

**Conference for Food Protection
2016 Issue Form**

Issue: 2016 III-036

Council Recommendation: Accepted as Submitted _____ Accepted as Amended _____ No Action _____

Delegate Action: Accepted _____ Rejected _____

All information above the line is for conference use only.

Issue History:

This is a brand new Issue.

Title:

“Intended Use” for Raw Beef Source Materials

Issue you would like the Conference to consider:

Federally inspected meat establishments produce whole-muscle, intact beef such as beef primal and subprimal cuts and identify their "intended use" for further preparing or processing into intact or non-intact beef products such as comminuted or mechanically tenderized beef (Refer to Chapter 1 of the 2013 FDA Food Code for definitions). They are required to identify the intended use for consumers of the finished product according to federal Hazard Analysis Critical Control Point (HACCP) regulations 9 CFR 417.2(a)(2). (<http://www.fsis.usda.gov/OPPDE/rdad/FRPubs/99-060Npm.htm>). Because of these regulations, beef producing establishments have an incentive to communicate and follow-up on how their beef products are used further down the supply chain in order to properly support their HACCP systems. It would also be in the retail facility's best interest to honor the producer's intended use, to avoid possible outbreaks from the product.

Retail establishments can be informed of the intended use from the supplying federal beef establishment in the following ways:

- A letter of intended use available on the supplying federal establishment's company website and references to the letter of intended use on the bills of lading.
- Federally inspected establishments may request that the retail establishment provide letters of guarantee showing that all beef product is used in raw intact product only and maintains on-going communication to verify that all beef product is being processed as raw intact product only.
- A contractual agreement with the receiving firm so the firm has knowledge of the supplying federal establishment intended use or facility's production process.
- Federally inspected establishments may use designated codes to identify the intended use of their production lots.

References:

AskFSIS: http://askfsis.custhelp.com/app/answers/detail/a_id/1884/~/adequate-support-for-the-intended-use-of-beef-primal-and-subprimal-cuts

Public Health Significance:

Since 2008, USDA Food Safety and Inspection Service (FSIS) has noted at least five foodborne illness investigations that involve retail establishments grinding beef that was not intended for grinding. Four of these investigations include illnesses due to *E. coli* O157:H7, while one involved *Salmonella typhimurium* infections. In at least one case, although the intended use was communicated to the retail facility by means of a description on the product invoice, it is unknown whether the store personnel conducting the grinding were aware of the intended use designation or understood the risks and impact associated with producing ground beef from products not intended for grinding.

FSIS has declared Shiga toxin-producing E-coli (STEC) an adulterant only in raw non-intact beef and raw intact beef intended for non-intact use, and as a result, establishments apply more stringent process controls for STEC in beef source materials for non-intact use. Large establishments typically verify these controls through robust lot-by-lot microbiological testing of ground beef source materials. FSIS inspectors also perform specific inspection tasks to verify the establishment's STEC controls.

These additional food safety measures help to mitigate the public health risk of raw non-intact beef to consumers. As a result, when product that was intended for intact beef use ends up as source material in raw non-intact beef products at retail, the food safety measures are undermined. Beef product intended for raw intact beef use typically does not have the benefit of routine FSIS sampling or stringent process controls applied by establishments to control STEC.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting that the 2013 FDA Food Code be amended as follows (new language underlined):

3-201.11 Compliance with Food Law

(F) WHOLE-MUSCLE INTACT BEEF that is, further processed in a FOOD ESTABLISHMENT and provided information stating that WHOLE-MUSCLE INTACT BEEF are intended for intact use only or not intended for non-intact use, shall be prepared so that it remains INTACT.

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