

## Edelstein, Rachel

**From:** Engeljohn, Daniel  
**Sent:** Monday, February 28, 2000 12:28 PM  
**To:** Edelstein, Rachel  
**Subject:** FW: Comments on FSIS Policy on E. coli O157:H7.

Rachel, I think these comments are from an FSIS employee, but I am not sure. Could you prepare a response for me thanking him/her for the comments and that we will put them in the record? OK? Thanks.

**DANIEL L. ENGELJOHN, Ph.D.**  
Director, Regulations Development and Analysis Division  
Food Safety and Inspection Service, USDA

- Phone: (202) 720-5627
- Fax: (202) 690-0486
- E-mail: [daniel.engeljohn@usda.gov](mailto:daniel.engeljohn@usda.gov)
- FSIS Web site: <http://www.fsis.usda.gov/>
- USDA Meat and Poultry Hotline: 1-800-535-4555

99-060N-1  
99-060N  
Allen Delwin

-----Original Message-----

**From:** Allen, Delwin  
**Sent:** Monday, February 28, 2000 12:17 PM  
**To:** Engeljohn, Daniel  
**Subject:** Comments on FSIS Policy on E. coli O157:H7.

Dr. Engeljohn,

I understand you are having a meeting tomorrow on FSIS Policy for E. coli O157:H7, so I thought I would forward you some information on some of the problems, and how some field personnel feel about it. I would certainly like to know your thoughts on the matter.

- 1) E. coli O157:H7 should be addressed in the plant's HACCP Program for cattle from feedlots and dairy cows due to their high concentrate/low fiber acid producing ration.
- 2a) Samples for E. coli O157:H7 should be increased at the **plant** level (sampling at the retail level is too little too late).
- 2b) The policy of 15 consecutive samples after a positive E. coli O157:H7 should be left alone.
- 2c) FSIS Directive 10,010.1 should be **rescinded** and "directed samples" for E. coli should be taken and sent to an FSIS lab.
- 2d) Carcass sampling should NOT replace ground beef sampling. (The cumulative effect of ground beef sampling is MUCH BETTER).
- 3) FSIS should NOT consider a plant's results for ANY testing, but rather do their own testing to assure the accuracy of the results.
- 4) The plant's testing/verification should NOT be considered. FSIS should **verify** the food safety of the plant's production.
- 5) ALL PRODUCT SHOULD BE SAFE TO EAT, WHETHER IT IS "INTACT PRODUCT" OR "NON-INTACT PRODUCT".  
If cooked to a high enough temperature, practically any meat, even carrion, would be safe to eat, but is this what the consumer expects or wants?
- 6) To my knowledge, there are no feedlots voluntarily taking cattle off full feed 5 days before slaughter and feeding a higher fiber ration to reduce the acidity, thus reducing E. coli.

Delwin D. Allen, DVM  
IIC/86E/Excel/Friona

-----Original Message-----

**From:** Allen, Delwin  
**Sent:** Wednesday, February 09, 2000 1:20 PM  
**To:** Knox, Alan; Goin, Ken; Pena, Roy  
**Cc:** Tripathy, Rasika; Ceur, Andrea  
**Subject:** FW: E. coli Program

Excel Corporation/86E/Friona does NOT sample their ground beef for E. coli O157:H7, and neither does FSIS.

The company only samples a very small piece of one half carcass ( ~ .00025% of the available surface area per shift that

is tested) after the steam pasteurization cabinet only once per shift. The sample is sent to a lab in Iowa and the results are sent to Excel Corporate headquarters in Wichita, Kansas, where they are tabulated, then sent to the respective Excel plant. The results that I have seen were only a list on a computer print-out.

Example:

86E 10/23/99 Negative

86E 11/19/99 Negative

These could be typed and printed on any computer/printer. I requested last week (Thursday 2/3) to see the actual lab report or a copy thereof. To date, I have not seen any verifiable documentation of any results of any samples tested for E. coli 0157:H7.

FSIS/86E/Friona received a directed sample (FSIS Form 10,210-3) (Project No. MT03) to take at least a pound of raw ground beef within 30 days of 1/31/2000 and send it to the Western Lab for analysis to determine the presence or absence of E. coli 0157:H7.

A sample of raw ground beef was taken on the night shift of Tuesday 2/2/2000. Excel management was extremely nervous about this sample being tested for E. coli 0157:H7, and said they were exempt. They appeared much more nervous about this than they were when we had the withholding action nearly 2 years ago (May '98). Their nervousness makes me even more suspicious; however, I realize the probability of finding a positive E. coli 0157:H7 is extremely low.

Note-1:

\*\*\*As a rule, the night shift slaughters rougher cattle than the day shift, which is when all of their customers and top Excel management visit. Also, the less experienced and new hired company employees are generally on the night shift.

Therefore, the slaughter and fabrication of these rougher cattle by less experienced workers has a potential for problems.

As you know, FSIS could not send this ground beef sample due to FSIS Directive 10,010.1, page 2, VI, B, 3, which pertains to the company's "pathogen reduction interventions on beef carcasses", which is their steam pasteurization cabinet, and the company's own verification of "the interventions effectiveness periodically through testing for E. coli 0157:H7" on a very small piece of only one half carcass per shift.

Note-2:

\*\*\*If 2,000 to 2,250 cattle are slaughtered per shift, then only a small piece of 0.04 to .05 percent of the carcass halves is tested. This is certainly not indicative of the cumulative effect of the outside trimmings of ALL carcasses, which go into ground beef.

According to FSIS Directive 10,010.1, ground beef will NEVER be tested for E. coli H7:0157, either by the company or FSIS.

The last ground beef sample to be tested for E. coli 0157:H7 here at 86E/Excel/Friona was nearly 2 years ago on 6/11/98. This was sent and tested negative before we had a ruling on this idiotic FSIS Directive 10,010.1, which appears to have been written by industry, and, by the way, **it should be rescinded**.

I feel FSIS is failing to accomplish its mission of consumer safety by not being allowed to take a ground beef sample for E. coli 0157:H7 at least once a year, of course more frequently would be better.

There is absolutely no way that FSIS can verify the presence or absence of E. coli 0157:H7 in ground beef, if a sample of ground beef is never sent to the FSIS lab to be tested.

According to MPI Regulations 318.2, paragraph b, "**All products, whether fresh, cured, or otherwise prepared, even though previously inspected and passed, shall be reinspected by Program employees as often as they may deem necessary in order to ascertain that they are not adulterated or misbranded at the time they enter or leave official establishments and that the requirements of the regulations in this subchapter are complied with.**"

One thing is for certain:

If neither the company nor FSIS samples the ground beef for E. coli 0157:H7, they can truthfully tell the public "E. coli 0157:H7 has NEVER been found in this ground beef".

Delwin D. Allen, DVM  
IIC/86E/Friona

-----Original Message-----

**From:** Ceur, Andrea  
**Sent:** Thursday, February 03, 2000 11:37 PM  
**To:** Allen, Delwin  
**Cc:** Haggard, Rick  
**Subject:** E. coli Program

Rick and I went down to the QA office Wednesday night to have a look at their written E. coli collection and testing procedures for carcass beef and the latest test results. We had remembered seeing a small notebook on the shelf with their E. coli testing procedures previously but when we went to look at it it was not there. We asked Bruce Pauling if it was available and he said it was kept over in the lab now. Tonight we went to see if it was brought back up to the QA office but it was still out in the lab. We asked the QA foreman Daniel Saiz if we could have a copy of the program and the test results required by Reg. 310.25(a) and FSIS Directive 5000.1 Part 4 available for night shift. He offered to go to take us over to the lab to see if he could find it but we just asked him to have it available to us tomorrow night at the QA office. I believe

they should keep a copy of their program and test results within easy access of program personnel at all times, including night shift. What do you think?