

FSIS REPORT
CFP MEETING, APRIL 2005, COLUMBUS, OHIO

A. Memorandum of Understanding between the Conference for Food Protection and the USDA/Food Safety and Inspection Service

At the CFP meeting in August 2004, CFP Executive Director suggested to Phil Derfler, FSIS Assistant Administrator, a Memorandum of Understanding (MOU) between the CFP and FSIS. The drafted MOU has the same wording as the one with FDA except for the change in commodity to meat, poultry and egg products, updated references, and Liaison Officer designations. It was sent to and approved by the CFP Executive Board in December 2004. It was signed by FSIS Acting Administrator Dr. Barbara Masters and sent to Larry Eils, chair of the Constitution and By-Laws Committee for submission as an issue in the 2006 CFP meeting.

B. Survey of Production volume Information and other Information

In September 2004, FSIS started conducting a survey of official establishments producing post-lethality exposed meat and poultry products. The FSIS Survey Form 10,240-1 was sent to establishments (Notice 9/22/04) to collect data on production volume, controls used by the establishment vs. LM in the post-lethality processing environment, such as the use of post-lethality treatment, antimicrobial agent or sanitation controls.

In the FSIS Listeria Interim Rule (FR June 2003), FSIS stated that it will collect production volume and other information from official establishments producing post-lethality exposed RTE meat and poultry products. The information gathered will be used by FSIS in its verification sampling of these establishments based on risk for *Listeria* and controls used by the establishments.

The Notice and the form are available at:
www.fsis.usda.gov/oppde/rdad/fsisnotices/49-04.pdf

C. Risk Based Verification for the *Listeria* Rule

FSIS started Phase 1 of its risk-based verification program for the *Listeria* rule in January 2005. Risk-based verification provides FSIS with confidence in an establishment's food safety system so that FSIS can focus on establishments with less effective control measures to prevent adulteration of the product. As the term denotes, sampling of RTE products by FSIS will depend on the relative risk of the product for *Listeria monocytogenes*. The information that FSIS collected in the survey 10,240-1 was used in determining the relative risk of RTE products through the controls used by the establishments. RTE products with higher risk will be sampled at a higher rate than those with lower risk. For

example hotdog products that are subjected to a post-lethality treatment and/or antimicrobial agent will be sampled less than those with no treatment at all.

Details of the Notice can be found in:

www.fsis.usda.gov/regulations/notice_61-04/index.asp

D. New Time and Temperature Tables for Cooking Poultry

FSIS Notice 16-05 (3/2/2005) announced the availability of new time and temperature guidance for cooking chicken and turkey. In Appendix A of the 1999 final rule for cooking roast beef, corned beef, cooked beef and cooked chicken, FSIS had only one temperature guidance, 160° F, to cook poultry in order to achieve the performance standard of 7 log reduction of Salmonella. A thermal inactivation study lead by ARS was used by FSIS to derive new time and temperature tables for cooking chicken and poultry to achieve the performance standard. These new times and temperatures are recommended especially for cooking poultry at temperatures below 160° F. Establishments that have been using the 160° F instantaneous cooking temperatures can continue using this temperature for cooking poultry and should be conducting on-going verification to confirm that the process is being effectively controlled.

The FSIS Notice and the new time-temperature tables can be found in:

www.fsis.usda.gov/oppde/rdad/fsisnotices/16-05.pdf

www.fsis.usda.gov/oppde/rdad/fsisnotices/rte_poultry_tables.pdf

E. Jerky Guidelines

The Jerky guidelines were developed to provide guidance to small and very small establishments in the safe manufacture of jerky. It includes measures that these establishments can use to achieve adequate lethality. In the fall of 2003, FSIS became aware that producers of meat and poultry jerky may not be adequately processing jerky to achieve lethality. Pathogens of concern in jerky processing include *Salmonella*, *Staphylococcus aureus*, *Listeria monocytogenes*, and *E. coli* O157:H7. The guidelines include measures to process the product with adequate humidity to eliminate the pathogens. The guidelines also recommended using water activity as a measure of adequate drying process to produce a shelf stable product. Jerky products must not rely only on the MPR of the product (a standard of identity for jerky and other dried products) to determine adequacy of the process and shelf stability. Together with the guidelines, FSIS issued a modified Generic HACCP Model for ready-to-eat, shelf stable meat and poultry products.

The new guidelines and generic HACCP model can be found in:

www.fsis.usda.gov/oppde/rdad/fsisnotices/02-05.pdf

www.fsis.usda.gov/PDF/Compliance_Guideline_Jerky.pdf

F. Two FSIS Risk Assessments

FSIS held a public meeting in March 2005 to present two FSIS risk assessments, one for *Salmonella* in RTE meat and poultry products, and one for *C. perfringens* in RTE and partially cooked meat and poultry products. FSIS published (FR Feb. 2001) the proposed rule “Performance Standards for the Production of Processed Meat and Poultry Products” that would achieve a specified level of lethality in RTE meat and poultry products. FSIS conducted these risk assessments to address risk management questions that will inform risk managers in finalizing the proposed rule. The control of LM was included in the proposed rule. A final interim rule for the control of Lm was published in the FR June 2003.

1. Risk Assessment of the Impact of Lethality Standards on Salmonellosis from RTE Meat and Poultry Products

This risk assessment was designed to quantitatively estimate the public health impact of the proposed performance standards and alternative standards on RTE meat and poultry products (cooked, fermented, dried and salt-cured products. Estimates of public health impact included the following factors: lethality, compliance level, thermal process safety factor, storage and growth, and reheating.

The public health impact of the following lethality/performance standards for *Salmonella* in cooked, fermented, salt-cured and dried RTE meat and poultry products were estimated:

- a) 6.5 log reduction for meat products, 7.0 log reduction for poultry products
- b) 5.0 log reduction for meat and poultry products
- c) split 6.5/7.0 log reduction for cooked products, 5.0 log reduction for fermented, salt cured, and dried products

2. Risk Assessment of *Clostridium perfringens* in RTE and Partially Cooked Meat and Poultry Products

This risk assessment was conducted to a) evaluate the public health impact of changing the allowed growth of *C. perfringens* during stabilization (cooling after the cooking step) of RTE and partially cooked meat and poultry products; b) examine whether limiting the growth of *C. perfringens* in RTE meat and poultry products would be adequate in protecting against the growth of *C. botulinum*. The public health impact of allowing the following log growth of *C. perfringens* during stabilization was estimated: 1.0 log, 2.0 log, and 3.0 log.

The risk assessment estimated the predicted *C. perfringens* foodborne illness (approximate) caused by different causes as follows:

- 93 %- due to improper cold storage of RTE and partially cooked meat and poultry products at retail and at home
- 4.0 %- due to improper hot-holding of RTE and partially cooked meat and poultry products

0.07 % - if 1 log growth allowed during cooling in processing plants
0.30 % - if 2 log growth allowed during cooling in processing plant

The risk assessment found that any measures taken to reduce or prevent *C. perfringens* growth will not necessarily have the same effects on growth of *C. botulinum*. The growth rate of *C. botulinum* was observed to be higher at low temps in lab experiments and it probably grows at temperatures below the minimum temperature for *C. perfringens* growth.

The risk assessments can be found in:

www.fsis.usda.gov/news_&_events/NR_031505_03/index.asp

www.fsis.usda.gov/Science/Risk_Assessments/index.asp

G. FSIS New Food Security Checklist for Industry

FSIS unveiled the industry self-assessment checklist for food security on Friday, January 28. The voluntary "Industry Self-Assessment Checklist for Food Security," provides plants with a constructive way to evaluate their security plans to prevent intentional contamination of their products, thus ensuring the safety and well being of millions of consumers world wide.

The checklist contains questions covering the following important areas: Food Security Plan Management, Outside Security, Inside Security, Slaughter and Processing Security, Storage Security, Shipping and Receiving Security, Water and Ice Supply Security, Mail Handling Security, and Personnel Security.

The industry self assessment checklist for food security can be found in:

www.fsis.usda.gov/oppde/rdad/fsisnotices/07-05.pdf

www.fsis.usda.gov/food_security_and_emergency_preparedness/security_guidelines/index.asp