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FSIS Responds To *E. coli* Conundrum

Key Initiatives Announced

As part of the response to the recent *E. coli* outbreaks and FSIS recalls, the Agency has rapidly attempted to save face by issuing a flurry of notices and announcing new initiatives for plants producing raw beef products.

These new initiatives include:

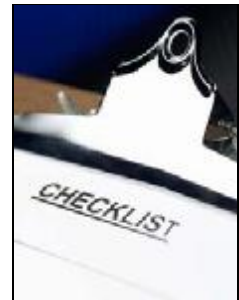
- **Testing and analysis of trim:** Started in March of 2007, this type of testing gives FSIS more data to analyze in determining and implementing the most appropriate actions to reverse upward trends.
- **Verifying control of *E. coli* O157:H7:** FSIS notified the beef industry of their expectations in this area, providing specific examples of minimum controls that would meet the minimum criteria for a “well-controlled” process, in an attempt to limit vulnerabilities.
- **New checklist for verifying control:** FSIS inspection program personnel will review both suppliers and processors based on a new checklist, and data will be updated quarterly to help the Agency more quickly identify significant changes in plants' production controls and ensure that the company takes corrective action.
- **Testing more domestic and imported ground beef components:** Materials that are used as components in raw ground beef, in addition to the beef trim already tested, along with imported product will now be subject to additional sampling.
- **More rapid recalls:** FSIS now takes into account a broader, more complete range of evidence when evaluating whether to seek a recall or take regulatory action.
- **Targeting routine testing:** In January of 2008, FSIS will begin routine targeted sampling for *E. coli* O157:H7 at slaughter and grinding facilities. Currently, all plants have an equal chance of being tested, but under this new verification testing program, the Agency will test larger volume operations more frequently than in the past. Data from the checklists will be used to determine testing at establishments.
- **Ensuring safety of imported beef products:** FSIS notified countries that export raw beef product to the U.S. of new policies and programs and is working with them to ensure they implement the same or equivalent measures to protect the public from *E. coli* O157:H7 risks.
- **Strengthening communications with public health partners, stakeholders, and inspection program personnel:** Meetings will be coordinated between federal agencies, as well as state and local public health officials, to work together to improve food safety. Educational opportunities for small and very small plants will continue to take place, and FSIS will work with stakeholders to solicit their opinions on any additional steps that FSIS and the industry can implement.

E. coli Reassessment Notice Issued

FSIS NOTICE

FSIS Notice 65-07, “**Notice of Reassessment for *Escherichia coli* O157:H7 Control and Completion of a Checklist for All Beef Operations,**” was issued in order to make inspection personnel aware of a number of significant developments involving *E. coli* O157:H7 in beef products that occurred since the beginning of the high prevalence season for this pathogen in April. According to this notice, establishments conducting beef operations (i.e., official establishments that slaughter, fabricate, grind, mechanically tenderize, or enhance beef products) should have reassessed their HACCP plan by October 26, 2007. Inspectors are then to follow-up to ascertain whether and how the establishment reassessed and submit this information by November 2, 2007.

This notice contains draft of a checklist that inspection personnel are to review. The goal of the checklist is to identify those beef operations that are not employing “certain interrelated practices that FSIS has identified as being established as directly contributing to control” of *E. coli* O157:H7. **When a final version of the checklist is issued, inspectors are to collect a variety of information, which will be used to determine targeted approaches for FSIS’ risk-based verification testing program and assist in prioritizing the scheduling of Food Safety Assessments (FSAs).** Before inspectors submit the answers to the checklist, they are to share a copy with plant management at which time the plant has the opportunity to verify that the information is correct. The checklists are to be completed by November 30, 2007.



FSIS also issued Notice 64-07, “Scheduling Food Safety Assessments and Intensified Verification Testing,” and Notice 66-07, “Multiple Follow-Up Sampling after FSIS Positive *Escherichia coli* (*E. coli*) O157:H7 Results.” Notice 64-07 clarifies when FSIS District Offices are to schedule Enforcement, Investigations, and Analysis Officers (EIAOs) to conduct FSAs and Intensified Verification Testing (IVT) in response to a positive pathogen result in FSIS product testing. FSIS Notice 66-07 provides inspectors with new instructions for multiple follow-up samples of raw ground beef, raw ground beef trimmings, and other raw ground beef and raw beef patty components. Follow up sampling is being implemented because data shows that plants are more likely to have a second positive sample if they have had a positive within the preceding 120 days.

More detailed information regarding the *E. coli* situation is covered in the November 1, 2007, edition of the *AAMplifier*. The notices, along with resources to assist plants with their *E. coli* Reassessments can be viewed at www.aamp.com.