

OKLAHOMA DEPARTMENT OF AGRICULTURE,
FOOD, AND FORESTRY
MEAT AND POULTRY INSPECTION SERVICE
OKLAHOMA CITY, OK

<h1 style="margin:0">MPI NOTICE</h1>	401	04/07/2011
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NOTICE OF REASSESSMENT FOR *ESCHERICHIA COLI* O157:H7 CONTROL FOR ALL BEEF OPERATIONS

I. PURPOSE

FSIS Notice 65-07 was released on October 12, 2007, which described some significant developments involving *E. coli* O157:H7 in beef products produced in federally inspected establishments since April, 2007. FSIS has determined that these developments constitute changes that could affect an establishment's hazard analysis or cause the establishment to alter its HACCP plan and, as a result, a reassessment of their HACCP plans for beef operations is required. Beef operations are defined as: any official establishments that slaughter, fabricate, grind, mechanically tenderize, or enhance by tumbling, massaging, or injecting beef products such as with marinades.

The developments described in FSIS Notice 65-07 have not been observed in beef products produced in Oklahoma MPI inspected beef operations. However, since most of the Oklahoma Inspected establishments which conduct beef operations rely on federally inspected products as source materials for their operations, it is prudent for them to consider the implications of these developments on their operations, and to reassess their HACCP plans.

II. REFERENCE

FSIS Notice 65-07

III. INSPECTION PROGRAM PERSONNEL RESPONSIBILITIES

A. Awareness Meeting

1. By March 14, 2008, inspection program personnel at all beef operations are to conduct an awareness meeting with a management official of the establishment. At the meeting, inspection program personnel are to discuss:

a. the developments identified in FSIS Notice 65-07 Attachment 2, Developments That Support That There Is A Need For Establishments To Reassess Their HACCP Plans;

b. the documents referenced in this notice, including the Response to the Reassessment and the *E. coli* O157:H7 Checklist; and

AN EQUAL OPPORTUNITY EMPLOYER AND PROVIDER

c. that the reassessment of the HACCP plan should be conducted by **March 28, 2008**.

NOTE: Inspection program personnel should prepare for the awareness meeting by reading FSIS Notice 65-07 Part I – Purpose, Part II – Background and Attachment 2, paying particular attention to Parts C, D and E.

NOTE: **Awareness Meeting Discussion Points:**

FSIS Notice 65-07 Attachment 2; the preference is for the IIC to print out Attachment 2 and give a copy to plant management during the discussion. Either hand a copy to plant management or get an e-mail address and send them a copy by e-mail. The MOI should document that Attachment 2 was e-mailed or handed to plant management and to who it was e-mailed to or handed to and when plant management should expect to receive it.

- Discuss all points, in particular E (2):

Components beyond the traditional boneless manufacturing trimmings include: Two-piece chuck (a primal/sub-primal cut); head meat; cheek meat; weasand meat; heart meat; low temperature rendered beef (also referred to as lean finely textured beef); “specially handled beef” (a product treated with an antimicrobial and designated for grinding at retail via a purchase specification arrangement with the retailer); and meat from advanced meat recovery systems (AMR).

- 417.4 (a)(3) which is in attachment 1; Emphasize the reassessment shall be performed by an individual trained in accordance with Sec. 417.7.
- Tell plant management about Attachment 3 and go over it with them.
- **Reassessment** must be conducted by **March 28, 2008**.
- Provide plant management a copy of Attachment 1 of this Notice which contains definitions of best practices and robust testing. Explain to plant management that these are suggested as compliance guidelines and are not regulatory requirements.

2. Inspection program personnel are to prepare a memorandum of interview for the awareness meeting, documenting the following:

- a. who was present at this initial awareness meeting;
- b. the date and time of the meeting;
- c. what was discussed, and
- d. any documents that were shared with the management official.

3. Inspection program personnel are to maintain a copy of the memorandum in the official government file and provide a copy to the establishment management.

B. Verification Responsibilities

1. At the next weekly meeting after March 28, 2008, inspection program personnel are to ascertain whether and how the establishment reassessed. Inspection program personnel are to complete the questions in Attachment 3 of FSIS Notice 65-07, Responses to the Reassessment, and submit the answers by no later than **April 11, 2008**.

2. Inspection program personnel are to complete the reassessment questions in Attachment 3 in lieu of performing a food safety 01 or 02 procedure. To determine the product for which the scheduled 01 or 02 will not be performed, inspection program personnel are to use the chart in Attachment 4 of FSIS Notice 65-07. Procedures for products with the lowest risk factor are to be replaced first.

3. Inspection program personnel are to save the answers to Attachment 3 in a Word document. Inspection program personnel are to maintain a copy of Responses to the Reassessment in the official government file, provide a copy to the establishment management, and, e-mail the Word document to:

- a. the Circuit Supervisor,
- b. Meat Inspector Supervisor, and
- c. the Oklahoma City Office.

Refer all questions through supervisory channels.

Stan Stromberg
State Director

DISTRIBUTION:
All MPI Personnel

SUBJECT CATEGORY
HACCP/SSOP

RAW BEEF FOOD SAFETY SYSTEM — The purpose of this section of the Checklist is to determine which establishments that produce raw beef products are engaging in *best practices* to prevent the adulteration of non-intact raw beef products by *E. coli* O157:H7. The best practices are interrelated and cumulative, i.e. best practices at grinding or at the production of some other non-intact finished products are directly tied to the steps taken at slaughter, as well as during further processing. The information you collect about which practices the establishment uses to eliminate, prevent, or reduce *E. coli* O157:H7 to a non-detectable level will be used by FSIS to schedule testing and other verification activities. As you answer the questions in this section of the Checklist, you will need to refer to the definitions of best practices, as well as the definition of “robust testing.”

Best Practices for Slaughter (03J) -- The implementation of a validated decontamination intervention, controlled through a CCP, to eliminate, prevent, or reduce *E. coli* O157:H7 to a non-detectable level.

Best Practices for Raw Not Ground (03C) -- The use of source materials from an 03J process that implemented best practices, along with: 1) the ongoing verification testing of source materials from all suppliers, at least quarterly, and using robust testing methods; and 2) the on-going verification testing of all finished product that is or will be used as non-intact raw beef, using robust testing methodology.

Best Practices for Raw Product-Ground (03B) -- The use of source materials from 03J and 03C processes that implemented best practices, along with: 1) the ongoing verification testing of source materials from all suppliers, at least quarterly, and using robust testing methods and with proportionally more frequent testing in high prevalence season months; and 2) the on-going verification testing of all finished product, at least monthly, using robust testing methodology and with proportionally more frequent testing in high prevalence season months. If the 03B process uses source materials from another 03B process (e.g. if an establishment regrinds course ground beef), all 03B processes involved would need to apply best practices.

Robust Testing means that the following features are part of the establishment’s written program defining how raw beef samples are collected and analyzed:

- For samples capable of excision testing, N-60 represents 375 grams or more of thinly sliced exterior surface tissue (60 slices derived from trim in up to 5 combo bins/boxes/other units -- 12 very thin slices of exterior surface materials from each combo bin//box/other unit): each slice should be approximately 1/8" thick, 4.0 inches in length, and 2.0 inches wide. The composite sample should weigh at least 2 pounds and consist of at least 60 slices placed together in an aseptic package); a 375 gram sample is enriched and analyzed using a method at least as sensitive and specific as the FSIS method. (For additional information on N-60 training, see FSIS Notice 18-07 and its associated training).
- For samples not capable of excision testing (e.g., comminuted product), a composite sample is collected representing all units from a specified time period

- (10-30 minutes for continuous testing; one sample from the entire production lot; grab samples from each combo bin/box/other unit); at least a 325 gram sample is enriched and analyzed using a method at least as sensitive and specific as the FSIS method.
- In slaughter operations (pre-chill), an establishment might swab carcasses as the method of sampling. Robust testing in this case would mean that entire sides, whereby 4000 cm² per side, are swabbed and analyzed using a method at least as sensitive and specific as the FSIS method (see T. M Authur *et al.* 2004. *E. coli* O157 Prevalence and Enumeration of Aerobic Bacteria, *Enterobacteriaceae*, and *Escherichia coli* O157 at Various Steps in Commercial Beef Processing Plants. JFP 67(4): 658-665).