TESTING CONCERNS FOR BEEF FURTHER PROCESSORS

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Credit to Dennis Johnson (OFW Law)
Purchasers of Raw Beef

• For establishments producing non-intact products, the safety of the finished product depends primarily on the safety of raw materials

• If you are a purchaser, you maximize safety of the raw materials by having a **system in place** – a written purchase program

• The written purchase program supports a decision that the supplier and purchaser are controlling STEC.
Purchase Program

• Three Components:
  - Letter of Guarantee (LOG)
  - Laboratory Results or Alternative
  - On-going communication with the supplier

• Other General Points
  - Program should be written
  - Program can be pre-requisite or part of HACCP plan
  - Document implementation of program
LOG

- First component of a purchasing program is a LOG from the supplier
- The LOG should include:
  - STEC is a hazard in the supplier’s HACCP plan and is addressed with a validated CCP;
  - Details of the supplier’s testing programs;
  - A High Event Period (HEP) program, which includes consideration of sub-primals;
  - No commingling (or intervention after commingling); and
  - On-going verification by supplier, e.g., audits and “check samples”
Intended Use

• It is VITAL to understand the Intended Use of the product you are purchasing!
  - Is it intended for grind?
  - Has it been tested?

• Do you KNOW how you intend to use product?
  - Are you creating bench trim?
  - How do you manage it?
Check Samples

• Supplying establishment sends out trim samples for verification that the process is in control and the testing program is adequate.
  - These samples are taken once per quarter in January - March and October - December and once per month in the other months (for a total of eight per year).
  - The supplying establishment will post these results on its web site or provide to the purchaser.
Lab Results

• The second component of a purchasing program is review of laboratory results or an alternative
• For trimmings/two-piece chucks, products generally are accompanied by a COA
• Other potential ground components and primals/subprimals generally do not have a COA
• Purchaser has options....
Purchaser Options

In lieu of COA, purchaser has several recognized options:

- The simplest option is the “check sample program” where the supplier sends out trim samples for verification that the process is in control and the testing program is adequate.
- Another option is the receiving establishment can treat the incoming product with an intervention validated to reduce STEC.
- Third option is for the purchaser to conduct testing carefully.
Testing

• Testing of incoming or finished product is **not** required
• If one tests, one should do so with a sound plan
  - Identify the product implicated by a sample
  - Ensure ALL implicated product is held; please note, you may NOT have all product implicated
  - Properly collect and analyze sample
  - If screen positive, potentially confirm with FSIS method
  - When in doubt – seek assistance before sampling
On-Going Communication

• The third component of the purchase program is on-going communication with the supplier.
• Can be done by periodically checking the supplier’s web site for:
  - The LOG
  - The intended uses of the various products
  - The annual third-party audits
  - The results of the check sample program
• Can be done by having an approved supply list
Traceability

• No matter if you test or not, understand your process.
  - How are your lots identified?
  - How do you handle rework?
  - Have you thought about risk mitigation between products and lines?

• How do you manage your inventory and raw material?
  - Do you run a lot/PO in sequence?
  - Do you sequence your multi combo lots and single combo lots?
Real World Implication

• My Inspector says I have to test.

• Testing is part of my HACCP Program.

• Testing was part of a Corrective Action in FSA.

• We set one box aside and use it for FSIS Tests.
Testing Implication

Raw Material & Lot Control

- Ground Beef
  - Pre-Tested Trim
  - Finished Product
- Offal
  - Shift
  - Day
  - Period
  - Pallet
- Trim
  - Combo
  - Pallet(s)

- Do you have the full lot?
- Have you or others used part of lot previously?
What does a Test Result Mean

• Case Study 1: Further Processor notified Supplier of a GB *E. coli* POS.

• Case Study 2: Further Processor notified Supplier of a GB *E. coli* POS.

• Case Study 3: Further Processor notified Supplier of a Trim *E. coli* POS.
Case Study 1

- Further Processor Tested Ground Beef as Raw Material.
- Analysis Method was ELISA Screen with High False POS Rate.
- No Cultural Confirmation was performed.
- Further Processor had recall for not holding product from same date.
- Supplier had immediate investigation and FSIS Requested Recall Worksheet.
- Would have been nationwide recall if not for raw material supplier actions.
Case Study 2

- Further Processor Tested Ground Beef as Raw Material.
- Lab used MLG Method for Carcass Swabs.
- Reported as POS via PCR (High False POS Rate).
- Sample was ~60F when Received at Lab.
- No Cultural Confirmation.
- Date of Production for Sampled Product was unclear.
- Multiple Dates of Product in Question for Supplier.
- Sample Result Questionable.
- FSIS Engaged to Review.
- No Recall.
Case Study 3

• Further Processor Trimmed Primal captured Bench Trim for Testing and Ground Beef.
• Sample was analyzed with PCR Method and Confirmed POS.
• FSIS Reviewed Records and thought that the Further Processor only utilized Primals from a single source.
• District Office to District Office Communication and EIAO Review at Source Plant.
• Food Safety System functioning as intended and No Recall.
Testing Your Way to Food Safety

• What does a NEG result of raw material mean?

• What does a POS result of raw material mean?

• What does a NEG result of a verification sample mean?

• What does a POS result of a verification sample mean?

• Testing is a verification of the System. You have to assess measures taken in the plant to address potential Food Safety issues based on process.
Holistic Approach

• Know your Supplier and Intended Use.
• Understand that Sampling and Analysis is part of a Food Safety System.
  - Harvest Systems
  - Interventions
  - Chilling
  - Sanitation
  - Sampling
    • High Event Periods
    • Verification Samples

• Further Processor Process is an Extension of Supplier Process.
Questions ????