**Conference for Food Protection**

**2012 Issue Form**

**Internal Number: 119**

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| **Council Recommendation:** | Accepted as  Submitted |  | Accepted as Amended |  | No Action |  |
| **Delegate Action:** | Accepted |  | Rejected |  |  |  |

*All information above the line is for conference use only.*

**Title:**

Beef Grinding Log Template for Retail Establishments

**Issue you would like the Conference to consider:**

The Food Safety and Inspection Service (FSIS) recommends that a CFP Committee be created to review the FSIS grinding log template and provide feedback to FSIS on its use at retail. The draft grinding log template will become the basis of the FSIS compliance guidelines that accompanies the planned proposed rule, "Records to be Kept by Official Establishments and Retail Stores That Grind or Chop Raw Beef Products". The FSIS proposed rule is expected to require establishments and retail stores to keep records that disclose the identity of the supplier of all source materials that they use in the preparation of raw ground or chopped product. FSIS is seeking feedback on the grinding log template and any additional comments on developing the log for use at retail.

In the interim, FSIS also recommends an update to the supporting documents for retail grinding logs in the Food Code Annex 2 (Page 305) so that retail establishments will have more detailed information on how to maintain grinding logs and understand its importance during recalls and outbreak investigations. Recently over the past few years, FSIS has been unable to determine the source suppliers of contaminated ground beef product because of inadequate retail grinding logs. FSIS developed and published a grinding log template and example on the FSIS website entitled "Sanitation Guidance for Beef Grinders" **http://www.fsis.usda.gov/PDF/Sanitation\_Guidance\_Beef\_Grinders.pdf**. FSIS will consider the feedback from CFP for incorporation into a future FSIS compliance guideline that will accompany the FSIS rule.

**Public Health Significance:**

Ground beef contaminated with pathogens such as Escherichia coli O157:H7 or Salmonella is a known source of illness. During outbreak investigations, traceback of contaminated beef to the producing facility is often unsuccessful because of inadequate recordkeeping at retail establishments that grind beef products. FSIS enforcement strategy relies heavily on being able to identify the source material and the producing facility.

FSIS has reviewed foodborne investigations in which FSIS investigators found that retail facility grinding logs were a limiting factor for the Agency's ability to pursue public health investigations. FSIS conducted a retrospective review of 16 investigations (2006 through 2008) in which beef products were ground or reground at retail stores. In only 5 of 16 (30%) of investigations, were records kept by the retail stores present and adequate to enable traceback to the official establishment supplying the beef. FSIS results are supported by Gould et al [Gould LH, Seys S, Everstine K, Norton D, Ripley D, Reimann D, et al. J Food Prot. 2011;74(6):1022-4] in a review of retail grinding records. Of 125 stores surveyed, 60(49%) kept grinding records. In those stores keeping grinding records, 22% of 176 records were judged complete (JFP 2011; 74:1022-1024). Schneider et al also reported a multistate outbreak with 42 illnesses. Investigators used shopper card information for 12 stores, but were unable to identify the identity of the source (JFP 2011, 74:1315-1319).

Additonal References:

* "Marler Clark calls on Hannaford to Release Meat Grinding Logs and Identify All Suppliers Linked to Salmonella Outbreak" 12/23/2011 - http://www.foodpoisonjournal.com/foodborne-illness-outbreaks/marler-clark-calls-on-hannaford-to-release-meat-grinding-logs-and-identify-all-suppliers-linked-to-s/
* Beef Grinding Logs Study: Restaurant Policies and Practices and Food Worker Practices/Behavior (CDC)http://www.cdc.gov/nceh/ehs/ehsnet/Restaurant\_Policies\_Practices.htm

**Recommended Solution: The Conference recommends...:**

**1.)** That a CFP Committee be created to:

a. review the FSIS grinding log template

b. Create a new committee to review the FSIS grinding log template and provide feedback to FSIS for consideration into the future FSIS compliance guide on retail grinding logs and on its use at retail

c. report back to the 2014 Biennial Meeting.

**2.)** That a letter be sent to the FDA to request amending the 2009 Food Code (as modified by the supplement issued in 2011) Annex 2 - Supporting Documents, References under Part 3, K Supplemental Documents (Page 305), using strike through to remove language and underline format to add language to read as follows:

K. Guidance for Retail Facilities Regarding Beef Grinding Logs Tracking Supplier Information

This document may be found at the web site for "Compliance Guidelines for Establishments on the FSIS Microbiological Testing Program and Other Verification Activities for Escherichia coli O157:H7" http://www.fsis.usda.gov/oppde/rdad/fsisdirectives/10010\_1/ecolio157h7dirguid4-13-04.pdf On October 7, 2002, USDA/FSIS published a Federal Register Notice (67 FR 62332) entitled, E. coli O157:H7 Contamination of Beef Products, http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002\_register&docid=02-25504-filed.pdf in which the Agency discussed its views on the application of the Hazard Analysis and Critical Control Point (HACCP) system regulations with respect to Escherichia coli (E. coli) O157:H7 contamination.

USDA/FSIS announced in 2002 that there is sufficient new scientific data on the increased prevalence of E. coli O157:H7 in live cattle coming to slaughter and on its impact on public health to require that all establishments producing raw beef products reassess their HACCP plans, in light of these data.

Of particular concern to the USDA/FSIS is its ability to quickly and adequately traceback ~~E. coli O157:H7~~ contaminated product that is in commerce to its source and to remove it from commerce. In Spring ~~March~~ 2004, FSIS began conducting sampling and microbiological verification testing for E. coli O157:H7 in raw ground beef products at federally inspected establishments, retail facilities, as well as at import facilities. ~~the agency issued "FSIS Directive 10,010.1; revision 1, Microbiological Testing Program and Other Verification Activities for Escherichia coli O157:H7 in Raw Ground Beef Products and Raw Ground Beef Components and Beef Patty Components" available at http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002\_register&docid=02-25504-filed.pdf. In this Directive, the Agency stated that, effective May 17, 2004, it would conduct sampling and microbiological verification testing for E. coli O157:H7 in raw ground beef products at federally inspected establishments, retail facilities, as well as at import facilities.~~ Some of the products most likely to be sampled and tested at retail facilities are:

* Ground beef products produced from retail steaks and roasts.
* Manufacturing trimmings derived at retail.
* Ground beef that is formulated at retail by co-mingling in-store trim and trim from federally inspected establishments.
* Irradiated ground beef co-mingled with non-irradiated meat or poultry.

Additionally, ground beef products have been implicated as a transmission vehicle in foodborne outbreaks of infection with pathogens such as Escherichia coli O157:H7 and Salmonella. To facilitate product traceback and to meet regulatory requirements, USDA/FSIS expects retail facilities as well as federally inspected establishments to maintain and provide FSIS with access to all applicable records associated with the source material used for ground beef products. In cases where USDA/FSIS identifies adulterated ground beef, ~~E. coli O157:H7 ground beef in a product,~~ and a product recall is necessary, grinding logs will facilitate identifying the source of the product and narrowing the scope of the recall.

FSIS recently published "Sanitation Guidance for Beef Grinders" which contains an example of a fresh ground beef production log. The guidance is located at the following website: http://www.fsis.usda.gov/PDF/Sanitation\_Guidance\_Beef\_Grinders.pdf

The following information would be used to facilitate traceback of contaminated ground beef products:

* The manufacturer name of source material used for product produced
* The type of product or description of the purchased or received article(s).
* The establishment information from the label of source product used such as the name, address, and establishment number.
* The supplier lot numbers, product code or production or pack date of source materials used.
* Any other information that would be useful in the quick removal of adulterated product from the market or commerce such as time of grind, grinder sanitation records, and amount (in pounds) and lot/batch numbers, production codes, name and package size of products produced.

In addition to the references cited above, the following references also provide information:

1. Federal Meat Inspection Act (21 USC Sec. 642).
2. Title 9 of the Code of Federal Regulations, section 320.1 Records required to be kept.
3. Guidance for Beef Grinders and Suppliers of Boneless Beef and Trim Products
4. Best Practices for Raw Ground Products
5. FSIS Sanitation Performance Standards Compliance Guide:
6. U.S. Department of Agriculture, Food Safety and Inspection Service, April 13, 2004, Compliance Guidelines For Establishments On The FSIS Microbiological Testing Program and Other Verification Activities For Escherichia coli O157:H7 http://www.fsis.usda.gov/oppde/rdad/fsisdirectives/10010\_1/ecolio157h7dirguid4-13-04.pdf

~~The following information would be adequate for meeting federal transaction requirements:~~

* ~~The name or description of the purchased or received article(s).~~
* ~~The name, address, and establishment number of the seller of the articles purchased or received.~~
* ~~The supplier lot numbers and production dates of the articles purchased or received.~~
* ~~Any other information that would be useful in the quick removal of adulterated product from the market or commerce.~~

~~In addition to the references cited above, the following references also provide information:~~

~~1. Federal Meat Inspection Act (21 USC Sec. 642).~~

~~2. Title 9 of the Code of Federal Regulations, section 320.1 Records required to be kept.~~

~~1. U.S. Department of Agriculture, Food Safety and Inspection Service, April 13, 2004, Compliance Guidelines For Establishments On The FSIS Microbiological Testing Program and Other Verification Activities For Escherchia coli O157:H7~~

~~http://www.fsis.usda.gov/OPPDE/rdad/fsisdirectives/10010 1/ecolio157h7dirguid4-13-04.pdf~~.

**Submitter Information:**

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| --- | --- | --- | --- |
| Name: | Jennifer Webb | | |
| Organization: | USDA/FSIS | | |
| Address: | Address: 1400 Independence Avenue, SW, 8th Floor, Cube , PP3 | | |
| City/State/Zip: | Washington, DC 20024 | | |
| Telephone: | 301-504-0854 | Fax: |  |
| E-mail: | jennifer.webb@fsis.usda.gov | | |

**Attachments:**

* "FSIS Sanitation Guidance for Beef Grinders"
* "Canadian Beef Good Retail Practices Ground Meat Management (Example Log)"
* "Multistate Outbreak of Multidrug-Resistant Salmonella Newport"
* "Recordkeeping Practices of Beef Grinding Activities Retail Establishments"
* "BIFSCO Best Practices For Retailer Operations Producing Raw Ground Beef"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.