



United States Department of Agriculture
Food Safety and Inspection Service
Office of Policy and Program Development
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REGULATIONS AND DIRECTIVES DEVELOPMENT

Resource 2

Determine Whether the Product Is a Deli or Hotdog Product

- Now that you know which of your products is applicable to the new *Listeria* rule (i.e., post-lethality exposed RTE), determine whether your product is a **deli** or **hotdog** product, as defined in the rule.
- Deli products are RTE meat or poultry products that are typically sliced, either in an official establishment or after distribution from establishment, and typically assembled in a sandwich for consumption, e.g., spiral cut bone-in hams; bologna; boiled/baked ham; roast beef; turkey breast; chicken roll.
- Typical hotdogs are RTE meat or poultry franks, frankfurters, weiners per 9 CFR 319.180 standard (thus, does not include products like bratwurst, polish sausage, other cooked sausages covered by 9 CFR 319.140).

Determine the Control Measures Used for the Product and the Alternative Into Which Your Product Fits

- Now that you know which of your products are covered by the new *Listeria* rule (i.e., post-lethality exposed RTE), determine which alternative control measure your product fits into.
- Alternative 1 Product
 - Post-lethality treatment **and** antimicrobial agent/process.
 - The Post-lethality treatment and antimicrobial agent/process must each be documented to be sufficient to provide enhanced safety.
- Alternative 2 Product
 - Post-lethality treatment **or** antimicrobial agent/process
 - The Post-lethality treatment **or** antimicrobial agent/process must be documented to be sufficient to provide Enhanced safety.

- Alternative 3 Product
 - Use of sanitation measures only (in accordance with 9 CFR 430.4 (b)(3))
 - * May have post-lethality treatment and/or antimicrobial agent/process but not documented as being sufficient to provide enhanced safety
 - Special restrictions regarding potential adulteration of deli and hotdog products.
- Ingredients Statements
- Claims Based on Use of Antimicrobial Ingredients and Post-Lethality Treatments

e.g., Hotdog Ingredients: pork, water, beef, dextrose, salt, corn syrup, **sodium lactate**, flavorings (spice extractives, garlic powder), modified food starch, sodium phosphate, **sodium diacetate**, paprika, sodium erythorbate, sodium nitrite.
- Modifying an ingredients statement to add a safe and suitable antimicrobial agent may be done generically

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