

Informational and Disclaimer Statements on Ground Beef

- FSIS Directive 10,010.1, Revision 1 and a Compliance Guide address microbiological testing programs and other verification activities for *E.coli* O157:H7 in raw ground beef products and components. In these documents, labeling of special statements is addressed along with other controls that must be in place for these products. The labeling statements are grouped as “instructional” statements and “disclaimer” statements.

Because the directive and compliance guide require extensive tracking and control of product and related labeling materials, we do not believe it is necessary to add language on labeling that states that these products can only be sent to another federally inspected facility. *However, it is strongly recommended and if a company chooses to add this additional information as part of their control program, it would be acceptable, e.g., “for cooking at Establishment xxxx.”*

Furthermore, these statements are only for product shipped to other inspected facilities, not consumers, retail or for export. *Also, the two types of statements cannot be combined.*

- Instructional statements address how the product should be prepared or handled to ensure that the pathogen is eliminated or reduced to an undetectable level. Examples are:

”For full lethality treatment”

”For cooking only”

- Disclaimer statements address the types of controls or verification activities addressing the pathogens that were NOT used in the production of the product. Examples are:

”Product has not been tested for *E. coli* O157:H7”

”Untested for *E.coli*”

- Unacceptable statements that have been presented and the reason that the statement was not approved include:

”Not intended for grinding” – does not qualify as either type of statement

”Not for raw ground use” – does not qualify as either type of statement

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“Untested. Not intended for raw ground unless tested negative for *E. coli* O157:H7 or subject to cooking or equivalent” – statement implies that testing addresses *E. coli*. FSIS has generally taken the position that testing can’t be a Critical Control Point (CCP) or intervention.

“Untested. For Cook only unless tested negative for *E. coli* O157:H7” – statement implies that testing addresses *E. coli*. FSIS has generally taken the position that testing can’t be a CCP or intervention.

"Not tested - For full lethality" – The statement combines an instructional statement with a disclaimer statement which we would not recommend. Furthermore, the phrase "not tested" is not specific enough to inform the purchaser of what the product has “not been tested for."