



## Improving Tracing Procedures for *E. coli* O157:H7 Positive Beef Product

[Docket No. FSIS 2010-0008]

Verbal Comments Submitted by the American Meat Institute

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My name is Scott Goltry and I am Vice President for Food Safety and Inspection Services at the American Meat Institute.

The American Meat Institute was formed in 1906 and our members process more than 90 percent of the nation's beef, pork, lamb, veal, and a majority of the poultry produced in the United States. AMI members continue to adopt food safety practices to produce meat products, which are safe, affordable and available.

During illness-related recalls in the summer of 2008 and again in the summer of 2009, AMI members discussed and shared possible learnings regarding these particular outbreaks that had connections to high event periods. The concepts of abnormal events were reviewed by members. As previously stated in comments to the agency, AMI agrees that each establishment should develop or continue to use process control procedures that are based on findings, corrections, and possible tightened parameters of production or disposition and react appropriately when there are higher than normal positive tests. AMI remains committed that the predetermined number of positive test results to describe a high event period for an establishment, as previously mentioned by FSIS, has no basis.

Instructions in Directive 10,010, Revision 2, to inspection personnel for verification activities of *E. coli* O157:H7 in raw beef products are very specific. Except in the case of high event periods, AMI is unaware if a change to the trace back follow up sample procedure would have a significant improvement to public health. Furthermore, regarding verification sampling, AMI would encourage the agency to review ground beef production practices and sample ground beef products that are routinely produced by the processing facility.

Table one of the handout illustrates the number of ground beef verification samples at federal plants and the necessary follow-up samples taken by the agency. In 2009, there were 35 federal ground beef verification positives that resulted in 492 ground beef and 940 raw ground beef component follow-up samples as a result of these ground beef positives. This means there were 40.9 follow-up samples taken for each ground beef positive. This is an excellent example of the measurable outcome of Directive 10,010.

Last year, FSIS significantly increased the sampling frequency in high volume federal ground beef facilities. Yet this focus on volume-based risk, as well as improvements in testing method detection resulted in a 66% reduction of prevalence from 0.45% in 2008 to 0.3% in 2009.

Production lots sampled by FSIS are typically controlled by the producing company and not released into commerce until the laboratory verifies a negative result. On occasion, the manufacturer will allow the product to enter commerce before the test results are received from FSIS, which would result in a recall. A chart showing the number of recalls due to outbreak illness and those recalls because product was not held pending analysis and had no illnesses is found on table two of the handout.

Additionally, a summary of the amount of federal, import, and retail verification tests of raw ground beef that were not held and resulted in a recall is found on table three of the handout. FSIS has taken under consideration a petition by AMI that the agency implement a system whereby product tested by the agency must be controlled by the company until the result is known. It is our belief that this action is an important part of managing food safety risks as is tracing and should be given equivalent consideration.

On October 14, 2008, the agency requested comments on a Draft Label Policy Guide for N 60 Testing for Boneless Beef Manufacturing Trim. This concept would provide a means to improve tracing especially for boxed beef trimmings that have multiple distributions methods. AMI provided comments to this Guideline and again will be included as part of written comments.

In summary AMI:

- Is unaware of data to support the need to change current policy regarding follow-up sampling and inspection methods except in the case of high event periods.
- Encourages the agency to adopt or support the control of product pending lab analysis;
- Act positively to comments submitted by AMI regarding boneless beef sampling and testing labeling, and lastly;
- Supports representative sampling of ground beef by FSIS.

Thank you for allowing me the opportunity to comment.