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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FSIS is in the process of developing a mechanism for electronic submittal of comments via e-mail -- stay posted.