

May 2013

Summary of Comments and Responses on Draft Survey of Beef Operations

FSIS announced the availability of a survey of beef operations and requested comments on it in the February 8, 2013, *Constituent Update*. As explained in the *Constituent Update*, FSIS inspection program personnel would collect information and respond to this survey. FSIS received five comment letters on the draft survey. Two industry associations supported the survey. A couple of the comments submitted were not directly related to the survey. For example, one association requested that FSIS identify industry changes since 2008, and three public comments did not address the survey questions. FSIS made several changes to the survey in response to the comments. Comment summaries and Agency responses follow.

Comment: One association stated that FSIS should explain how information from the survey will be used.

Response: The purpose of the survey is to gather information on the controls and procedures beef slaughter and processing establishments have in place to address pathogen contamination and ensure that their systems are effective. FSIS will also use the data to inform its sampling and testing procedures, to evaluate whether changes to current procedures are appropriate and necessary, and for various other purposes, such as to update the economic analysis associated with FSIS expanding its testing of raw beef products for all shiga-toxin producing *Escherichia coli* (STEC) that would adulterate such product. FSIS will not use the survey results as a basis for issuing noncompliance records (NRs) or enforcement actions.

Comment: Two industry associations stated that certain survey answers would lead to the establishment receiving regulatory noncompliance records.

Response: FSIS added language to the beginning of the survey and to the survey instructions that it will deliver to personnel over e-mail and through the survey instrument that makes clear that the survey is not designed to determine noncompliance. FSIS also added answer choices such as "N/A" or "cannot determine based on available records or my observations" for particular questions. These answer options will not indicate noncompliance. For example, FSIS added the answer option "cannot determine based on available records or my observations" to a question regarding the percentage of cattle that receive pre-harvest treatments.

Comment: Two industry associations suggested that FSIS clarify certain questions and answer choices.

Response: FSIS modified questions and added new ones to improve question clarity, particularly for questions regarding interventions, High Event Periods (HEPs), and process control.

Comment: One industry association requested that FSIS eliminate estimated annual cost questions from the survey.

Response: The Agency removed from the survey the questions concerning costs because such data would be difficult for inspection personnel to identify.

Comment: One industry association requested that FSIS rename the survey to “STEC and *Salmonella* Survey”.

Response: The survey contains some questions on *Salmonella*, indicator organisms, interventions, and other topics relating to pathogen control. FSIS renamed the survey, “Pathogen Controls in Beef Operations Survey,” to better describe the survey.

Comment: One industry association requested that FSIS share survey results with stakeholders.

Response: FSIS intends to post summary results of the survey. FSIS will evaluate the results and make necessary changes to its procedures based on this analysis. FSIS will announce changes it intends to make to constituents prior to implementation.