

# **National Advisory Committee on Meat and Poultry Inspection**

## **Update on Applying the Mark of Inspection to Product Tested for an Adulterant: Guidelines for Industry for Holding Products When Sampled**

### **Purpose**

This briefing paper is provided to update the Committee on the actions that the Food Safety and Inspection Service (FSIS) has taken regarding the recommendations the National Advisory Committee on Meat and Poultry Inspection (NACMPI) made at its June 16-17, 2005 meeting.

### **Background**

In June 2004, FSIS presented to NACMPI the issue of whether FSIS should grant the mark of inspection to product that has been tested for an adulterant before the Agency has received the results of the testing. The Committee considered the issue and its impact on small and very small establishments and made a number of recommendations to the Agency. The Committee did not reach a consensus on whether the Agency should effect a test and hold policy for product it samples for adulterants. It recommended that the Agency continue to encourage plants to develop a plan for holding products when they are sampled for adulterants. The Committee further recommended that FSIS provide guidance to plants regarding holding products, and that FSIS should work with the industry on strategies that would mitigate some of the practical problems associated with holding products.

FSIS considered the advice of the Committee. The Agency met with industry about this issue. As a result, a group of industry trade associations drafted guidance for establishments on holding products when the Agency samples. The Agency also drafted guidelines focused on providing practical advice to small and very small establishments for holding products when the Agency samples for adulterants. At the June 2005 meeting, the Agency sought advice on the most effective way to provide the guidance to industry, especially to small and very small plants.

At its June 2005 meeting, the Committee recommended that:

- FSIS refrain from issuing its own guidelines at this time, but instead, review the industry guidelines to ensure that they conform to applicable laws, regulations and policies;
- Industry issue its guidelines after FSIS review, and work with the Agency to ensure widespread distribution, especially to small and very small plants; and

- FSIS should monitor the effectiveness of the industry guidance on an ongoing basis and take appropriate actions in response to the findings of the evaluation, ranging from recommendations for improving the guidelines to formal Agency action.

The industry issued the guidelines in September 2005 and completed mailing them to all inspected establishments in January 2006. The Agency is working with the industry group to disseminate the guidelines as widely as possible to the targeted audience – small and very small plants – and is planning an evaluation of the guidelines’ effectiveness.

## **Discussion**

In considering a possible evaluation of the guidelines’ impact on industry, and especially on small businesses, the Program Evaluation and Improvement Staff (PEIS), within the FSIS Office of Program Evaluation, Enforcement and Review, has collected and analyzed data concerning meat and poultry products held by industry until FSIS microbiological test results are received. Identifying trends in industry holding practices provides a context and baseline for any future evaluation of the guidelines’ impact. PEIS examined FSIS test data for the calendar years 2003 through 2005, as well as data for the first quarter of 2006, and grouped data by establishment size and pathogen. Specifically, PEIS examined the hold/release information included with Agency testing results for the following pathogens: *E. coli* O157:H7 in raw, non-intact beef produced by domestic official establishments;<sup>1</sup> *Listeria monocytogenes* (LM), *Salmonella*, and *E. coli* O157:H7 in domestically-produced ready-to-eat (RTE) meat and poultry; LM on food-contact surfaces in establishments that produce RTE meat and poultry products; and LM on non-food-contact surfaces in establishments that produce RTE meat and poultry products.

PEIS findings and attached graphs illustrating trends for each set of test results follow:

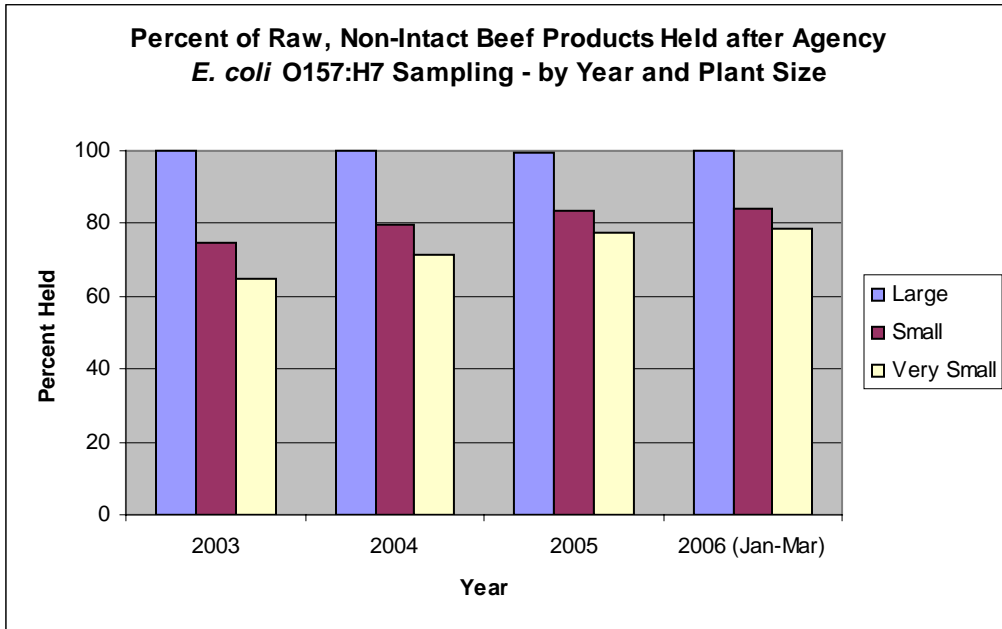
- So far in 2006, between approximately 80% and 100% of all meat and poultry products are being held by establishments prior to receiving Agency test results;
- With only one significant exception,<sup>2</sup> establishments of all sizes have increasingly held more product prior to receiving Agency test results every year since 2003, with large establishments holding almost all tested product every year since 2003;
- Impact of the industry guidelines is not apparent from the 2005 and 2006 data, i.e., there were no unexpected changes in the holding trends following issuance of the guidelines. Since very small establishments are currently holding the least amount of product following Agency testing, any future evaluation likely would seek to identify correlation between use of the guidelines and increases in holding by those very small establishments.

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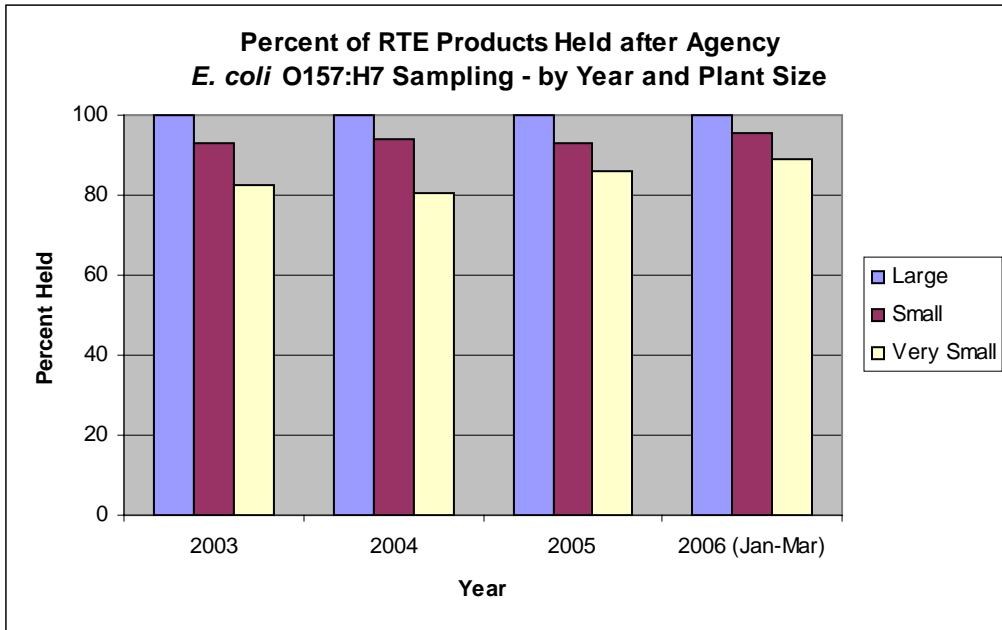
<sup>1</sup> PEIS did not examine results from the recently initiated Agency baseline testing of beef trim for *E. coli* O157:H7 and *Salmonella*.

<sup>2</sup> In 2004, very small establishments held only 78% of RTE products following Agency testing of food contact surfaces for LM, whereas they held approximately 98% in both 2003 and 2005. Agency testing data does not explain this decline. The few other declines seem to fall within expected rates of variation. Also note that the graphs were developed using only testing results for which FSIS had hold/release data. For small percentages of results (0 - 5% per test), hold/release data was not available to PEIS. This missing data possibly could increase percentages of product held and thus even out the small variations in the holding trends.

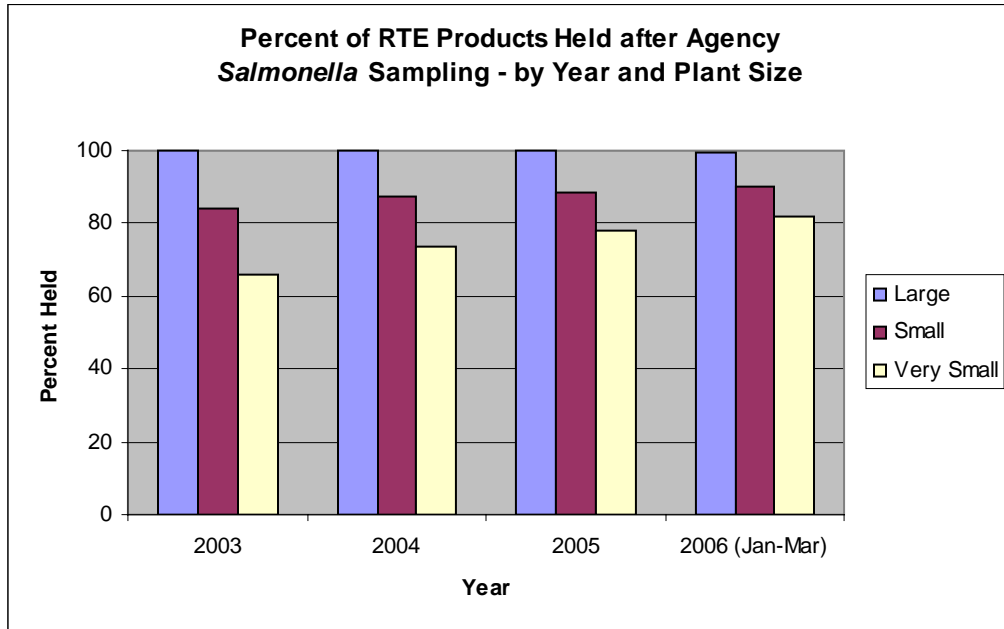
**GRAPH 1**



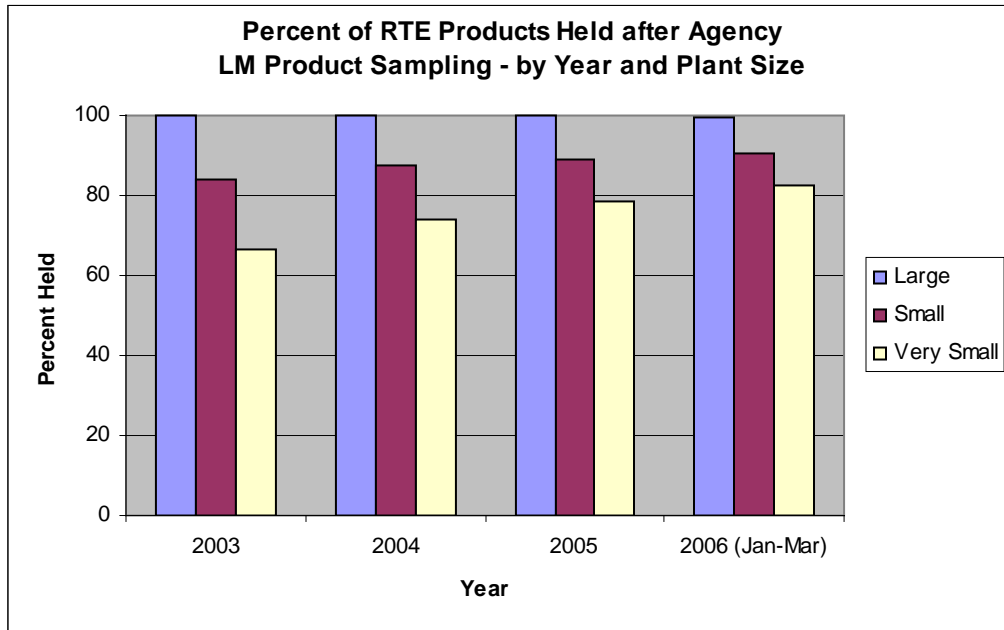
**GRAPH 2**



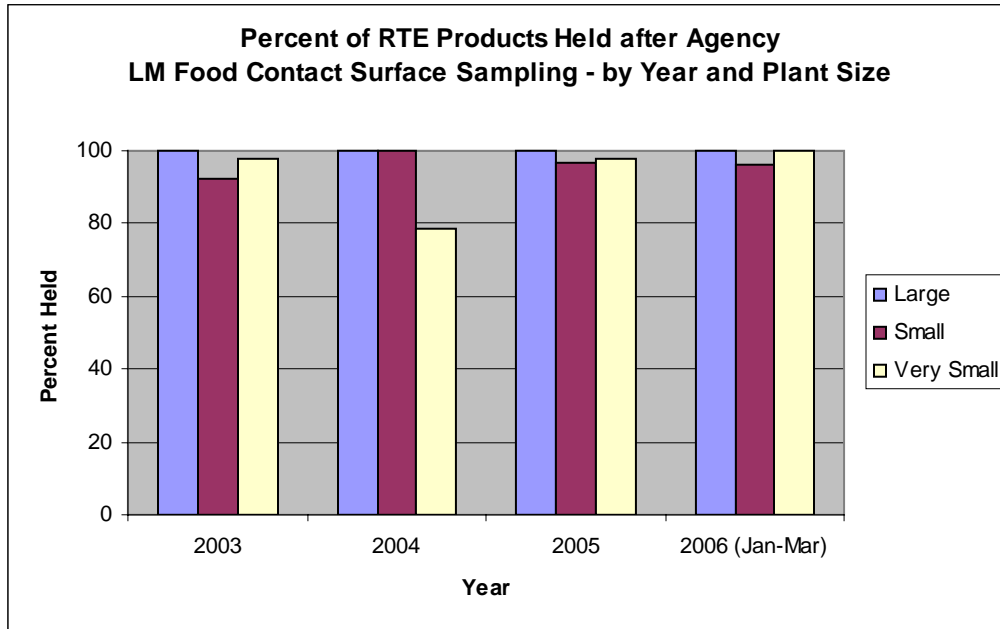
**GRAPH 3**



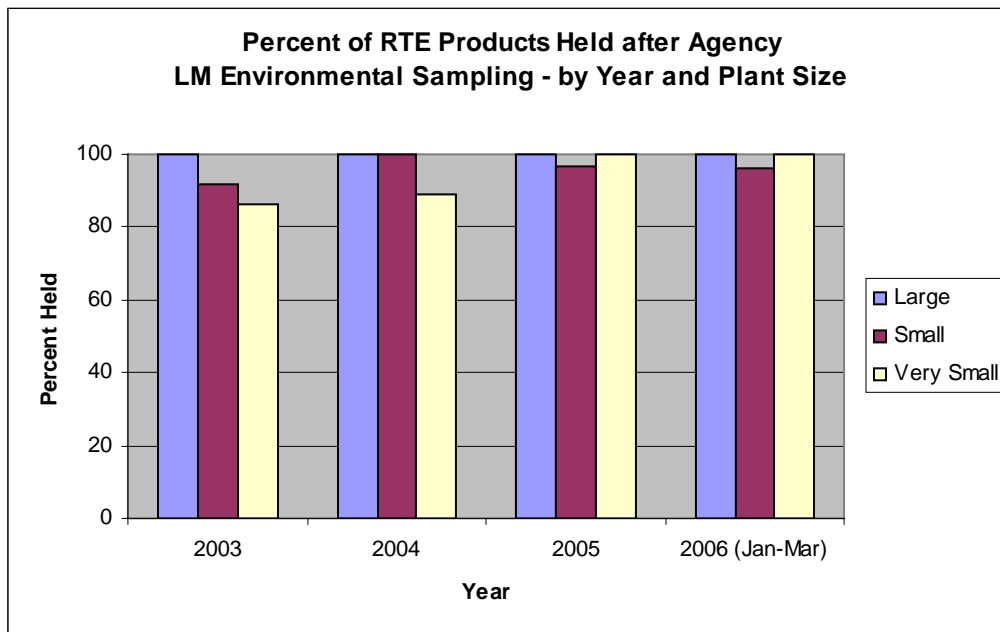
**GRAPH 4**



**GRAPH 5**



**GRAPH 6**



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