



# Traceability

## *Recordkeeping:*

### *A Public Health Vulnerability*

AFDO 2010 114<sup>th</sup> Annual Educational Conference  
June 19-23, 2010  
Norfolk, Virginia



## BACKGROUND

- FSIS is the public health agency in the U.S. Department of Agriculture responsible for ensuring that the nation's commercial supply of meat, poultry, and egg products is safe, wholesome, and correctly labeled and packaged

## 2007(2008) Recall-Related Actions

- 57(46) recall actions; 4(5) public health alerts
  - 9(7) – Allergen
  - 1 – Botulinum
  - 1 – Improper cooling
  - 3 - Improper documentation/insanitation
  - 22(17) – *Escherichia coli* O157:H7
  - 11(11) – *Listeria monocytogenes*
  - 2(5) – Metal/other
  - 3(2) – *Salmonella* (frozen NRTE)
  - 1 – *Staphylococcus aureus*
  - 3 – Under-processing
  - 5(5) – Undeclared ingredient/adulteration
  - (4) - SRM



# ISSUE

- FSIS relies heavily on records maintained by industry to identify trace back and trace forward on FSIS-regulated products associated with foodborne illness and other food safety incidents
- Retail records are a critical component in trace back and trace forward activities
- Essential to quickly and effectively determine source product and ensure controls are enhanced by affected product manufacturers (e.g., official establishment, retail, foodservice)



# Statutes & Regulations

- 21 U.S.C. 621 authorizes Secretary to make rules and regulations necessary for the efficient execution of the statutes
- 21 U.S.C. 642 requires firms to keep and make available full and correct business records of transactions in food
- 9 CFR 320.1 specifies businesses and types of records required, such as bills of sale, bills of lading, receiving and shipping papers
- Similar authorities for poultry

# Agency Responsibilities

- OPHS epi-officers lead agency illness outbreak investigations
- OPEER investigators conduct trace back and trace forward investigations for outbreak investigations & other public health activities
- OPEER investigators conduct periodic surveillance in-commerce, including at retail, and collect ground beef samples to enhance public health protection and decision making

# Retail Record Vulnerability

- Recent outbreak investigations were impeded by poor retail records
  - OPHS investigated 16 cases of foodborne illness implicating raw ground beef products manufactured at retail in 2007-2008
  - Of the 16, only 9 retail operations kept production logs (e.g., grinding logs) sufficient for trace back and trace forward activities
  - Of the 9, 5 resulted in a recall



# Review of the 9 Retail Operations

- 7 recorded establishment producing source beef
- 6 recorded descriptions of the source beef
- 6 recorded grinding date/time
- 5 recorded descriptions of products ground
- 2 recorded sanitizing/cleaning between grinds
- 1 ground bench trim without sanitizing/cleaning, and then ground other product to replenish stock



# Ground Beef Sample Collection

- Conditions when OPEER investigators are to collect a sample for *E. coli* O157:H7 (Directive 8010.1, Appendix 1)
  - Grinding primals, subprimals, or boxed beef
  - Grinding store generated bench trim derived from own operations
  - Grinding beef labeled “natural” or “all-natural” (with exceptions)
  - Not cleaning and sanitizing grinder between use of different source materials
  - Grinding purchased trim not accompanied by records of negative test results for *E. coli* O157:H7
  - Using meat cuts (steaks or roasts) with expired sell-by dates
  - Mixing irradiated and non-irradiated beef
  - Grinding beef to sell as raw ground beef and failing to keep records that identify Federal or state establishment numbers of suppliers (source materials used in grinding)



# FSIS INTENTIONS

- Pursue rulemaking to enhance and modernize FSIS recordkeeping requirements
- Regulations expected to explicitly define required recordkeeping for ground beef manufacturing at retail
- Develop compliance guidelines retailers can use to meet FSIS' trace back and trace forward activities



# FSIS INTENTIONS

- Develop additional guidance for investigators focused on activities at retail level
- Continued retail surveillance, including food safety, food defense, records, and sampling
- Look at corporate practices, where applicable
- Investigate, document, and act on violations
- Use findings for decisions, such as for enforcement, product control, recalls, and other public health activities

# Production Records

- Producing retail operation's name and address (city, state, zip code)
- Product information
  - Date and time product was ground
  - Exact name and type of store ground product
  - Quantity of product ground
  - Production code of each lot of store ground product
  - Sell-by or use-by dates
  - Other info used to identify the store ground product
- Source (supplier) information
  - Establishment # for each source material used
- Cleaning/sanitizing information (e.g., date/time, especially significant between varied source materials)

## Other Information

- Telephone numbers of retail store
- Store contact person and phone #
- Number of outside/shipping containers of each source product
- Club Card information (if applicable)
- Retail store's pull-date policy
- Retail store's rework policy
- Retail store's cleaning and sanitizing policy



# Grind Log Example

Date of Grind	Time of Grind	Name of Source Product	Name of Supplier	Sell by Date	Est. #	Pack Date	Approximate Quantity Ground	Initials of Store Employee
6-4	9:15	Sirloin 10#	USA Beef	6-8	12345	5-22		J. Doe
6-4	9:20	Cleaned	And Sanitized	---	---	---	x	J. Doe
6-4	9:25	Angus Round 10#	Mighty Fine Beef	6-7	06789	5-20		J. Doe
6-4	9:35	Cleaned	And Sanitized	---	---	---	x	J. Doe
6-4	9:40	Chuck 40#	USA Beef	6-15	12345	5-29		J. Doe
6-4	10:00	Chuck 80#	USA Beef	6-17		5-31		J. Doe
6-4	10:10	Cleaned	And Sanitized	---	---	---	X	J. Doe
6-4	11:30	Sirloin 20#	USA Beef	6-9	12345	5-23	Patties 20#	J. Doe
6-4	11:45	Round 20#	USA Beef	6-16	12345	5-30	Patties 20#	J. Doe
6-4	12:00	Chuck 20#	USA Beef	6-17	1245	5-31	Patties 20#	J. Doe
6-4	12:30	Angus Round 10#	Mighty Fine Beef	6-7	06789	5-20	Patties 10#	J. Doe
6-4	12:45	Angus Chuck 20#	Mighty Fine Beef	6-14	06789	5-27	Patties 20#	J. Doe



# “Gold Standard” Log Example

Date - Time of Grind	Lot/ Batch Number (lot = same source material)	Exact Name/ Type of Product Produced	Package Size of Product Produced	Amount (in pounds) of Product Produced	Production Code of Product Produced	Manufacturer Name of Source Material Used for Product Produced	Product Code and/or Pack Date of Source Material Used	Establishment Number of Source Product Used	Comments	Initials
3/2/10 - 0700- 0830 AM	Lot 001	91/9 Gold Standard Ground Chuck	Catch-weight retail trays	1,250 lb total of 91/9 Ground Chuck	033109-01 GSGC; Sell-by 04/02/09	Boneless Chuck, twenty-one 60 lb boxes from USA Beef Company	BC031509 USA Packed on 03/15/09; BC031709 USA Packed on 03/17/09	Est. 00321 M	Cleaned and sanitized grinder after Lot 001; excess source material (approx. 10 lb) made into RTE chili; switched source materials	John Doe ID # 222



# FSIS Public Meetings

- Joint public meeting with FDA on Improving Product Tracing of Foods: More Rapid Outbreak Response (Dec 9 – 10, 2009)
- 2<sup>nd</sup> public meeting on product tracing to discuss procedures for suppliers of source material used to produce raw ground beef product that tests positive for *E. coli* O157:H7 (March 10, 2010)





## Contact Information

Larry S. Hortert, Southeast Regional Director

USDA-FSIS-OPEER-CID

[larry.hortert@fsis.usda.gov](mailto:larry.hortert@fsis.usda.gov)

FSIS Website:

<http://www.fsis.usda.gov>