

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

19-19

6/19/19

LABEL VERIFICATION OF IMPORTED RAW BEEF PRODUCTS LABELED “FOR COOKING ONLY” OR “FOR FULL LETHALITY TREATMENT”

I. PURPOSE

This notice provides instructions to inspection program personnel (IPP) for conducting verification of imported raw beef products bearing the “For Cooking Only” or “For Full Lethality Treatment” instructional statement claims. This notice supersedes the instruction in Chapter IV (Section II, D) of [FSIS Directive 10,010.2, Verification Activities for Shiga Toxin-Producing Escherichia Coli \(STEC\) in Raw Beef Products](#), which is applicable only to import reinspection of raw beef products certified to a Federal establishment which applies cooking or a full lethality treatment to eliminate STEC.

NOTE: These instructional statements can only be applied to raw beef testing negative for STEC or that is untested. Raw, non-intact beef and raw beef intended for non-intact use presented for importation and determined to be either positive or presumptive positive for STEC at the time it is offered for importation is adulterated and is not permitted entry into the United States (U.S.) ([9 CFR 327](#)).

II. BACKGROUND

A. “Cooking” is applying heat to a product at a sufficient temperature and for a sufficient period of time to eliminate STEC. “Full Lethality Treatment” may be cooking or another process that eliminates STEC. [9 CFR 412.1\(e\)](#) requires instructional statement claims concerning pathogens to be approved by FSIS Labeling and Program Delivery Staff (LPDS) prior to use. For labeling guidance available to industry see [FSIS Labeling Policy Requirements](#) and the [FSIS Compliance Guideline for Label Approval](#).

B. Use of these instructional statement claims is optional, pending label approval, and is not a control for STEC. LPDS will consult with the International Equivalence Staff to ensure labels are approved only for countries that are eligible to export raw beef products to the U.S. When approved, imported raw beef products negative for STEC or untested, are now eligible to bear the “For Cooking Only” or “For Full Lethality Treatment” instructional statement claims when shipped to official establishments for cooking or full lethality treatment.

C. Raw beef products bearing the “For Cooking Only” or “For Full Lethality Treatment” instructional statement claims can only be further processed in official establishments and cannot be exported, sent to State-inspected establishments, or enter commerce. These products can be shipped through ID Warehouses or official establishments, pending delivery to the official establishment which applies cooking or full lethality treatment to eliminate STEC.

DISTRIBUTION: Electronic

NOTICE EXPIRES: 7/1/20

OPI: OPPD

III. IPP RESPONSIBILITIES AT IMPORT ESTABLISHMENTS

A. IPP are to verify instructional statement label claims in accordance with *Qualifiers, Claims, Grade or Declaration Concerns* (Section VI, G) in [FSIS Directive 9900.5, Label Verification of Imported Meat, Poultry, and Egg Products](#).

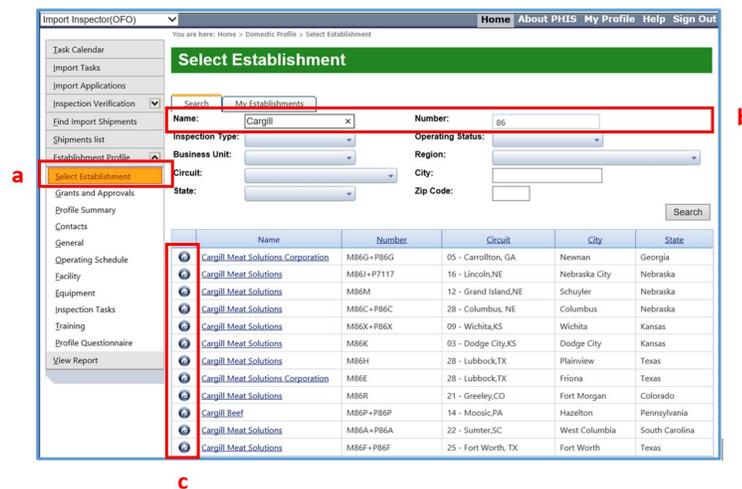
B. IPP are to verify instructional statement label claims for each lot presented, in accordance with [FSIS Directive 9900.1, Imported Product Shipment Presentation](#).

NOTE: All instructional statement label claims must be evaluated by LPDS prior to use. The instructional statement claim is not a control for STEC and is not a control for movement of product.

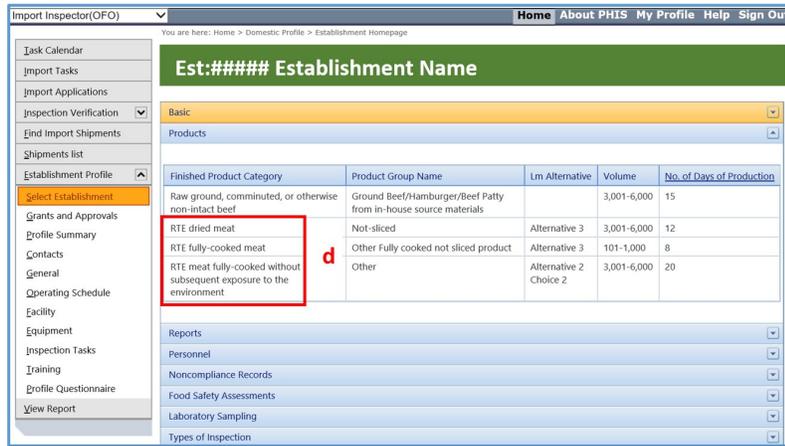
C. IPP are to verify the “For Cooking Only” or “For Full Lethality Treatment” instructional statement claims through review of supporting documentation provided by the importer and the intended destination as described in D below. If IPP have concerns regarding label claims, IPP are to retain the lot, use the Lot Tracking function in the Public Health Information System (PHIS) to select “Place the lot on hold” and contact their Frontline Supervisor (FLS).

D. To verify that the lot is intended to be cooked or receive a full lethality treatment by a Federal establishment, IPP are to:

1. Review contracts, bills of lading, letters of guarantee, agreements or other supporting documentation from the importer of record indicating how the lot will be handled to ensure the lot will be cooked or receive full lethality treatment; and
2. Review the import inspection application (Form 9540-1) to determine the destination establishment name and number (the consignee) and verify the establishment conducts ready-to-eat (RTE) processing in PHIS. Specifically, IPP are to:
 - a. Select the “Establishment Profile” dropdown;
 - b. Select “Select Establishment” to search for the establishment using the establishment number;
 - c. Select the homepage icon next to the designation establishment; and



- d. In the Establishment Homepage, select the “Products” tab to verify a “RTE” Finished Product Category is listed (RTE fully-cooked meat, RTE dried meat, etc.).



E. In addition to the Label Verification Type of Inspection (TOI) result (Pass/Fail), IPP are to record the “For Cooking Only Claim” or “For Full Lethality Treatment Claim” in the remarks to track imported lots bearing these claims.

Result:

Remarks: For Cooking Only Claim sent to Est. #####

F. In accordance with the *Intended Use and Sampling Eligibility* (Section III, B) of [FSIS Directive 10.010.1 Sampling Verification Activities for Shiga Toxin-Producing Escherichia Coli \(STEC\) in Raw Beef Products](#), IPP are not to sample raw beef products labeled “For Cooking Only” or “For Full Lethality Treatment.”

1. In accordance with [FSIS Directive 9900.6 Laboratory Sampling Program for Imported Meat, Poultry, and Egg Products](#) (Section VI, C), IPP are to request through PHIS not to perform a laboratory sample TOI assigned by PHIS when they determine that the TOI is not applicable to the product. IPP are to select “Instructional Claim: Cook/Lethality at Federal Est.” as the Reason.

TOI	Status	SME-Status Decision	Sample Form ID	Request to Not Perform	Reason	TOI Result Explanation
▶ E. coli O157:H7 MT51	Assigned			<input checked="" type="checkbox"/>	Select	

IV. QUESTIONS

Refer questions regarding this notice to the Office of Policy and Program Development, Import/Export Policy Development Staff through [askFSIS](#) or by telephone at 202-690-4354. When submitting a question, use the **Submit a Question** tab, and enter the following information in the fields provided:

- Subject Field: Enter **Notice 19-19**.
 Question Field: Enter question with as much detail as possible.
 Product Field: Select **Import** from the drop-down menu.

Category Field: Select **Basic Import Answers** from the drop-down menu.
Policy Arena: Select **International (Import/Export)** from the drop-down menu.

When all fields are complete, press **Continue**.

NOTE: Refer to [FSIS Directive 5620.1](#), *Using askFSIS*, for additional information on submitting questions.

A handwritten signature in black ink that reads "Subrata J. Wagner". The signature is written in a cursive style with a large, stylized initial 'S'.

Assistant Administrator
Office of Policy and Program Development