Food Safety and Inspection Service
U.S. DEPARTMENT OF AGRICULTURE

FSIS Response to NACMPI 2020 Recommendations for FSIS Testing of Boxed Beef Primal and Subprimal Products for Shiga toxin-producing E. coli(STEC)

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NACMPI 2021 Meeting

Outline

- Overview of Topic
- NACMPI 2020 Charge
- Recommendations and FSIS Responses
- Next Steps

For more information on 2020 NACMPI presentations, recommendations and members, visit:
www.fsis.usda.gov/news-events/publications/2020-nacmpi-reports

Overview

- Shiga toxin-producing E. coli (STEC) cross-contamination occurs at slaughter. If contaminated, STEC is not "in" the intact muscle, but "on" the muscle.
- Raw non-intact beef products (e.g., ground beef products, tenderized steaks) present a significant public health risk because they are frequently consumed after preparation to a rare or medium rare state, that does not destroy STEC organisms that have been introduced below the product's surface.
    - FSIS **does** sample and test for STEC in non-intact products, or products intended for non-intact use.
    - FSIS **does not** sample and test for STEC in intact products, intended for intact use (e.g., steaks, roasts).
- Establishments produce larger portions (e.g., primals and subprimals), which they identify to be for intact use, and FSIS does not sample or test these types of products for STEC.
- Increasing evidence (e.g., STEC positives, recalls and outbreaks) shows these primal and subprimal products are being used (in whole or in part) to make ground beef at retail and sold to consumers.

National Advisory Committee on Meat and Poultry Inspection (NACMPI) September 2020 Charge

If an establishment identifies boxed beef primal/subprimal products as intended for intact cuts, should FSIS continue not to sample or test these products?

- *If Yes, how can the current system be strengthened?*
- *If No, what criteria should FSIS use to determine which products should be subject to sampling and testing for STEC?*

For both options:

- *What changes to FSIS sampling and testing, HACCP verification instructions, or regulations does the Committee believe would help affect the Committee's recommendations?*
- *What outreach methods and messages would be most effective to Federal establishments and retail firms?*

Overview of NACMPI Recommendations

Conduct roundtable with retailers of varying size (gather information) to determine:

- If primals are ground;
- If retailers have HACCP plans;
- If STEC controls are applied at retail;
- Understanding of intended use;
- Resources to provide; and
- Pathways to distribute information.

FSIS should create a centralized webpage to:

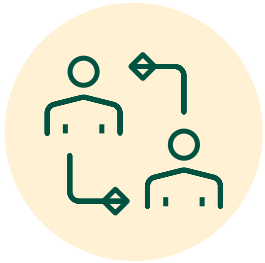
- Explain risks of not using products as intended;
- Link to company Letters of Guarantee;
- Include updated guidance for intended use statements to include more information on the risks, and recommendations on distribution frequency;
- Provide resources to state/local health partners for distribution;

FSIS should:

- Consider allowing intended use statements on product labels (while such labeling does not eliminate the establishment's responsibility to control STEC); and
- Discuss with FDA adding controls for STEC to the Food Code.

Measure rate of retailers following the intended use over time and build off lessons learned (e.g., Retail Deli project)

Progress Update – Retail Perspective and Roundtable



Conduct roundtable with retailers of varying size and gather information to determine:

- If primals are ground;
- If retailers have HACCP plans;
- If STEC controls are applied at retail;
- Understanding of intended use;
- Resources to provide; and
- Pathways to distribute information.

FSIS held a roundtable in April 2021.

- Small establishment associations, distributors/wholesalers, grocer organizations, large grocery chain and independent owner/operator;
- Varying levels of intended use understanding;
- Retailers that routinely grind primals (or trim thereof) do not have robust HACCP plans nor apply STEC controls; and
- Assumed the USDA mark meant it was safe.

Generalized Feedback:

- Pathogens should not leave the slaughter establishment; and
- The supply chain is built upon boxed beef (in whole or part) being ground. It's unreasonable to suggest otherwise.

Progress Update – Communication of Intended Use and Compliance

FSIS create a centralized webpage to:

- Explain risks of not using products as intended;
- Link to company Letters of Guarantee;
- Include updated guidance for intended use statements to include more information on the risks, and recommendations on distribution frequency; and
- Provide resources to state/local health partners for distribution.

FSIS should:

- Consider allowing intended use statements on product labels (while such labeling does not eliminate the establishment's responsibility to control STEC); and
- Discuss with FDA adding controls for STEC to the Food Code.

Measure rate of retailers following the intended use over time, and lessons learned.

There is a retail guidance section on the FSIS webpage for FSIS materials, and FSIS is considering developing an informational brochure on intended use.

Establishments are responsible for identifying their intended use and supporting their decisions; an FSIS maintained webpage is not appropriate.

Retailers do not understand "intended use," and past experience suggests further communications will have limited effect on changing customary industry practices.

Next Steps

Intended for a primal or subprimal to stay intact remains contrary to how such products are customarily used.

Neither establishments nor retailers have shown appetite to change.

FSIS is considering developing a brochure to communicate the concept of intended use.

FSIS is considering options to better align verification sampling with how products are being used, including:
- adequacy of webpage or invoice statements;
- labeling statements; and
- stronger verification for how products are used.

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