

Subject: *Trichinella*/Fresh Raw Pork Products/Consumer Cooking Practices/Supporting Hazard Analysis

Question:

FSIS has removed prescriptive requirements for *Trichinella* treatment and establishments now have the flexibility provided by the Hazard Analysis and Critical Control Point (HACCP) regulations (9 CFR part 417) to develop appropriate science-based controls and preventive measures for *Trichinella* and other parasitic food safety hazards in pork. Establishments producing pork products should assess in their hazard analysis to determine if *Trichinella* and other parasites are hazards reasonably likely to occur (RLTO) or not reasonably likely to occur (NRLTO) in their processes. The prescriptive requirements in 9 CFR 318.10 were removed because the regulations were inconsistent with the HACCP regulations.

How should establishments consider consumer cooking practices when addressing controls for *Trichinella* in their HACCP systems for raw products that are customarily safely prepared by consumers?

Answer: FSIS anticipates that there will be little to no change for establishments as they were previously required to address *Trichinella* in their hazard analysis before the implementation of the final rule “Elimination of Trichinae Control Regulations and Consolidation of Thermally Processed, Commercially Sterile Regulations” ([83 FR 25302](#)). The final rule became effective July 30, 2018.

Raw and undercooked pork products may present a public health risk when consumed. Of concern, are those pork products:

- Prepared in such a manner that the product might be eaten rare or without thorough cooking because the appearance of the finished product makes it hard for the consumer to visually determine if the product has been fully cooked. Such pork products include ground meat mixtures including those containing pork and beef as well as pork and other ingredients; poultry products containing pork muscle tissue; bacon wrapped products; breaded pork; raw marinated pork in dark sauces; pork products containing ingredients such as annatto, red wine, paprika, red pepper, etc. that can alter the appearance; cured pork; and cured and smoked pork. ; and
- Prepared from feral swine that have an increased risk of infection with *Trichinella*.

When the pork products described above are not cooked at a sufficient internal temperature, any *Trichinella* present may not be destroyed and these products are therefore not rendered safe under normal consumer preparation practices. This is not the case for all raw fresh pork products, specifically those that are customarily well-cooked in the home or elsewhere before being served to the consumer. Such products include fresh pork from market swine, including fresh unsmoked sausage containing

pork muscle tissue, and bacon and jowls that were previously listed in 9 CFR 318.10(a). These products are usually prepared at an internal cooking time and temperature combination sufficient to destroy *Trichinella* throughout the product (e.g., 145° F for 3 minutes), which renders the product safe under normal consumer preparation practices. If determined to be NRLTO, an establishment may support this decision in the aforementioned raw fresh pork products by justifying that they are customarily well-cooked as described in Chapter I., Section III., C. of [FSIS Directive 7320.1, *Prevention and Control of Trichinella in Pork Products*](#).

Subject: Trichinella/Fresh Raw Pork Products/Noncompliance

Question:

Should FSIS inspection program personnel (IPP) document a noncompliance record (NR) when an establishment has determined that *Trichinella* is NRLTO in fresh raw pork products from market swine and has justified the decision because those products are customarily well-cooked and the product bears Safe Handling Instructions (SHIs)?

No. Establishments may determine that *Trichinella* is NRLTO in fresh raw pork products produced from market swine, only if they have support that the product(s) are customarily well-cooked in the home or elsewhere before being served to the consumer. Such products include fresh pork, including fresh unsmoked sausage containing pork muscle tissue, and bacon and jowls that were previously listed in 9 CFR 318.10(a).

If *Trichinella* is determined to be NRLTO in an establishment's hazard analysis, IPP are to review the decisions made and determine whether supporting documentation is on file to comply with [9 CFR 417.5 \(a\)\(1\)](#), and whether that documentation supports the decisions made in the hazard analysis. Support may include consumer preparation practices, such as SHIs or special handling/descriptive cooking instructions to ensure their customers will prepare the product in a manner that is customarily well-cooked.

If IPP have questions after reviewing [FSIS Directive 7320.1](#), *Prevention and Control of Trichinella in Pork Products*, regarding the adequacy of the establishment's support, they are to seek guidance from their immediate supervisor or an Enforcement, Investigation, and Analysis Officer (EIAO) to determine whether there is a basis to question the adequacy of support for the hazard analysis.