



# Conference for Food Protection

## Guidance Document for the Production of Raw Ground Beef at Various Types of Retail Food Establishments

Council 1 of the Conference for Food Protection (CFP) formed the Beef Grinding Log Committee with the directive to:

- a) Review the United States Department of Agriculture, Food Safety Inspection Service's (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 food establishments;
- b) Provide recommendations for supplier provided labels to accomplish record keeping within retail food establishments; and
- c) Report back to 2014 Biennial Meeting.

The CFP Beef Grinding Log Committee recommended that this information be placed on the CFP website for use as a guidance document. This document contains a recommended set of practices and procedures for the production of raw ground beef at various types of retail food establishments.

The Committee reviewed the current United States Department of Agriculture, Food Safety Inspection Service's (USDA/FSIS) guidance and proposed the following templates and instructions, best practices, and guidelines for beef grinding practices at retail:

**Beef Grinding Log Template** - The *Sample Ground Meat Record for Retail Establishments* on page three shows the committee's conclusion of the minimum data points necessary on a beef grinding record log to successfully conduct a complete product traceback and recall. The basic components are:

- Production Date;
- Name of Source Product Ground (Trim, Chub, "Pull backs", etc.);
- Supplier Packed Date or Use by Date;
- Establishment number of supplier;
- Lot Number from supplier;
- Retail label or menu description;
- Quantity in lbs. of product being ground;
- Time grinder cleaned and sanitized; and
- Verification sign-off

Note: It is very important that each product ground be recorded on the template in sequential order for traceability purposes.

When feasible, the Committee highly encourages all retailers to adopt electronic recordkeeping along with scan technology to collect and maintain this important data as we feel scan technology will be more accurate and timely in the event of a “trace back”. We also recognize that smaller retailers will be challenged with financial and human resources to move to this standard today. In either event, being able to quickly provide accurate data is the requirement.

**Production Logs** - A Beef Grinding Log may be used in conjunction with a company’s beef production log (or cutting list) log. Production logs are used by retailers to project and produce specific types and amounts of steaks and roasts needed in a production cycle. A fall-out benefit of production logs is that they collect the source material of any bench trim that may have been produced by the retailer while fabricating steaks and roasts for the refrigerated display case. For those retailers grinding bench trim, this becomes the easiest way to collect the necessary data. Production logs or cutting lists will need to contain the supplier establishment number, manufacturer’s name of the primal, and pack date and lot number of the primal. (Note: Beef packers will reuse lot numbers. However, documenting *both* the lot number and pack date or use by date for a source material would make the lot number generally unique.) Retailers will then need to file together both the production log and grind log for record keeping. The *Sample Primal Production Log for Retail Food Establishments* on page three shows the pertinent information that must be tracked on a production log if an establishment is grinding in-store produced bench trim and/or pull back material.

Except for those records that relate to in-store ground products that are under current investigation or could be considered a possible cause of illness, completed grinding and production logs need to be maintained for a minimum of 90 days. All such records should be accessible within 24 hours but do not have to be maintained on-site.

## Sample Templates:

### Template 1 Sample Ground Meat Record for Retail Food Establishments

Retail Establishment Name: Store #55

Retail Establishment Production Date: 8/9/2013

| Name of Source Product Ground<br><br>(Trim, chub, cut, pull-back, bench trim, etc.) | Source Material Pack Date or Use by Date<br><br>(From Supplier Label) | Establishment Number of Supplier | Lot Number of Product from Supplier | Retail Name<br><br>(Name of Product on Retail Label or Menu) | Quantity Ground<br><br>(in batch) | Time Equipment Cleaned & Sanitized<br><br>(Either Before or After Batch) | Associate Initials |
|---|---|----------------------------------|-------------------------------------|--|-----------------------------------|--|--------------------|
| BEEF<br>COARSE<br>GROUND<br>73/27   | 7/18/2013   | M354                             | 771007180001                        | GROUND<br>BEEF   | 30 LBS                            | 7:13 AM  | JTM                |

#### Sample Ground Meat Record for Retail Food Establishments - Use Instructions

This document has eight columns titled: Name of Source Product Ground; Source Material Pack Date or Use by Date/Pull Backs Included (Yes/No)?; Establishment Number of Supplier; Lot Number of Product from Supplier; Retail Name; Quantity Ground; Time Equipment Cleaned & Sanitized, and Associate Initials The first four columns relate directly to the source material. The last four columns are food establishment functions.

This form will allow every ground product produced in food establishments to be associated to the day it was produced (as internally correlated to each establishment's sell-by date on the label, etc.). However, if an establishment is grinding in-store produced bench trim and/or pull back material, then a production log (in addition to the beef grinding log) will need to be maintained to correlate the sources of the bench trim and/or pull back material.

## Template 2 Sample Primal Production Log for Retail Food Establishments\*

| Store Location: Store #55                |                      |                 | Production Date: 8/8/2013 |           |
|--|----------------------|-----------------|---------------------------|-----------|
| Primal Product Name as Listed on the Box | Vendor/Supplier Name | Establishment # | Lot Number                | Pack Date |
| BEEF KNUCKLE                             | Swift                | 3D              | 7846515                   | 7/24/2013 |
|  |                      |                 |                           |           |
|  |                      |                 |                           |           |
|  |                      |                 |                           |           |
|  |                      |                 |                           |           |
|  |                      |                 |                           |           |

\*Note: This sample production log is being provided as an example to visually provide the pertinent information that must be tracked (in addition to a beef grinding log) if an establishment is grinding in-store produced bench trim and/or pull back material. This document must not be misconstrued to prohibit an establishment from keeping this information in a different manner or format.

**The example shows the data points needed in tracking ground beef production from trim, which are...**

- **Retail Establishment Name**
- **Date of Production**
- **Common Name of Primal**
- **Supplier Name**
- **Establishment Number of Beef Supplier**
- **Lot Number of Primal**
- **Pack Date of Primal**

### **Best Practices for Grinding Beef at Retail**

Using sanitation standard operating procedures (SSOPs) to address the cleaning of food contact surfaces, equipment, utensils, implements, and the processing areas is a best practice. The SSOPs should specify how frequently everything will be cleaned and include a verification procedure for the process.

Furthermore, it is a best practice that each retailer also is able to convey to the USDA/FSIS their standard operating procedures (SOP's) for grinding product. Examples include policies and procedures regarding product sources, product dating, and the firm's meat handling/rework policies. All these factors will be necessary and useful in determining the extent of a product recall.

## **Employee Training and Employee Health and Hygiene**

Proper training of all employees with access to the meat case, packaging area, and grinding areas is essential. Only properly trained employees should be allowed to work in the meat department, handle meat, and operate equipment.

The Food Code and/or local and state regulations have guidelines for employee health and hygiene including illness procedures, and policies for hand washing, proper clothing, coverings, hair restraints, gloves, etc. Make sure all local regulations are followed by all retail employees.

Retailers should develop effective training procedures for the employees responsible for collecting; recording, and maintaining grind log data during their daily job duties. The best training programs utilize a “tell, show, allow practice/observe and praise/correct” component. Employees should understand the importance of the entire scope and need for the work.

## **Cleaning and Sanitation of Equipment**

Section 4-602.11 of the FDA Food Code states that all food contact surfaces should be cleaned at least every four hours. The food code provides for cleaning less frequently than every four hours if the utensils and equipment are held in a refrigerated room and cleaned according to the frequencies provided in the food code.

## **Importance of “Breaks” in the production cycle**

Breaks in the production cycle are critical and should not be overlooked. **A break in the production cycle is a combination of a complete cleaning and sanitation step in conjunction with no carryover of product.** *This can be the difference between needing to recall product from one day or from several months.* Therefore, documenting cleaning and sanitation is very important.

## **Significance of avoiding carryover of trim**

Avoid mixing product ground on one day with product made on subsequent days. If product is carried over from one day to the next, the two days of production are now linked even if the equipment is cleaned. Therefore, if this practice is done day after day and there is no break in production, the entire product becomes one huge lot. This can lead to rolling recalls and there are many examples in the meat industry of months of product being recalled because of carry-over and no breaks in production. On the other hand, there are also examples of very small recalls because the retailer utilized clean breaks in production and maintained appropriate processing and cleaning records.

## **Pull-Backs**

“Pull-backs” are retail packaged cuts, such as steaks or roasts, removed from the self-service refrigerated display cases and either reworked into smaller cuts, such as stew beef or cube steak, or ground product. “Pull-backs” can be ground separately but are normally co-mingled with in-store produced bench trim.

The determining factors for pulling and reworking a steak or roast vary greatly. An operator may or may not use the company's "sell-by" date on the retail cut to determine "pull-back". At times quality issues such as the visual appearance of the steak (trim standard, marbling, excessive bone per internal standards, loss of bloom, or eye appeal) will create the need to pull back a specific cut. Optionally, an operator may cut multiple roasts expecting to leave them for no more than one day and re-cut them the following day into steaks. There are many possible-determining factors for the timing or number of "pull-backs" on any one-day.

Large and small operators may use "pull backs" as part of normal Standard Operation Procedure (SOP). While this practice may present additional risks (temperature fluctuation of product and public handling of the packaged product) with proper food handling processes currently there is no known food safety risk.

To provide information necessary trace back, information such as source material, establishment numbers, pack date, lot code, etc. must be captured for "pull-backs" from the previous days' production (primal usage) logs. A retail operator utilizing "pull backs" would, therefore, be able to provide production logs from several proceeding days in the event of a trace back or recall of a particular batch of grinds. Retail operators will be required to establish, follow, and articulate internal SOPs related to the "pull back" process to FSIS in the event of a trace back recall process.

When a batch of ground beef contains "pull-back" product, the retail operator will indicate this on the grinding log under the "Source Product Ground" column of the Beef Grinding Log Template (see Appendix 1). The "Retail Label, Quantity Ground, and Time Equipment Cleaned Sanitized" blocks will be completed per normal procedures.

Note: Trace back becomes increasingly difficult when a retailer purchases from multiple suppliers. Trace back will become even more difficult when a retailer opts to do "pull backs" as the amount of data will be multiplied over four or five days of production. Having multiple possible sources of product will make pinpointing a particular beef supplier extremely challenging.

### **Points to consider**

In the case of outbreak investigations, certain practices make it very difficult to piece together information and can halt investigations. Examples of these include:

- Product from several suppliers combined in the grinder that is not recorded.
- Trim mixed with other product that is not recorded (for example, bench trim mixed with chubs and not recorded as such).
- Recording the supplier name but having no other identifying information, such as the establishment number which is a true identifier of the processing plant. (Many suppliers have multiple processing plants differentiated only by a different letter after the assigned establishment number.)
- Incomplete or inaccurate forms.
- Carryover without true breaks in the production cycle.

## **Lotting at Retail**

The package produced at retail must be linked to the lot of product from which it was made, i.e., the source product. The simplest way to do this is by placing an identifiable code, product name and date on the product label that links the package to the lot of meat ground for which there is a record. The retail-ground lot should have a supportable definition and should link the packaged product to the source material. Most companies produce multiple types of ground product throughout the day that should be labeled differently. Some companies will make several lots of the same product a day because they clean and sanitize frequently, and some only have one lot per day.

## **Recommended Product Handling Practices**

Store-generated trimmings should be segregated from other products. A full, documented cleaning and sanitizing of the entire grinder is then needed to create a “break” in the production cycle.

When grinding chubs or tubes, start with the highest lean percentage. All lean points will be considered the same “lot” unless the retailer completes a full cleaning and sanitizing between the lean points.

- **Rotate supply first-in first-out and pay attention to sell-by dates.**
- **Avoid mixing species unless intentional and clearly labeled. Clean and sanitize equipment between species.**
- **Store trim in clean and sanitized lugs and hold under refrigeration.**
- **Properly label all trim lugs with the primal source, date, time and employee.**
- **Avoid mixing products from different suppliers.**
- **Avoid mixing chubs and trim.**
- **Minimize grinding re-work or pull-backs (if they are ground, make sure they are clearly documented in the records).**

## **Recommendations for Beef Suppliers**

The CFP Beef Grinding Log Committee supports global traceability efforts such as adoption of the voluntary GS1 mpXML guidelines to standardize the information contained within barcodes. Furthermore, the Committee also recognizes that human readable data is also required in these efforts to allow collection of data by small retailers who may not have access to the bar scan readers of larger retailers.

Collecting data by hand is difficult, costly and subject to human error. The CFP – Grinding Log Committee recommends that the beef suppliers attach a sufficient number of “peel off” labels containing the needed trace back data either in the boxed beef or attached to the outside of the box. These “peel off” labels would be required on all primal-boxed beef as well as chubs or tubes.

A smart phone application or other system could be developed by each beef producer for deciphering the information contained within the barcodes that are currently applied to their products. This would make the information readily available for the grocer to

use. The application could also be used to collect and store the above needed data points in a web application. The ability to download this phone application would be given to any buyer of the establishment's meat products.

Note: We want to acknowledge and thank FMI for allowing sections of their report titled, "*Comprehensive Guide Meat Ground at Retail Recordkeeping and Sanitation - June 2013*" to be utilized in this report.



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