

**Conference for Food Protection
2012 Issue Form**

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Issue: 2012 I-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.

Title:

Addition to Original Containers and Records Section in the FDA Food Code,

Issue you would like the Conference to consider:

The 2009 FDA Food Code recognizes that consumers are at risk of foodborne illness from undercooked or improperly cooked meat items, particularly ground beef. Some retailers may grind intact beef or beef trim to produce ground beef "in house". While this practice is lawful, it may present an increased risk of foodborne illness to consumers, because intact beef may not be subject to the same rigorous pathogen control as ground beef. In addition, mixing of product from various suppliers and lots can spread contamination among the resulting ground product. Failure to adequately separate lots, clean and sterilize grinding equipment can contribute to the risk.

Public Health Significance:

Grinding intact beef "in house" may spread pathogenic contamination from the exterior of an intact product throughout the resulting ground beef, or, may serve as a source of cross-contamination of grinding equipment. Mixing of lots from the same or varied suppliers can spread contamination among resulting product. Outbreaks resulting from these products may be more difficult to trace as a result of the mixed nature of the product. Adequate recordkeeping is thus essential to provide traceback data for public health officials investigating an outbreak.

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA requesting the 2009 Food Code (as modified by the Supplement issued in 2011) be amended as follows (new language shown with underline):

3-203.13 Recordkeeping, Ground Product.

(A) Every FOOD ESTABLISHMENT that performs grinding or packaging of MEAT on PREMISES shall maintain adequate records sufficient to assist public health officials with traceback or other relevant investigation.

(1) Adequate records shall include:

(a) Producing store name, address, city/state/zip

(b) Date of each lot of store ground product produced, where a lot is defined as all identically labeled product produced from full equipment clean-up to clean-up

(c) Exact name/type of store ground product

- (d) Amount of each lot of store ground product
- (e) Sell by/use by date and/or production code of each lot of store ground product
- (f) Other information used to identify store ground product
- (g) Full name(s) and product code(s) of all source products used to formulate each lot of store ground product
- (h) All Federal or State Establishment numbers of each source product contained in each lot of store ground product
- (i) Each source product sell by, use by, or production date/code
- (j) The source firm name, establishment number and use by/sell by/production date/code for all Shop trim/rework used in each lot of store ground product
- (k) Bills of Sale (e.g. sales receipts) reflecting Item numbers for each ground beef product sold to consumers
- (l) Invoice(s) and Bill(s) of lading for source product(s)

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