United States Department of Agriculture
Food Safety and Inspection Service

Treatment of Primal Cuts

STEC - Addressing the Challenges,
Moving Forward With Solutions
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Background

- Since 1994 when *E. coli* O157:H7 was first declared an adulterant in raw product, FSIS focus has evolved:
  - *First:* Finished product associated with illness
    - Raw ground beef
  - *Second:* Intended use of raw beef source materials throughout production at slaughter/dressing, fabrication, grinding, retail

Policy Implementation

- Public health risk presented by beef product contaminated with *E. coli* O157:H7 is not limited to raw ground beef (64 FR 2803, January 19, 1999)
  - Distinctions in intended use of product
    - ***Non-intact products* – Adulterated if contaminated**
      - **Injected, tenderized**
      - **Comminuted (ground)**
    - ***Intact products for use as non-intact product* – Adulterated if contaminated**
      - **Manufacturing trimmings**
      - **Non-designated primal and sub-primal cuts (tenderized; bench trim; ground)**
    - ***Intact products distributed for consumption as intact product* – Not adulterated if contaminated**
      - **Designated primal (roasts) and sub-primal cuts (steaks)**

Policy Considerations

- Evidence that non-designated primal cuts are ***not*** being treated similarly as boneless manufacturing trimmings regarding interventions and testing (Attachment #5 Checklist to FSIS Notice 65-07)
- Evidence that a substantial amount of primal cuts are used as source material for non-intact raw beef (Attachment #5 Checklist to FSIS Notice 65-07)
- FSIS does not currently include non-designated primal cuts or derived bench trim in trim testing programs
  - Boneless manufacturing trimmings and other raw beef components are collected by FSIS at slaughter/fabrication establishments or Port of Entry prior to co-mingling with other product from other production lots or establishments
  - Two-piece chuck is considered “trimmings”

Policy Assumptions

- Acceptance of point source contamination events has been instrumental in ensuring contaminated source materials are diverted from raw beef production and trends in *E. coli* O157:H7 positive findings addressed
  - Groupings of combo bins or packaged units generally are treated as independent of each other through robust testing coupled with assurance that slaughter/dressing procedures were properly implemented
  - "Tested" groupings of product generally are not sold intact
- Slaughter/fabrication establishments have focused on the boneless manufacturing trimmings but not on the primal cuts or the production equipment used to convey or handle raw beef
- Establishments rely heavily upon the "mark of inspection" as evidence that *E. coli* O157:H7 is ***not a food safety hazard reasonably likely to occur*** rather than take steps to demonstrate that their food safety systems are effective in reducing the risk of contaminated product entering commerce

Policy Next Steps: Short-Term

- Reassess the policy assumptions for ways to positively change industry and FSIS practices:
  - Focus on slaughter/dressing compliance
    - Review industry data on effectiveness of sanitary practices, including linespeed
  - Assess relatedness between "testing" performance of trim/primal cuts to that of the slaughter/dressing performance
    - Review industry data on effectiveness of preventing contamination of primal cuts versus that of boneless manufacturing trimmings
  - Discourage breaking up of "tested" groupings of product

Policy Next Steps: Long Term

- Assess the feasibility, practicality, and appropriateness of addressing *E. coli* O157:H7 adulteration status differently than on an intended use basis
- Assess the assumption that *E. coli* O157:H7 is not reasonably likely to occur beyond the slaughter operation

Questions?