

## Addendum – 12/19/2024

### E14 *Listeria monocytogenes* Regulations Workshop on page 322

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6. You are a CSI assigned in August 2023 to an RTE establishment that produces post-lethality exposed deli meats under the Fully Cooked-Not Shelf Stable HACCP processing category. The establishment follows Alternative 3 (i.e. sanitation only to control *Lm*) for these products. In addition to testing food contact surfaces as required by regulation, the establishment incorporated environmental (non-food contact) sampling into its prerequisite *Listeria* Control Program. It also regards a presumptive positive *Listeria* spp. sample the same as a positive *Lm* result.

The establishment completed construction of a smokehouse in the RTE area three months earlier. Over the past few weeks, multiple environmental presumptive positive *Listeria* spp. results were received by the establishment. After determining corrective actions were implemented and documented, you review the establishment profile in PHIS. You verify that 30 noncompliances, seven of which were associated, were documented over the previous three months for SPS, Operational, and Pre-Operational SSOP deficiencies.

Review the following examples of establishment records and answer Exercise #6 questions.

#### **ESTABLISHMENT RECORDS:**

##### **May 23, 2023**, Establishment Record - Presumptive Positive *Listeria* spp. Findings

- Large floor drain in RTE room
- Floor at NW corner of entry from raw area into RTE room
- Corrective actions cited the following possible causes: Product roller rack moved from raw side to RTE room through smokehouses without first being cleaned and sanitized.
- All follow-up samples were negative for *Listeria* spp. after cleaning and sanitizing.

##### **June 3, 2023**, Establishment Record - Presumptive Positive *Listeria* spp. Findings

- Southeast floor drain in RTE room
- Line 3 splitter control box housing
- RTE room west wall seam
- Corrective actions cited the following possible causes: Raw side pallet jack in RTE room; product roller racks from raw area moved into RTE room without first being cleaned and sanitized; raw inedible barrel in RTE room.
- All follow-up samples were negative for *Listeria* spp. after cleaning and sanitizing.

##### **June 23, 2023**, Establishment Record - Presumptive Positive *Listeria* spp. Findings

- Vinyl curtain strips from RTE room entry door on product roller rack wash
- All follow-up samples were negative for *Listeria* spp. after cleaning and sanitizing.

##### **June 24, 2023**, Establishment Record -Presumptive Positive *Listeria* spp. Findings

- Floor in front of the entrance to blast freezer 6
- Cement floor at the entrance to blast freezer 6 broken and in pieces

- As of 7/23/23, the cement floor was not yet repaired. Establishment should schedule this with a contractor.
- All follow-up samples were negative for *Listeria* spp. after cleaning and sanitizing.

**July 1, 2023**, Establishment Record - Presumptive Positive *Listeria* spp. Findings

- Northwest floor drain in RTE room
- Corrective actions cited the following possible causes: Inedible barrel from raw area found sitting in RTE room hallway.
- All follow-up samples were negative for *Listeria* spp. after cleaning and sanitizing.

## **KNOWLEDGE CHECKS**

**Question 1:** Based on what you have reviewed in this scenario and your knowledge of FSIS Directive 10,240.4, what risk factors for *Listeria monocytogenes* can you identify (more than one answer may apply)?

- a. There are no risk factors.
- b. Increase in and repetitive presumptive positives for *Listeria* spp.
- c. Sanitation noncompliance related to equipment, SPS, and traffic flow as noted in corrective action information.
- d. Construction in the smokehouse.

**Question 2:** What information in this scenario would cause a CSI to escalate this up the supervisory chain of command (FLS and/or DO)?

- a. Repetitive presumptive positive *Listeria* spp. and ineffective corrective actions that indicate an inadequate HACCP system.
- b. Repetitive sanitation noncompliance, including cross contamination between raw side and RTE area.
- c. Noncompliance trends related to sanitation and HACCP.
- d. All the above.