

**TEXAS DEPARTMENT OF STATE HEALTH SERVICES  
MEAT SAFETY ASSURANCE  
AUSTIN, TX**

<b>MSA Notice</b>	10,010.3	1/21/15
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**TRACEBACK METHODOLOGY FOR *ESCHERICHIA COLI* (*E. COLI*) O157:H7 IN RAW  
GROUND BEEF PRODUCTS AND BENCH TRIM**

## **I. PURPOSE**

This directive instructs Enforcement, Investigations, and Analysis Officers (EIAOs) and other inspection program personnel (IPP) on the steps that they are to take for traceback investigations when MSA or another State or Federal agency finds that ground beef or bench trim have tested presumptive-positive for *E. coli* O157:H7.

### *KEY POINTS:*

- *Instructs EIAOs and other IPP on how to conduct product traceback from the grinder or bench trim establishment*
- *Instructs Central Office (CO) personnel on actions that they are to take during a product traceback*
- *Provides information on requesting that a sole source originating supplier slaughter establishment recall product when MSA laboratories or another State or Federal agency identifies that establishment as having sent product into commerce from a lot that tested positive in a sample collected at the grinder or bench trim (receiving) establishment*

**NOTE:** For the purpose of this directive, the term "EIAO" includes all MSA personnel trained in EIAO methodology.

## **II. BACKGROUND**

FSIS announced in a [Federal Register notice](#) (79 FR 47417), dated August 13, 2014, that it was implementing new procedures for when FSIS or another Federal or State agency finds raw ground beef presumptive-positive for *E. coli* O157:H7. This methodology will improve MSA's ability to determine whether the establishments that produced the source materials for contaminated product have produced other product that may not be microbiologically independent from the contaminated product. The Agency also announced that it will request a recall if an establishment was the sole supplier of beef trim source materials for ground product that MSA or another State or Federal agency finds positive for *E. coli* O157:H7, evidence suggests that contamination most likely occurred at the supplier establishment, and a portion of the product from the originating source lot was sent to other establishments.

Finally, it announced the availability of a compliance guideline concerning establishment sampling and testing for Shiga toxin-producing *E. coli* (STEC) organisms or virulence markers and a compliance guideline on *E. coli* O157:H7 sampled and tested labeling claims.

### **III. CO RESPONSIBILITIES**

A. The CO is to assign an EIAO or other IPP to conduct a product traceback investigation at the slaughter, grinder or at the bench trim establishment and at any suppliers that provided source materials for that product as needed following the receipt of a presumptive-positive test result or notification by another State or Federal agency of such a result.

B. The Circuit Manager (CM) or designee in the circuit in which originated the product that was the subject of the positive test result at the slaughter, grinder or bench trim establishment, is to review and evaluate the product traceback information to determine whether adulterated product entered commerce, or whether additional enforcement action is warranted.

C. When a supplier establishment is located in a foreign country, the CO will notify the FSIS District Office (DO). The CO is to provide the DO with foreign supplier information collected during the product traceback.

### **IV. EIAO OR OTHER IPP RESPONSIBILITIES FOR CONDUCTING PRODUCT TRACEBACK**

A. EIAO or other IPP product traceback investigations are to identify all source materials and potential suppliers of beef components used as source materials in the production of the sampled lot of ground beef or bench trim. The EIAO is to consider the slaughter process, sanitary dressing, and fabrication process employed at the original source slaughter establishment.

B. The EIAO or other IPP are to examine the results of any sampling conducted by either the grinding or bench trim establishment at which the positive was found or by the slaughter establishment that produced the source materials.

C. EIAOs or other IPP are to:

1. Review the supplier and source material information collected by the IPP at the time of the sample collection (see Attachment 1), including information documenting whether any source material that has been co-mingled with other product or potentially contaminated product is available for sampling, as well as the volume (e.g., weight) of the product;

2. Document evidence and prepare a written analysis that provides a summary of the findings and any recommendations for further action when:
  - a. Product may be in commerce;
  - b. An enforcement action is warranted; or
  - c. A food safety assessment (FSA) is needed.
3. Stop the investigation if the “presumptive-positive” test result confirms as “negative” during the course of the investigation;
4. Contact the CO immediately whenever traceback findings indicate that adulterated product entered commerce, or when administrative action is warranted; and
5. Use the questions in Attachment 2 as a guide when conducting a traceback investigation.

## **V. RECALLS FROM SOLE SOURCE SUPPLIERS**

If IPP become aware that contaminated product has entered commerce and meets the following criteria, they are to contact the CO. The CO is to convene the recall committee and determine whether a recall is warranted.

1. MSA or other State or Federal agencies find raw ground beef positive for *E. coli* O157:H7 at a grinding establishment;
2. MSA determines that *E. coli* O157:H7 cross-contamination is unlikely to have occurred at the grinding establishment where the sample was taken (based on MSA’s assessment of the grinding establishment’s handling practices);
3. MSA determines that the grinding establishment did not combine material from multiple source lots to create the lot of product that tested positive;
4. After conducting traceback to identify the slaughter and trim fabrication supplier that provided the sole source material, MSA determines that the supplier or downstream users split the implicated lot before sending it to the establishment where the positive sample was taken; and
5. Some portion of the split lot sent to the grinder was sent into commerce for further processing into product that does not receive a full lethality to eliminate *E. coli* O157:H7 in an inspected establishment.

## **VI. QUESTIONS**

Refer questions through supervisory channels.

A handwritten signature in blue ink that reads "James R. Dillon". The signature is written in a cursive style with a large initial 'J'.

James R. Dillon, DVM, MPH  
Director, Texas State Meat and Poultry Inspection Program  
Department of State Health Services

Attachment 1

**Supplier and Source Material Information for the Sampled Lot Collected by IPP at the Time of Ground Beef or Bench Trim Sample Collection**

A. Supplier information used in the production of the sampled lot if the establishment produces the source materials in-house:

1. Confirmation exists that it was produced in-house (establishment name and number);
2. Lot numbers or slaughter dates;
3. Production dates including slaughter production days if available;
4. Name of the beef components used in the production of the sampled product (e.g., beef trimmings, subprimal cuts, beef hearts, veal trimming, weasand, head or cheek meat) or any information that clearly identifies the source material used;
5. Information on the label of the source product; and

**NOTE:** IPP can keep the actual label from empty packages.

6. Approximate amount of the beef component produced in each lot (in lbs).

B. Supplier information from each supplier used in the production of the sampled lot if the establishment uses the source materials from a domestic outside source:

1. Establishment name and number;
2. Establishment phone number;
3. Establishment point of contact:
  - a. Name;
  - b. Title;
  - c. E-Mail address; and
  - d. Fax number:
4. Supplier lot numbers or slaughter dates;
5. Production dates;
6. Name of the beef components used in the production of the sampled product (e.g., beef trimmings, subprimal cuts, beef hearts, veal trimming, weasand, head or cheek meat or any information that clearly identifies the source material used). Collect information from the label of the product; and

**NOTE:** IPP can keep the actual label from empty packages.

7. Approximate amount of the beef component produced in each lot (in lbs).

C. Supplier information from each supplier used in the production of the sampled lot if the establishment uses the source materials from a foreign outside source:

1. Foreign establishment name;
2. Country of origin;
3. Foreign establishment number;
4. U.S. Import establishment number (stamped on shipping cartons or on MSA Form 9540-1);
5. Import establishment and importer of record (if available) point of contact, collect the following information:
  - a. Name;
  - b. Title;
  - c. E-mail address; and
  - d. Fax number:
6. Inspection certificate number (contained on the inspection certificate and MSA form 9540-1; for Canada, it is on the cartons and is the same as the “shipping mark”);
7. Production date or any other information, such as barcodes or production codes that identifies the product’s date of production;
8. Shipping marks (see NOTE);
9. Date the imported product entered the country (obtained from shipping documents, if available);
10. Name or description of supplied source material used in the production of the sampled product (e.g., beef trimmings, subprimal cuts, beef hearts, veal trimming, weasand, head or check meat or any information that clearly identifies the source material used).

**NOTE:** Shipping marks are unique alphanumeric characters applied to the shipping cartons in the foreign country. They are important for tracing the product. The mark links product with the foreign inspection certificate.

## Traceback Questions

### II. Traceback at Ground Beef Positive (MT43) and Bench Trim (MT55) Establishments Where MSA or other Federal or State Entity Found the Positive Sample Result

#### General Questions

G1. Provide the MSA sample form number or any identifying information for the positive.

G2. What is the production date of the positive sample?

G3. Indicate whether all raw beef products implicated by the positive test result (includes ground product and source materials) are under establishment control or if they have been shipped.

**NOTE:** Traceback at Bench Trim (MT55) Establishments go to “Purchased Source materials (Supplier information)” Section

#### Source Materials Slaughtered On-Site

S1. Were any of the source materials used to produce the positive product from the establishment’s own slaughter operation (i.e., in-house source materials)?

- Yes some of the source materials were produced in-house
- Yes, all of the source materials were produced in-house (i.e., establishment is a **sole-source supplier**)
- No, none of the source materials were produced in-house (i.e., the source materials were from purchased product only) (skip in-house source materials and Sanitary Dressing).

Was the slaughter establishment the sole supplier for the bench trim or the ground beef that tested presumptive positive?

S2. Did the supplier co-mingle primal or subprimal cuts and then send some of the same lot used to produce the bench trim that MSA found positive to additional establishments?

S3. Did the establishment ship any of the lot(s) of in-house source materials used to produce the positive to another establishment or into commerce?

S3a. Explain where product is shipped and if it is implicated.

### III. Sanitary Dressing (Supplying slaughter establishments only)

**The following questions ask about the supplying slaughter establishment’s sanitary dressing procedures for the production period in question**

SD1. Did the establishment successfully execute its sanitary dressing procedures as written during the production period in question?

- Yes

- No
- The establishment does not have a written sanitary dressing program
- Other (Specify)

SD2. From your observations of the establishment's sanitary dressing procedures, did you identify any concerns?

- Yes
- No
- No, did not observe slaughter process

SD3. Explain your concerns.

SD4. During the production period in question, is there any evidence (establishment records or NRs during zero tolerance, sanitary dressing, SPS (incidental contamination), SSOP, HACCP tasks, etc.) that cross-contamination occurred for the production period in question?

- Yes (specify)
- No

SD5. Is there any evidence of other systematic failures in the establishment's sanitary dressing and process controls during the time period in question?

SD6. If the establishment experienced systematic failures in its sanitary dressing and process controls, describe the conditions. List the evidence that supports this conclusion. Include in your discussion the results of the establishment's sanitary dressing and process control procedures (see MSA Directive 6410.1) that are included in its HACCP plan, Sanitation SOP, GMP, or other prerequisite programs for the production day in question.

SD7. Summarize your findings of the establishment's implementation of its sanitary dressing procedures based on your records review and observations. Explain if the establishment did not maintain adequate separation during dressing.

### **Microbiological Independence**

M1. How does the establishment define the sampled lot of ground beef products?

M1a. Are the same source materials used in product across multiple days' production?

M1b. Are the same source materials used in other production periods or lots at the establishment?

M1c. Does the establishment have adequate support for its sampled lot definition?

M2. Does the establishment apply interventions to any of the source materials used in ground beef production during the production period in question?

- No, the establishment does not apply any interventions
- Yes, the establishment applies interventions to some source materials
- Yes, the establishment applies interventions to all source materials
- Other

M2a. Describe what interventions are applied during the production period in question.



M3. Is there any basis for concern about whether the intervention is validated, or whether it was properly implemented for the production period in question?

M4. Describe other information pertinent to any sanitation failures that the establishment or MSA documented during the slaughter production period in question that is not already included in your previous answers

M5. Does the establishment notify their purchasers of product of its intended use?

#### **IV. Establishment Sampling for In-house Source Materials (Slaughter establishments only)**

##### General Questions

- 2) Provide the following information regarding the establishment's generic *E. coli* or other indicator organism testing programs.
  - a. What are the results of the establishment's generic *E. coli* testing or other indicator organism testing program for the production period in question?
  - b. Do the results for the production period in question indicate a loss of control? Explain and support your answer.
- 3) Does the establishment conduct its own testing for *Salmonella* spp.? If so, does its testing results for the production period in question indicate a loss of control? Explain and support your answer.
- 4) Is there any evidence that the establishment experienced ongoing loss of process control according to establishment or MSA test results for the production period in question?
- 5) If the establishment experienced temporary or ongoing loss of process control, describe the extent of the loss of control for the production period in question. List the evidence that supports this conclusion.
- 6) If the establishment has an STEC Sampling Program provide the following information:
  - a. Did the establishment perform sampling as described in the establishment's sampling program during the production period in question?
  - b. What does the establishment sample as part of its STEC Sampling Program?
    - Samples carcasses during slaughter
    - Samples carcasses during fabrication
    - Samples beef manufacturing trimmings
    - Samples primal and subprimals during fabrication
    - Samples finished product ground beef (applies to grinder establishments only)
    - Samples other raw ground beef components (e.g. head meat, cheek meat, etc.)
  - c. How does the establishment define production segments to allow identification of affected source materials?
  - d. Do the establishment's sampling results provide a clear definition between production segments to allow identification of affected source material?

7) Provide the following information regarding the establishment's test results:

- a. Did the establishment receive any positive test results for the production period in question?
- b. What HACCP noncompliance did the establishment receive, if any, for the production period in question?

8) Provide the following information for the MSA ground beef sample or for any establishment positive test results, if applicable.

Did the establishment produce other raw beef products from the source materials produced on the same production lines or food contact surfaces as the source materials for the production period in question? Explain and support your answer.

### **Purchased Source materials (Supplier information)**

P1. Did the establishment purchase any of the source materials it used in the production of the ground beef product or bench trim product that tested positive?

- Yes
- No

P2. What type of establishment did the establishment purchase its source material product from?

- Sister slaughter establishment
- Slaughter establishment
- Foreign establishment
- Non-slaughter establishment

**NOTE:** A sister slaughter establishment is a slaughter establishment that ships all of its carcasses, carcass halves, or quarters to a single sister processing establishment within its corporate structure.

P3. Are any of the suppliers identified during the traceback as an originating slaughter establishment (that is not a sister establishment)?

- Yes
- No, the suppliers are not slaughter establishments
- Cannot determine
- 

P3a. Provide the establishment number of the known originating slaughter establishments.

P4. Did the establishment receive its source materials from a broker?

- Yes
- No
- 

P4a. Provide contact information for each broker.

**NOTE:** Traceback will not be performed at brokers.

### **Microbiological Independence**

M1. How does the establishment define the sampled lot of ground beef products or bench trim?

M1a. Are the same source materials used in product across multiple days' production?

M1b. Are the same source materials used in the other production periods or lots at the establishment?

M1c. Does the establishment have adequate support for its sampled lot definition?

M2. Does the establishment apply one or more interventions to any of the source materials used in ground beef or bench trim production during the production period in question?

- No, the establishment does not apply any interventions
- Yes, the establishment apply interventions to some source materials
- Yes, the establishment applies interventions to all source materials
- Other

M3. Describe what interventions are applied during the production period in question.

M3a Is there any basis for concern about whether the intervention is validated or whether it was properly implemented during the period in question?

Does the establishment sample purchased source materials or bench trim?

Yes

No

a. Did the establishment perform sampling as described in the establishment's sampling program during the production period in question?

b. How does the establishment define production segments to allow identification of affected source materials?

c. Do the establishment's sampling results provide a clear definition between production segments to allow identification of affected source material?

f. Based on experience, expertise, and knowledge of industry practices, what additional information regarding the establishment's sampling program is relevant?

M4. Provide the following information regarding the establishment's test results.

g. Did the establishment receive any positive test results for the production period in question?

i. How did the establishment identify all product affected including addressing source materials from other production lots if implicated?

l. If the establishment received positive test results, did the test results indicate a systematic cause of breakdown of process controls for the time period in question?

M4a. Describe any concerns regarding the establishment's testing program

M6. Do the source materials used in the production of ground beef or bench trim that tested positive have a certificate of analysis associated with them?

M6a. Describe the purchase agreements for purchased product during the production period in question.

M7. Does the establishment require any of its suppliers to meet the following specifications as part of its purchase specifications? Purchase specifications are a set of requirements for incoming product established by buyer and agreed upon by the supplier before the product is purchased.

- i. Validated intervention methods during slaughter
- ii. Validated intervention methods during fabrication
- iii. Testing of carcasses for STEC
- iv. Testing of trim for STEC
- v. Testing of primal and subprimals for STEC
- vi. Testing of other raw ground beef components
- vii. Others, please specify.

M8. Does the establishment have information or results from the supplying slaughter establishment on the source materials for the production period in question?

M8a. If yes, what were the results?

M9. Is there evidence of MSA or establishment documented any sanitation failures during production period in question? If so, describe the failures.

- b. If the establishment or MSA documented an event which would distinguish between the production period in question and other production periods, describe the event. List the evidence that supports this conclusion.
- c. If the establishment received any Sanitation Standard Operating Procedure (SSOP) noncompliance records (NRs) for the production period in question, describe any of the following if applicable:
  - i. Insanitary conditions on product contact surfaces
  - ii. Direct product contamination
  - iii. Other, please list.
- d. If the establishment received any SPS NRs for the production period in question, describe any of the following if applicable:
  - i. Improper employee hygiene
  - ii. Incidental contamination
  - iii. Insanitary equipment, utensils, rooms or compartments
  - iv. Food contact surfaces
  - v. Pest control failures
  - vi. Other, please list.

M10. Describe other information pertinent to any sanitation failures that the establishment or MSA documented during the slaughter production period in question that is not already included in your previous answers

M11. Summarize the results of the HACCP plan, Sanitation SOP, GMP, or other prerequisite program on

the source materials for the production period in question.

M12. Process Changes: Were there any changes in the process or procedures for the production periods in questions including but not limited to changes in monitoring procedures, process step, inventions or process and procedures? Specify.

M13. If there was any non-routine event that may have affected product during the production period in question, describe the event and the establishment's response.

M14. Describe other information pertinent to process changes that is not already included in your previous answers.

M15. Does the receiving establishment use primal and subprimal products as bench trim in their entirety to produce non-intact product?

M16. Has the establishment been notified of the supplier's establishment intended use of the product?

M17. Are the source materials being used consistent with the supplier's intended use?