

National Advisory Committee on Meat and Poultry Inspection
September 25, 2020

Subcommittee II: FSIS Testing of Boxed Beef Primal and Sub-Primal Products for Shiga toxin-producing *E.coli*

CHARGE: FSIS asked NACMPI to review and advise whether FSIS should continue not to sample or test boxed beef primal and sub-primal products for STEC, if they are intended for intact cuts. FSIS sought input on how FSIS can reduce STEC positives, outbreaks, recalls, and deaths that occur when downstream processors are commonly unaware of the producer's intended intact use or the risks of grinding such products.

Recommendation 1: Strengthen the current system.

- 1.1. Put together a centralized resource in the form of a webpage on the FSIS website regarding intended use of box primal and sub-primal products and the associated risks with utilizing products intended for intact use for non-intact products.
- 1.2. Update current guidance to industry to recommend:
 - 1.2.1. Expanding current intended use statements to provide more information on the risks of utilizing products intended for intact use for non-intact products;
 - 1.2.2. Linking the FSIS website on intended use on the establishment or company webpage on intended use; and
 - 1.2.3. Including information on intended use in letters of guarantee and distribute this information to customers on an annual or more frequent basis.
- 1.3. Review existing agency sampling data from component projects and follow-up sampling projects for samples taken on primals/sub-primals intended for non-intact to inform whether an exploratory project on primals/sub-primals not intended for non-intact use is appropriate.

Recommendation 2: Conduct retail outreach and education efforts similar to the *Lm* project, with considerations for the varying size and availability of resources of different retailers and processors with retail exemption.

- 2.1. Conduct information gathering, possibly in the form of a roundtable, to determine the appropriate information and resources to provide retailers, along with viable pathways to distribute that information. Potential resources might include:
 - 2.1.1. Industry information on STEC controls,
 - 2.1.2. FSIS guidance on STEC controls, or
 - 2.1.3. Extension services.
- 2.2. Survey retail establishments at the beginning of the project and at pre-determined intervals to gauge effectiveness. Survey results might also drive FSIS sampling and future activities.
 - 2.2.1. Determine whether retailer grinds (or other non-intact use) primals and sub-primals intended for intact use. Potentially capturing volume, percentages to gauge the amount of product.
 - 2.2.1.1. Whole muscle grinding upon request.
 - 2.2.1.2. Bench trim grinding.
 - 2.2.1.3. Grinding whole muscle, not intended to be ground.

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- 2.2.2. Gauge understanding about intended use and the risk of STEC when utilizing products intended for intact use for non-intact products.
- 2.2.3. Determine whether controls for STEC are utilized when retailer grinds primals and sub-primals intended for intact use.
 - 2.2.3.1. Utilize a checklist of possible controls.
- 2.2.4. Determine whether retailers have HACCP Plans.
- 2.3. Determine whether including intended use in labeling would be beneficial as a reminder to retailers. Discuss this at information gathering with retailers and industry. Agency would be rethinking the current policy of not utilized intended use statements on labels for products intended for intact use.
- 2.4. Provide information to state and local health partners as another means of distribution.
- 2.5. Communicate efforts to federally inspected establishments for transparency, with the understanding that any labeling on intended use or educational efforts with retailers does not take away the responsibility to control STEC at the establishment.

Potential Invitees to a Roundtable:

The Food Institute (*Formerly the Food Marketing Institute*)
National Grocers Association
Consumer Brands Association (*Formerly the Grocery Manufacturers Association*)
The North American Meat Institute
Southwest Meat Association
American Association of Meat Processors
Niche Meat Processors Assistance Network
Association of Food and Drug Officials
International Foodservice Distributors Association

Recommendation 3: Discuss with the Food and Drug Administration the potential to incorporate into the Food Code controls for STEC for non-intact products produced from primals and sub-primals intended for intact use.

Building off of learnings and successes from *Lm* project and grinding logs.