

**Conference for Food Protection
2020 Issue Form**

Issue: 2020 III-015

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:

Committee to Update CFP Guidance on Beef Ground at Retail

Issue you would like the Conference to consider:

This Issue proposes creating a committee to update the "Guidance Document for the Production of Raw Ground Beef at Various Types of Retail Food Establishments."¹ Outbreaks continue to be associated with beef ground at retail that was not intended for grinding (e.g., trim from intact steaks or roasts, and "pull backs"). In addition, FSIS surveillance has shown that 54%² of retailers have no records associated with beef grinding in violation of 9 CFR 320.1(b)(4).³ These records help facilitate traceback in outbreak investigations and may be used to recall potentially injurious products from commerce. CFP's current guidance does not address intended use or the new grinding records requirement. Updating the guidance document would help increase awareness of record-keeping requirements and promote the adoption of safe grinding practices to help prevent illness from raw beef ground at retail food establishments.

Public Health Significance:

Shiga toxin-producing *Escherichia coli* (STEC) is estimated to cause 265,000 illnesses in the US annually, including 3,600 hospitalizations and 30 deaths.⁴ Outbreaks continue to be associated with beef ground at retail that was not intended for grinding (e.g., trim from intact steaks or roasts, and "pull backs"). In many outbreak investigations, inadequate grinding records and insufficient sanitation between source lots at retail have hindered investigators' ability to determine the ultimate source of the implicated beef.

CFP developed the "Guidance Document for the Production of Raw Ground Beef at Various Types of Retail Food Establishments"¹ (2012 I-014) to share best practices for grinding beef, including a record keeping template. In 2015, FSIS issued the "Records to be Kept by Official Establishments and Retail Stores that Grind Raw Beef Products" rule.⁵ The rule requires grinders to maintain records on supplier names, establishment numbers, lot numbers, and production dates of the raw beef components used to make ground beef products (9 CFR 320.1(b)(4)³). Since CFP published the guidance and FSIS finalized the

grinding records requirement, there have been three outbreaks associated with food establishments grinding beef that was not intended for non-intact use.

As presented at the CFP Pre-meeting Workshop in 2018,⁶ federally inspected meat processing plants that produce beef, identify the products' "intended use." Two common intended uses are: "intact" such as steak and roasts, or "non-intact" such as ground or mechanically tenderized beef.^{7,8} Intact steaks may be considered a ready-to-eat food by searing without being fully cooked because contamination with pathogenic bacteria would only occur on the surface of the product (Food Code (§3- 401.11(C)(3)).⁹ However, grinding causes STEC to move to the interior of the beef, which may increase risk of foodborne illness if consumed undercooked (e.g., rare or medium rare). For this reason, meat processing plants implement more stringent process controls for beef intended for non-intact use.⁸

Per FSIS routine ground beef sampling¹⁰, 83% (248/298) of retail food establishments reported grinding individually vacuum packaged whole muscle beef (a product intended for intact use). Retail food establishments can reduce risk of STEC when grinding raw beef by: (1) applying antimicrobial intervention to the beef intended for intact use before grinding, or (2) purchasing beef intended for non-intact use.^{6,8} However, of the 248 retail food establishments who ground vacuum packaged beef, only 21 (8%) implemented additional food safety steps to eliminate STEC before grinding.¹⁰

The 2014 CFP guidance¹ does not include information on how the beef source material and its intended use affects food safety. Additionally, the CFP guidance document does not mention that retailers are required to keep grinding records since it was developed prior to the issuance of the Grinding Record Keeping Rule.

References (noted above with superscript numerals)

1. Guidance Document for the Production of Raw Ground Beef at Various Types of Retail Food Establishments. URL: <http://www.foodprotect.org/media/guide/CFP%20Beef%20Grinding%20Log%20Template%20Guidance%20Document%20-%208-8-2014.pdf>
2. USDA-FSIS Enforcement Records: October 1, 2016 - September 30, 2019
3. 9 CFR 320.1(b)(4) - URL: https://gov.ecfr.io/cgi-bin/text-idx?SID=64ec97c3205d4b15340b3577e35c22d5&mc=true&node=se9.2.320_11&rgn=div8
4. Scallan E, Hoekstra RM, Angulo FJ, Tauxe RV, Widdowson MA, Roy SL, et al. Foodborne illness acquired in the United States---major pathogens. *Emerg Infect Dis* 2011;
5. 80 FR 79231, Records to be Kept by Official Establishments and Retail Stores That Grind Raw Beef Products. URL: <https://www.fsis.usda.gov/wps/wcm/connect/6bb824d5-70ce-4c1d-8801-b18346fa595c/2009-0011F.pdf?MOD=AJPERES>
6. Sherri (Jenkins) Williams. *Intended Use of Non-Intact Products*. Pre-Meeting Workshop, Conference for Food Protection (CFP) 2018. Richmond, VA. (slides attached)

7. 2017 Food Code Section 1-201.10(B) Terms Defined "Intact Meat" and "Meat". URL: <https://www.fda.gov/media/110822/download>.
8. FSIS Compliance Guideline for Minimizing the Risk of Shiga Toxin-Producing *Escherichia coli* (STEC) in Raw Beef (including Veal) Processing Operations. URL: <https://www.fsis.usda.gov/wps/wcm/connect/c1217185-1841-4a29-9e7f-8da6dc26d92c/Compliance-Guideline-STEC-Beef-Processing.pdf?MOD=AJPERES>.
9. 2017 Food Code §3- 401.11(C)(3). URL: <https://www.fda.gov/media/110822/download>
10. FSIS Directive 8010.1 Methodology for Conducting In-Commerce Surveillance Activities. URL: <https://www.fsis.usda.gov/wps/wcm/connect/66a3ae47-3a55-426e-8bab-ea7b2175c9be/8010.1.pdf?MOD=AJPERES>

Recommended Solution: The Conference recommends...:

The Conference recommends that a Committee be convened of members from all constituencies in the CFP. The Committee will be charged with:

1. Reviewing the available guidance and recommend changes to update and address continuing issues, such as:
 1. Low compliance with grinding records requirements,
 2. Grinding beef intended for intact use,
 3. Lack of sanitation (including records of sanitation) throughout the production day, and
 4. What to do if inadequate grinding records are found
2. Determining appropriate mechanisms for sharing the committee's work,
3. Reporting the committee's findings and recommendations to the 2022 Biennial Meeting of the CFP.

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Supporting Attachments:

- "CFP Presentation on Intended use of Non-Intact Products"

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.

WORLD'S LEADING ANIMAL PROTEIN PRODUCER



Intended Use of Non-Intact Products

CFP April 16, 2018

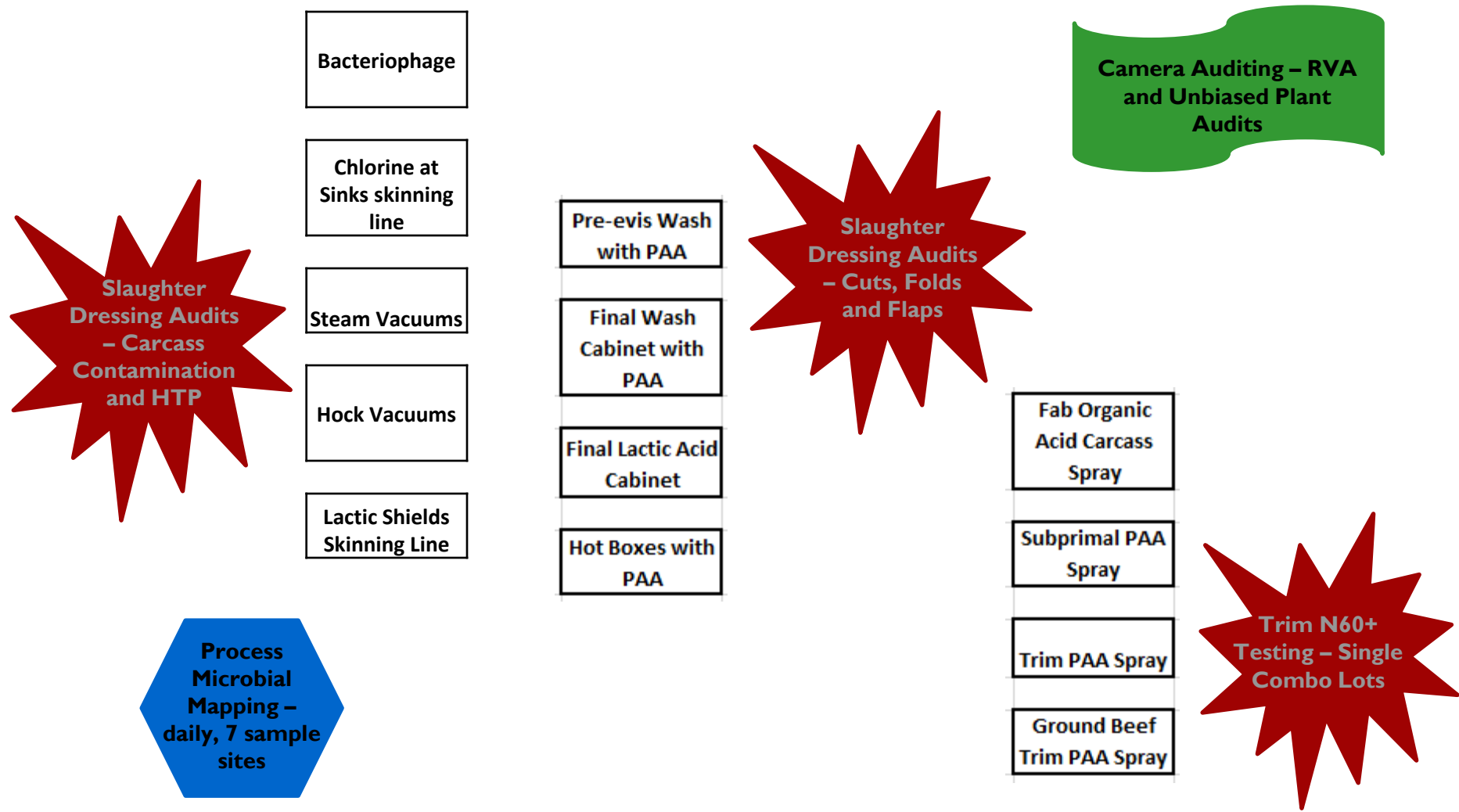
Sherri Jenkins, JBS USA Food Company

WHAT DOES A PACKER DO?



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JBS Beef Food Safety Intervention System



What do interventions look like?



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Why are different interventions utilized?

- ❑ Multiple hurdle approach – stacking different types of antimicrobial solutions or systems throughout the production process to make it difficult for microorganisms to survive the process.
 - Types of interventions – thermal, pH, chilling, combinations

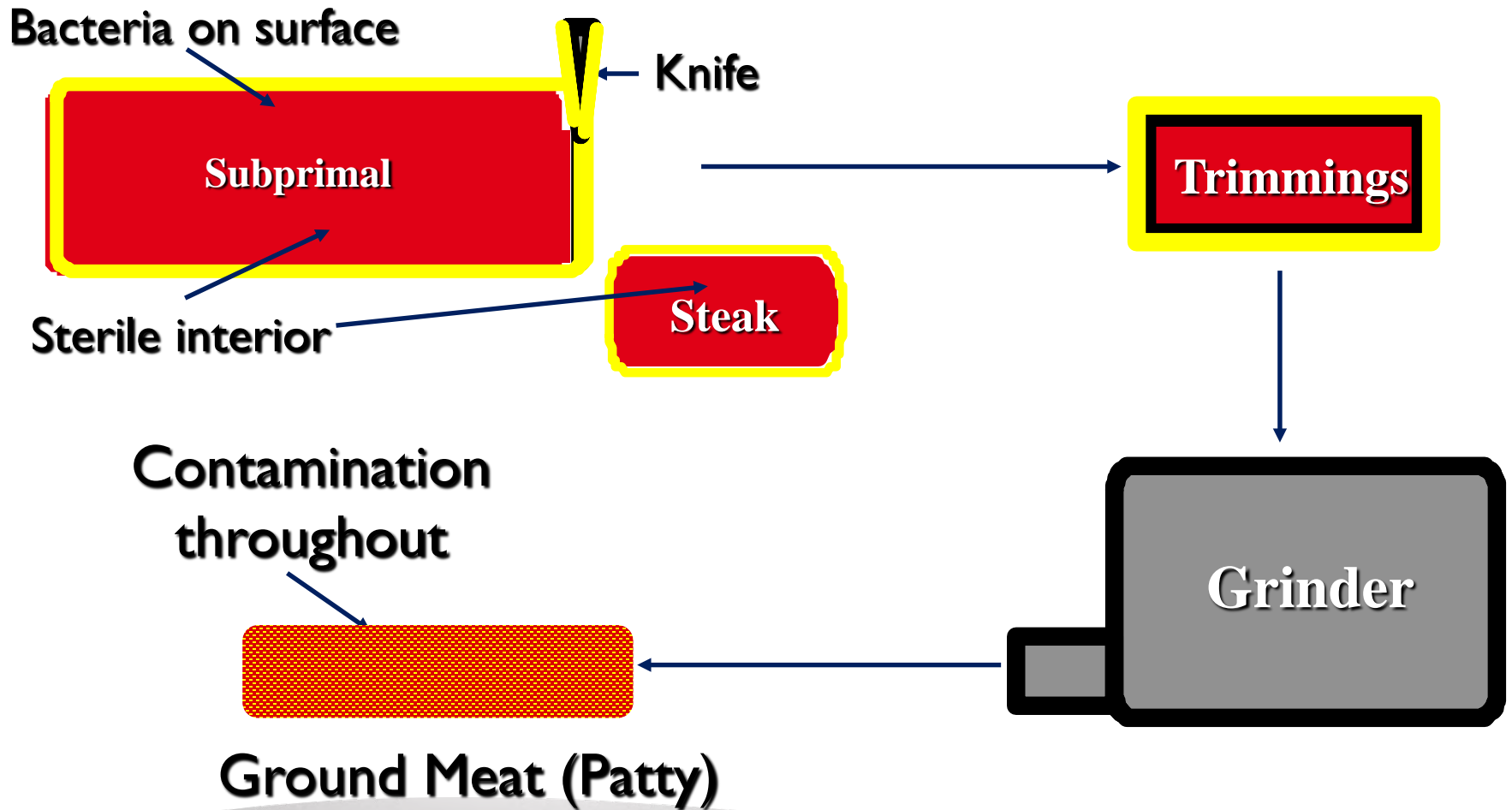


What is a 'non-intact' product?

- ❑ FSIS Directive 10,010.1, Revision 4
 - Raw, non-intact product – i.e., ground, mechanically tenderized, needled, and vacuum marinated.



Why is non-intact different?



Non-intact or Intact Product



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HACCP and Non-intact Products

- ❑ Hazard analysis – addresses the likelihood of occurrence for pathogens.
- ❑ Antimicrobial interventions to reduce potential contamination may be applied as a processing aid or as a CCP prior to producing non-intact products.



Why is intended use important?

- ❑ What does JBS intend to be for non-intact versus intact products?
 - Intact – any vacuum packaged product(s) whether in a box or a combo.
 - Non-intact – naked (not vacuum packaged) product(s) in a box or a combo.
- ❑ What happens when customers use the product for non-intact when it was not intended for that use?
 - The 'lot' is unknown and not able to be controlled.



Lotting and Testing product destined for ground beef

- ❑ Beef trimmings are destined to be raw, ground beef; therefore, they are **ALL** tested.
- ❑ Lots are typically 1 combo up to 5 combos.
- ❑ Lots should never be divided between use.



Labeling of non-intact

- ❑ On May 18, 2015, FSIS published a final rule that established labeling requirements for raw or partially cooked mechanically tenderized beef products.
- ❑ Does not apply to ground beef, hamburger patties, or beef patties.
- ❑ Does not apply to cubed steaks – visually able to tell it is tenderized.
- ❑ Does not apply to fully cooked products.



Bench Trim

- ❑ Occurs when a processor or retailer utilizes INTACT products to make smaller portions and the TRIM that comes from this process is termed 'bench trim'.

- ❑ Hazards of using Bench Trim –
 - Multiple suppliers with different food safety systems.
 - The lot of the product is unknown and therefore not able to be controlled.

Bench Trim

- ❑ If the processor is an FSIS inspected establishment, this process **MUST** be addressed in their HACCP plan.
 - Supplier approval program
 - Apply an antimicrobial intervention
 - Lot and test the bench trim





Questions?

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