



If it affects you or the meat industry, you'll read about it in the...

AAMPALIFIER

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Are Your Purchase Specifications Adequate To Pass EIAO Scrutiny?

Recently the AAMP office was notified by multiple AAMP members that new scrutiny was being placed on the purchasing specifications and *E.coli* O157:H7 interventions as it relates to beef raw materials. When USDA establishments were notified a few years back that they must reassess their HACCP plans to determine if *E. coli* O157:H7 was a hazard likely to occur, most establishments developed purchase specifications to address this issue. Regarding the purchase specifications addressing *E. coli* O157:H7, a grinding establishment may determine that *E. coli* O157:H7 is a hazard that can occur in its production process but is not reasonably likely to occur because the establishment has purchase specifications that require that all of its suppliers have one or more CCPs in their HACCP plans that are validated to eliminate or reduce *E. coli* O157:H7 below detectable levels. These purchase specifications were traditionally updated annually, and that seemed to appease FSIS inspection personnel. Now, increased scrutiny has been placed on this methodology.



Within the *E. coli* O157:H7 compliance guidelines (*i.e.*, Compliance Guidelines for Establishments on the FSIS Microbiological Testing Program and Other Verification Activities For *Escherichia Coli* O157:H7 – issued April 13, 2004), examples are provided of how grinders may ensure that their purchase specifications are met. These guidelines explain that a single annual letter from a supplier stating that it has interventions in place is not enough supporting documentation to provide good decision-making to support that this food safety hazard is not likely to occur. On the other hand, according to the 2002 Federal Register (Volume 67, pages 62329-62330), if grinders rely on their purchase specifications to address *E. coli* O157:H7 and determine, based on these purchase specifications, that no additional steps are necessary to address *E. coli* O157:H7, they need to ensure that their suppliers meet these purchase specifications. This applies whether incoming raw beef product comes directly from a supplier or from a broker.

To assist you, AAMP has worked with numerous member plants and developed generic purchase specifications that seem to satisfy FSIS inspection personnel and not create a hardship for you.

GMP FOR PURCHASING BEEF

Beef purchased by Establishment ABC for use in our products will be required to meet our purchase specifications as outlined below:

- Establishment ABC only purchases beef from suppliers that are USDA inspected, in which every box is labeled with the USDA Mark of Inspection (*i.e.*, “USDA Inspected and Passed”). Therefore, every shipment is in compliance with USDA regulations and requirements prior to its arrival at Establishment ABC.
- A yearly letter will be obtained from suppliers stating what the supplier is doing to eliminate or reduce *E.coli* O157:H7 to undetectable levels and that the supplier is in compliance with FSIS regulations regarding *E. coli* O157:H7.
- Suppliers will be contacted quarterly to ensure the interventions are being conducted and the intervention methods have not changed. This contact will be recorded in a log, including the date, time of contact, the person contacted, title/position of the person contacted, and the status of their methods. This will serve as Establishment ABC verification of the *E. coli* O157:H7 interventions.
- The supplier will immediately notify the HACCP Coordinator or Plant Management of Establishment ABC if its interventions have been ineffective or not appropriately applied.
- The supplier must have CCP's addressing *E.coli* O157:H7 and verification of the testing conducted for the pathogens.
- If Establishment ABC conducts product testing and the test results in a positive test result, the establishment will discontinue buying from that supplier, or will contact the supplier so that the supplier can determine what control measures have failed. If the supplier makes appropriate changes to its controls or interventions so that the supplier could justify that it had effectively eliminated *E.coli* O157:H7, the plant could continue purchasing from that supplier.

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AAMP acknowledges that other verification techniques exist, but believes that they are economically burdensome or not feasible for very small establishments. They also cause everyone to question the fact that meat is already in commerce that is clearly marked as "inspected and passed" by the USDA. The average consumer takes comfort from viewing the inspection legend on meat packages, so why should meat processors be any different? While the debate rages on about the true meaning of the mark of inspection, you should take another look at your current purchase specifications.

Numerous documents have been posted on the AAMP website (www.aamp.com) to assist you while you reexamine your purchase specifications. Furthermore, University of Nebraska-Lincoln professors have also developed a Standard Operating Procedure document regarding Receiving Raw Ground Beef Components or Raw Beef Patty Components.