

**Conference for Food Protection
2020 Issue Form**

Issue: 2020 III-016

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:

Creation of a Committee: Intended use STEC hazards in retail environment

Issue you would like the Conference to consider:

Retail food establishments with in house grinding operations are commonly not aware of the potential presence of Shiga Toxin-producing E. coli (STEC) associated with beef cuts that are intended for intact use. It is a very common practice for firms to use intact meats "intended for intact use", including boxed primal cuts or in-house generated 'bench trim' from the processing of primal and/or subprimal to make non-intact finished products such as ground beef. This practice exposes consumers to STEC hazards that are controlled at the primary processing facility. The inclusion of controls and education in the retail business environment will reduce the incidence of STEC illnesses and mitigate the liability firms unwittingly assume when violating the Intended Use policy.

Public Health Significance:

STEC may cause illness of varying severity from diarrhea (often bloody) and abdominal cramps to, rarely, kidney disorders. In some instances, the toxin produced by the organism can bind to tissues in the kidneys and cause hemolytic uremic syndrome (HUS), leading to kidney failure and death. Cattle have been identified as a reservoir for pathogens including STEC. The intestinal tract, mouth, hide, and hooves of cattle can contain these pathogens. Contamination can be transferred to the carcass during the slaughter process. Slaughter establishments typically employ a variety controls to prevent, eliminate or reduce these pathogens during the slaughter process. USDA policies do not consider the presence of STEC to be an adulterant in beef products that are intended for intact consumer use, but often these beef products are used at retail establishments to manufacture non-intact products. This practice is common in the retail food industry and often conducted without the firm being aware of the need for controls as evidenced by historically common frequency of outbreaks.

Recommended Solution: The Conference recommends...:

That a Committee for the Evaluation of Intended Use Hazards during Retail Meat Processing be created. This committee should include members of all constituencies in the CFP, including USDA personnel. The committee will be charged with:

1. Implement a variance with HACCP based controls requirement in the model food code for firms using Intact Intended Use meats to manufacture non-intact products. Elements of the variance must include:

A.) Pre-requisite program including supplier guarantee for beef products intended for non-intact products,

B.) Control measures related to STEC Reduction, specifically, methods to reduce STEC on the meat surface to below a detectable level before non-intact processing, such as an antimicrobial intervention, another lethality treatment, or treat or wash the product and trim the entire outer surface,

C.) Supporting recordkeeping, monitoring, and verification.

D.) Establishments must properly design and fully validate the method used to reduce STEC to below detectable levels. This is necessary to address the activity of retail establishments using primal and/or subprimal meats or bench trim from meats that are "intended for intact use" to make non-intact products, such as ground beef.

2.) Edit and revise prior developed 'CFP Beef Grinding Log Template Guidance Document' to include:

A.) Reference to "Intended Use" controls, such as supplier guarantees or certificates of analysis,

B.) STEC hazard controls and industry best practices as modeled by USDA inspected facilities.

3.) Develop educational materials to support grinding log assessment by facility management and state / local regulatory authorities, including:

A.) Educational fact sheets detailing STEC hazards represented by the non-intact handling of beef intended for whole intact use for public distribution,

B.) Inclusion of supporting information into the model food code Annex

4.) Determining appropriate methods of sharing the committee's work, such as:

A.) Posting to state and local health department websites or resource libraries,

B.) Incorporating into CFP training programs, posting to the CFP website, and

C.) Sending a letter to the FDA requesting that the Food Code, Annex be amended by adding references to the amended guidance document as well as any existing guidance documents that the committee recommends.

5.) Sending a letter to the USDA requesting that inspected facilities improve the critical control point of communication as related to the "Intended Use" policy to downstream customers.

6.) Reporting the committee's findings and recommendations to the 2022 Biennial Meeting of the Conference for Food Protection.

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Supporting Attachments:

- "USDA AskFSIS website detailing gaps in current notifications of hazards"
- "1999 Federal Register"
- "FSIS Compliance guideline for minimizing STEC in raw beef"
- "CFP Guidance document for the production of raw ground beef at retail"

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.