



## Adequate Support for the Intended Use of Beef Primal and Subprimal Cuts

Published 02/07/2014 08:37 AM | Updated 12/05/2019 03:51 PM

How can an establishment adequately support that the primal and subprimal cuts' intended use is for raw intact product and, as a result, would not be sampled as beef manufacturing trimmings or bench trim?

[FSIS Home](#) | [USDA.gov](#) | [FoodSafety.gov](#) | [USA.gov](#) | [Whitehouse.gov](#) | [Site Map](#) | [Policies & Links](#) | [Significant Guidance](#) | [FOIA](#) | [Accessibility Statement](#) | [Privacy Policy](#) | [Non-Discrimination Statement](#) | [Civil Rights](#) | [No FEAR](#) | [Information Quality](#)

In order to fully support the primal and subprimal cuts' intended use is for raw intact product, the establishment should identify establishment controls, along with supportable evidence, that ensure the primal and subprimal cuts are used as intended ([FSIS Directive 10,010.1](#), Section I.A.9.). On-going verification, at a frequency sufficient to be credible, that the receiving establishment or facility is using the product as intended need to be part of the supportable evidence. Establishments do not need to conduct lot-by-lot verification that their controls are effective to adequately support their assertion that primal and subprimal cuts are used as intended for raw intact product.

Some acceptable ways that the establishment can support that primal and subprimal cuts are intended for raw intact product include:

- The establishment communicates the intended use to the receiving establishment or facility by making the letter of intended use available on the producing establishment's company website and references the letter of intended use on bills of lading.
- The establishment receives letters of guarantee showing that all product is used in raw intact product only and maintains on-going communication with the receiving establishment or facility to verify that all its product is being processed as raw intact product only.
- The establishment has a contractual agreement with the receiving establishment or facility so the producing establishment has knowledge of the receiving establishment or facility's production process.

Some examples of when the primal and subprimal cuts' intended use is unclear include:

- An establishment that identifies that the product is intended for use in raw intact products in its hazard analysis, but does not have any controls and supportable evidence that demonstrate the product is used as intended.
- A producing establishment that maintains a letter from the receiving establishment or facility that says the receiving establishment or facility only produces raw intact product, without the producing establishment gathering additional information to verify that all product is only used in raw intact product on an on-going basis.
- An establishment identifies the product's intended use for raw intact products and ships the product through a broker or to retail but does not have controls to ensure product is used as intended and does not have supporting documentation showing the product is used as intended.
- An establishment makes the letter of intended use available on the producing establishment's company website but does not maintain on-going communication with the receiving establishments or facilities to ensure they are aware of the letter.

It is the establishment's responsibility to maintain sufficient supporting documentation that the primal and subprimal cuts in question are used as intended for raw intact product only. If the establishment cannot adequately support its assertion that primals and subprimal cuts are used as intended for raw intact products, FSIS will collect the sample.