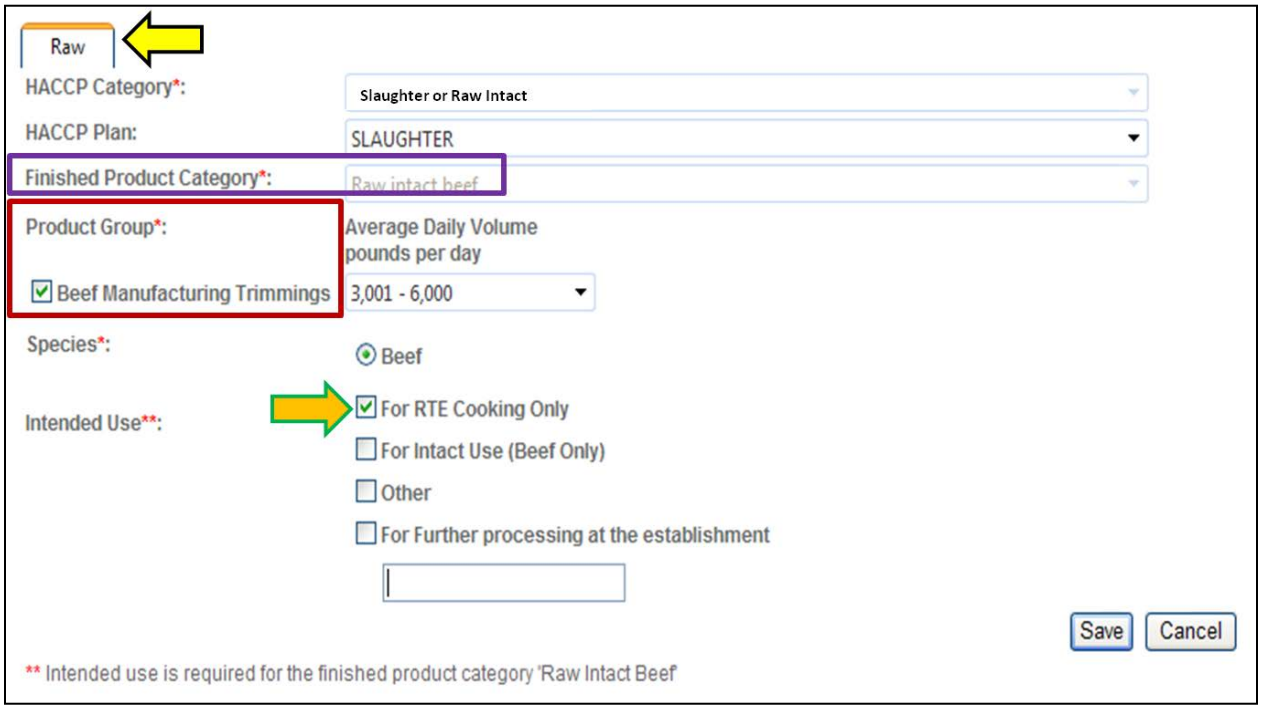



Figure 20. PHIS Profile example for a product that is intended for use in ready-to-eat (RTE) products at another federally inspected establishment. Do not select any other intended uses.