

Subcommittee #2 Consideration of Mandatory Labeling Features for Certain Processed Not Ready to Eat Meat and Poultry Products

- 1) Should FSIS require statements, such as “Raw, “Uncooked,” “Ready to Cook,” on the labels of raw products that may appear ready to eat to convey that these products are not ready to eat?

Yes, the subcommittee believes that a mandatory statement should be used to differentiate these products. This should be based on findings from the focus group work discussed below. Given the activities ongoing with regard to the safe handling instructions, the Agency should possibly combine these two activities to ensure consistency messaging for consumers.

Focus Group

Building on the results of the previous RTI focus group study, the Agency should conduct a new focus group study to understand the optimal messaging and design of packaging to ensure consumer properly understand that not ready to eat products need to be cooked for lethality.

The focus group design should determine what messages such as, “Raw,” “Uncooked,” “Ready to Cook,” “Raw, Must Cook to XX°F,” “Raw, Must Cook to XX°F for Safety,” would have the desired impact. The focus group should also utilize open-ended questions. For example, important open ended questions to ask include:

- **What information on this package would help you understand that this product is raw and needs to be cooked?**
- **What information on a package makes you think that the product is ready to eat (not raw)?**

In addition, the focus group should:

- **Evaluate the effectiveness of standardized locations on label. For example evaluate placement in top left corner.**
- **Evaluate various color options, font, other display options to determine what best stands out to the consumer.**

- **Evaluate how best to convey “resting” and purpose to consumers**
- **Evaluate the effect of finished product “vignette” pictures on the label**

2) Should FSIS require that such products bear validated cooking instructions?

If so, aside from

(A) The method of cooking,

(B) An endpoint temperature of 165 degrees F,

(C) Instruction that the endpoint temperature is measured by use of a thermometer,

What other information is needed?

The subcommittee agrees that validated cooking instructions should be required for these products. The validated cooking instructions should include the method of cooking, the endpoint temperature for safety and instruction that the endpoint temperature is measured by a thermometer.

In addition to this information, the subcommittee recommends cooking instructions should include:

- **Disclaimer to not use microwave, if applicable**
- **Should include appropriate method for taking product temperature**
- **Instructions should make it clear to the consumer which steps should be followed for safety**

3) Are there other steps that FSIS should consider requiring to prevent illnesses involving these products?

The subcommittee recommends the following:

- **FSIS should develop a risk assessment to determine the risk of these types of products. The agency should work with other agencies (FDA) as appropriate).**

- **Should illness continue even after label changes are made**
 - **The Agency may need to create a standard of identity for these products.**
 - **FSIS should evaluate the need for a baseline microbiological study on these types of products by NACMPI and/or NACMCF.**
- **When implementing new labeling requirements, the Agency should consider a phased in approach to allow the use of existing labels.**
- **The Agency should continue to educate consumers on food safety issues. As part of this, the Agency should develop messaging that focuses on issues related to this topic to include:**
 - **Emphasizing reading the label (“Knowing your Label”)**
 - **Owning a meat thermometer**
 - **Knowing how to use the thermometer**
 - **Knowing how to use your appliances (calibrating your oven)**
- **The agency should continue to work with partners (for example: extension agencies, Partnership for Food Safety Education) for disseminating messages.**
- **The Agency should review programs such as “Cook it Safe” and other viable resources for effectiveness of microwave use for cooking and other methods for cooking frozen foods.**
- **The Agency should ensure alignment with FDA for like product labeling requirements.**
- **The Agency should consider partnering with FDA and the retail industry on how best to shelve products to mitigate possible confusion between ready to eat and the raw, not ready to eat products.**