

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

<h1 style="margin:0;">FSIS DIRECTIVE</h1>	10,240.4, Revision 1	3/15/06
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**VERIFICATION PROCEDURES FOR CONSUMER SAFETY INSPECTORS
FOR THE *Listeria monocytogenes* (Lm) REGULATION AND INTRODUCTION
OF PHASE 2 OF THE Lm RISK-BASED VERIFICATION TESTING PROGRAM**

I. PURPOSE

This directive is reissued to provide Consumer Safety Inspectors (CSIs) with direction for implementation of the **new** Routine Lm Risk-Based (RLm) sampling program in FSIS Directive 10,240.5. This new testing program is referred to as the Food Contact, Environmental (Non-Food Contact), and Intact Product Verification Testing Program which throughout this issuance will be abbreviated as “RLm.” This directive also provides verification instructions for Ready-To-Eat (RTE) products when establishment product disposition occurs off-site. In addition, this directive provides CSIs with instructions for verifying whether establishments are complying with the regulatory requirements in 9 CFR Part 430, *Requirements for Specific Classes of Product*. Finally, this directive includes sample collection responsibilities for the CSI under the ALLRTE and RTE001 sampling projects.

NOTE: This directive contains all the information that CSIs need to verify the sections of 9 CFR Part 430 that relate to the control of *Listeria monocytogenes* (*L. monocytogenes*) in post-lethality exposed RTE meat and poultry products.

Key Points Covered

- *CSI verification of 9 CFR Part 430*
- *Sample collection responsibilities of the CSI for the ALLRTE and RTE001 sample projects*
- *Enforcement*
- *Verification of Corrective Actions*
- *Disposition of RTE product occurring off-site*

**DISTRIBUTION: Inspection Offices; T/A Inspectors;
Plant Mgt; T/A Plant Mgt; TRA; ABB; TSC; Import Offices**

OPI: OPPED

II. CANCELLATION

FSIS Directive 10,240.4, dated 10/2/03

III. REASON FOR REISSUANCE

This directive is being reissued to provide direction to CSIs regarding the implementation of the new RLM sampling program including the three projects, RLMCONT, RLMENVR, and RLMPROD, as part of Phase 2 of the Agency's overall *L. monocytogenes* risk-based verification testing program.

IV. REFERENCES

Title 21 United States Code (U.S.C.) section 453 et seq. and 601 et seq.

Title 9 Code of Federal Regulations (CFR) Part 416

Title 9 CFR Part 417

Title 9 CFR Part 430

Title 9 CFR Part 500

FSIS Directive 5000.1, Revision 1, dated 05/21/03

FSIS Directive 5400.5, dated 11/21/97

FSIS Directive 7355.1, Revision 2, dated 12/03/02

FSIS Directive 8080.1, Revision 4, Amendment 3, dated 3/2/06

FSIS Directive 10,200.1, dated 7/19/01

FSIS Directive 10,210.1, Amendment 6, dated 12/18/03

V. BACKGROUND

On June 6, 2003, FSIS published an interim final rule (68 FR 34207) that amended its regulations to require that official establishments that produce certain RTE meat and poultry products prevent product adulteration by the pathogenic environmental contaminant *L. monocytogenes*. In particular, 9 CFR 430.1 sets out definitions of terms. 9 CFR 430.4(a) states that *L. monocytogenes* is a hazard that an establishment producing a RTE product that is exposed to the post-lethality environment must control through its HACCP plan or prevent in the processing environment through a Sanitation Standard Operating Procedure (Sanitation SOP) or other prerequisite program.

The interim final rule also states that RTE product is adulterated if it contains *L. monocytogenes*, or if it comes into direct contact with a food contact surface that is contaminated with *L. monocytogenes*. 9 CFR 430.4(b) sets out three alternatives that establishments producing post-lethality exposed RTE product are to choose from in order to meet the requirements of 9 CFR 430.4(a). CSIs should verify establishment compliance with the regulatory requirements of 9 CFR 430.4(b).

Phase 1 of the *L. monocytogenes* risk based verification testing program was implemented in January 2005 with the RTE001 project for testing of post-lethality exposed ready-to-eat (RTE) meat and poultry products for *L. monocytogenes*.

Phase 2 of the *L. monocytogenes* risk based verification testing program will initiate routine *L. monocytogenes* risk based testing of food contact and environmental (non-food contact) surfaces concurrent with product testing. CSIs will not conduct the sampling under the new RLM program.

New Testing Programs

The new RLM testing program consists of the following sampling projects:

1. RLMCONT – the routine risk-based testing of surfaces that have direct contact with RTE product in the RTE production area, e.g., conveyor belts, cooler storage racks, luggers, slicers, peelers, loaders, table tops;
2. RLMENVR – the routine risk-based testing of environmental (non-food contact) surfaces in the RTE production areas, e.g., floors, drains, walls, air-vents, overhead structures; and
3. RLMPROD – the routine risk-based testing of intact product samples collected concurrently with food and environmental contact surface swabs throughout the selected production shift.

VI. CSI RESPONSIBILITIES FOR VERIFYING COMPLIANCE WITH 9 CFR PART 430

CSIs, using the appropriate 03 or 01 procedure code, are to verify that the establishment is meeting the requirements of the alternative that it has chosen. If the establishment produces different products using different alternatives, the CSI should verify that the establishment meets the requirements for the alternative selected for each of the post-lethality exposed RTE products the establishment produces.

If an establishment is producing post-lethality exposed products and has failed to meet the requirements of **any** of the applicable alternatives, the CSI should contact the District Office (DO) for the initiation of the appropriate enforcement action.

The establishment is not required to comply with 9 CFR Part 430 if the RTE products produced in the establishment are not exposed to the environment after the lethality step.

A. What are the regulatory requirements of 9 CFR 430.4(b)(1), Alternative 1?

*Use of a post-lethality treatment (which may also be the antimicrobial agent) that reduces or eliminates microorganisms on the product AND an antimicrobial agent or process that suppresses or limits the growth of *L. monocytogenes*.*

B. How do CSIs verify compliance with the requirements in Alternative 1?

To verify compliance, CSIs are to follow the methodology in FSIS Directive 5000.1, Revision 1 when seeking answers to the following questions and any necessary follow-up questions that CSIs may identify:

1. Is the post-lethality treatment (which may be an antimicrobial agent) incorporated in the HACCP plan?
2. Does the establishment have validation data for the post-lethality treatment in accordance with 9 CFR 417.5?
3. Is the establishment implementing the post-lethality treatment as described in the HACCP plan?
4. Has the establishment documented in its HACCP plan or its Sanitation SOPs or other prerequisite program the effectiveness of the antimicrobial agent or process in suppressing or limiting the growth of *L. monocytogenes*?
5. Is the establishment using the antimicrobial agent or process as described in its HACCP plan, its Sanitation SOPs, or a prerequisite program?

C. What are the regulatory requirements of 9 CFR 430.4(b)(2), Alternative 2?

*Use of either a post-lethality treatment (which may be an antimicrobial agent) that reduces or eliminates microorganisms on the product OR an antimicrobial agent or process that suppresses or limits the growth of *L. monocytogenes*.*

Choice 1 - An establishment that produces post-lethality exposed product that selects this alternative and chooses to use a post-lethality treatment (which may be an antimicrobial agent) that reduces or eliminates microorganisms on the product:

OR

Choice 2 - An establishment that produces post-lethality exposed product and that selects this alternative and chooses to use an antimicrobial agent or process that suppresses or limits the growth of *L. monocytogenes*.

D. How do CSIs verify compliance with the requirements in Alternative 2?

When verifying compliance with Alternative 2, CSIs are to seek answers to the questions from paragraph B. Alternative 2 is based on the same requirements as Alternative 1 **except** that the establishment can choose to just have a post-lethality treatment that meets the requirements of B. 1-3 above (Choice 1) **or** to

just use an antimicrobial agent or process to suppress or limit the growth of *L. monocytogenes* throughout the shelf life of the product that meets the

requirements of B. 4 above (Choice 2). **Also**, if the establishment chooses Choice 2, the CSI should seek answers to the following questions and any necessary follow-up questions that the CSI may identify:

Does the establishment's testing of food contact surfaces to verify the on-going effectiveness of its sanitation procedures:

1. provide for testing of food contact surfaces in the post-lethality processing environment to ensure that the surfaces are sanitary and free of *L. monocytogenes* or of an indicator organism?

2. identify the conditions under which the establishment implements hold-and-test procedures following a positive test of a food-contact surface for *L. monocytogenes* or an indicator organism?

NOTE: If CSIs have questions regarding the validation data, they should contact the Technical Service Center (TSC) or an EIAO through supervisory channels.

3. state the frequency with which testing is done?

4. identify the size and location of the sites that are sampled?

NOTE: If CSIs have questions regarding the validation data, they should contact the TSC or an EIAO through supervisory channels.

5. include an explanation of why the testing frequency is sufficient to ensure that effective control of *L. monocytogenes*, or an indicator organism, is maintained?

NOTE: If CSIs have questions regarding the validation data, they should contact the TSC or an EIAO through supervisory channels.

E. What are the regulatory requirements of 9 CFR 430.4(b)(3), Alternative 3?

Use of sanitation measures only.

F. How do CSIs verify compliance with the requirements in Alternative 3?

To determine compliance, CSIs are to seek answers to questions that include the following and any necessary follow-up questions that CSIs may identify:

Does the establishment that produces post-lethality exposed product and that selects this alternative have on-going verification testing procedures of food

contact surfaces that are designed to:

1. have sanitation measures incorporated in its HACCP plan or Sanitation SOP or other prerequisite program?
2. test food contact surfaces in the post-lethality processing environment to ensure that the surfaces are sanitary and free of *L. monocytogenes* or of an indicator organism?
3. identify the conditions under which the establishment implements hold-and-test procedures following a positive test of food contact surfaces for *L. monocytogenes* or an indicator organism?
4. state the frequency with which the testing is done?
5. identify the size and location of the sites that are sampled?
6. include an explanation of why the testing frequency is sufficient to ensure that effective control of *L. monocytogenes*, or of an indicator organism, is maintained?

NOTE: If questions regarding the validation data, they should contact the TSC or an EIAO through supervisory channels.

Also, does an establishment producing a deli product or a hotdog product:

1. verify that corrective actions it implemented with respect to sanitation after an initial positive test for *L. monocytogenes* or an indicator organism on a food contact surface in the post-lethality processing environment are effective by follow-up testing that includes a targeted test of the specific site on the food contact surface area and other sites as are necessary to ensure the effectiveness of corrective actions?
2. hold lots of product, during follow-up testing, if the establishment obtains a second positive test for *L. monocytogenes*, or an indicator organism for product that may have become contaminated by contact with the food contact surface until the establishment corrects the problem indicated by the test result?
3. sample and test the lots for *L. monocytogenes* or an indicator organism using a sampling method and frequency that provides a level of statistical confidence that ensures that each lot is not adulterated with *L. monocytogenes*, in order to release into commerce the lots of product that may have been contaminated with *L. monocytogenes*?
4. document the results of the testing?
5. rework the held product using a process that is destructive of *L.*

monocytogenes?

G. How do CSIs document noncompliance?

If the answers to any questions in B, D, or F above or similar questions are “no”, CSIs are to issue a Non-compliance Record (NR) under the appropriate 03 or 01 procedure code as described in FSIS Directive 5000.1, Revision 1 and reference 9 CFR 430.4(b)(1), (2), or (3) and the appropriate sections of 9 CFR 417 or 416, if applicable. CSIs are to verify that the establishment takes corrective action to bring itself into compliance with 9 CFR Part 430. Such actions may include a reassessment of the HACCP plan and the establishment’s choice of another alternative or a determination that the decisions made in the hazard analysis regarding the use of a prerequisite program remain valid.

VII. CSI RESPONSIBILITIES IN VERIFYING 9 CFR OF 430.4(e)

A. What are the regulatory requirements of 9 CFR 430.4(e)?

*An establishment that controls *L. monocytogenes* by using a post-lethality treatment or an antimicrobial agent or process that eliminates or reduces, or suppresses or limits the growth of the organism may declare this fact on the product label provided that the establishment has validated the claim.*

B. How do CSIs verify compliance with this regulatory requirement?

The CSI should verify that the establishment’s records demonstrate that the labeling claim is accurate, that the establishment has data to support the claim, and that the establishment has a sketch label approval on file.

If the establishment does not have data to support the claim, the CSI should document the noncompliance on an NR using the appropriate HACCP procedure code and referencing 430.4(e) and 417.5(a).

NOTE: If CSIs have questions regarding the validation data, they should contact the TSC or an EIAO through supervisory channels.

VIII. CSI RESPONSIBILITIES FOR COLLECTING SAMPLES OF RTE PRODUCTS UNDER THE RTE PROJECT CODES ALLRTE AND RTE001

NOTE: The Agency, in an effort to allocate resources effectively for sampling, is discontinuing the RTERISK1 sample project effective immediately. The Agency will continue to sample under RTE001 (see attachment) and ALLRTE (see FSIS Directive 10,210.1, amendment 6) sample projects.

A. How Do CSIs Collect Samples of RTE Products for the RTE001 and ALLRTE Sampling Projects?

1. The CSI is to collect a RTE product sample within the sampling window timeframes denoted on FSIS Form 10,210-3, Requested Sample Programs, from the Office of the Chief Information Officer, Data Systems Management Division (OCIO-DSMD).

2. Product samples taken at an establishment should come from only one sampling project during any given timeframe, regardless of who is collecting the samples, in the following priority: RLMPROD, RTE001, or ALLRTE. If a sample is not collected, the CSI is to check the appropriate code in block 33 on the unused form. If code 53 is checked, briefly describe in block 33 the reason why the sample was not collected and return the unused form to the laboratory identified in block 9.

3. If a specific product is not pre-selected for sampling in Block 18 of the sample request form, the CSI should sample product using the instructions in the attachment for the RTE001 project code or FSIS Directive 10,210.1, Amendment 6, for the ALLRTE project code.

4. Safeguard the security of samples during preparation, storing, packaging, and submission for testing (See FSIS Directive 7355.1, Revision 2).

5. Follow the directions in FSIS Directive 10,200.1 for obtaining test results through the LEARN System. CSIs should provide this information to establishment management even if the establishment receives e-mail notifications from OCIO-DSMD.

IX. CSI RESPONSIBILITIES REGARDING ENFORCEMENT FOR POSITIVE SAMPLE RESULTS

A. RLM Sampling Program

The CSI should document an NR based on the determinations of the EIAO/Public Health Veterinarian (PHV) assessment for positive sample results from the RTE RLM sampling program. Per the EIAO training, the recommendation by the EIAO should not include both recommending an enforcement action (e.g., NOIE or Suspension) and issuing an NR for a noncompliance written by a CSI. The CSI should issue an NR under the appropriate 03 code using the verification trend indicator and referencing 9 CFR 417.4(a) and 301.2 or 381.1 for product or food contact surface results.

Note: An NR may be issued under the 06D01 procedure code using the product-based trend indicator and referencing 9 CFR 416.4(b) when a positive environmental sample result supports that the establishment has not met the requirement of preventing the creation of insanitary conditions.

B. RTE001 and ALLRTE Sampling Projects

If the CSI collects a RTE product sample under the RTE001 or ALLRTE

sampling projects, then the CSI should make the following determinations regarding adulteration based on the circumstances:

1. If any RTE product sample collected by the CSI under the RTE001 or ALLRTE sampling projects (after pre-shipment review) tests positive for *L. monocytogenes*, product in the sampled lot is adulterated.

a. The CSI should issue an NR using the appropriate 03 procedure code and the verification trend indicator referencing 9 CFR 417.4(a) and 301.2 or 381.1.

b. The CSI should contact the District Recall Officer (DRO) following the directions in FSIS Directive 8080.1, Revision 4, Amendment 3, if any adulterated product in the sampled lot has entered commerce.

C. CSI Responsibilities Regarding Establishment Testing

1. Product and food contact surface testing

When an establishment does its own sampling of product for *L. monocytogenes*, the product represented by the sample is adulterated if:

a. the sample of RTE product is positive, or

b. there is a positive result for a post-lethality RTE food contact surface if no subsequent and adequate post-lethality treatment was applied to the product represented by the sample.

If the establishment held the affected product, CSIs are **not** to issue an NR unless the establishment fails to meet the requirements of 9 CFR 417.3 if *L. monocytogenes* is addressed in the HACCP plan or a prerequisite program, or the requirements of 9 CFR 416.15 and 417.3 if *L. monocytogenes* is addressed in the Sanitation SOPs.

2. Environmental Sampling

An establishment may or may not conduct environmental sampling, other than on food contact surfaces, under its HACCP plan or Sanitation SOPs or other prerequisite program. If the establishment is conducting such sampling, and positive results are received, CSIs are to verify that the establishment takes the appropriate action as outlined in the program under which the establishment did the sampling. If the establishment is conducting such sampling but is not addressing the sampling under HACCP or Sanitation SOPs or other prerequisite programs, and CSIs find that such sampling is resulting in repetitive positive results, CSIs are to notify the DO.

D. CSI Verification of Corrective Actions

When an FSIS RTE product sample or post-lethality exposed RTE food contact surface sample tests positive for *L. monocytogenes*, and there was no subsequent and adequate post-lethality treatment applied to the product represented by the sample, an NR is issued or an enforcement action is initiated and the establishment must bring itself into compliance with all applicable regulations.

If an establishment RTE product sample or a post-lethality exposed RTE food contact surface sample for which there was no subsequent and adequate post-lethality treatment applied to the product tests positive for *L. monocytogenes*, the product represented by the sample is adulterated, and the establishment must implement corrective actions that meet the requirements of 9 CFR 417.3, or 9 CFR 417.3 and 9 CFR 416.15.

1. As soon as possible after the establishment has implemented its corrective actions, the CSI should either:

a. perform the activities in the verification plan if an enforcement action was taken, or

NOTE: A verification plan is developed to assist the CSI in verifying the effectiveness of the establishment corrective measures. The verification plan lists the activities that inspection program personnel should perform as part of their inspection procedures to verify the effectiveness of the establishment's corrective measures. A verification plan is developed when a decision is made to defer enforcement following the issuance of a NOIE, or a decision is made to hold a suspension in abeyance following the suspension of the assignment of inspection program personnel that resulted for a FSA. The EIAO has the primary responsibility for preparing the written verification plan. However, the EIAO should work with the in-plant inspection team, including the Front-line Supervisor, in the development of the verification plan.

b. perform a HACCP 02 procedure for the specific production for a NR written for a FSIS sampling result that tested positive for *L. monocytogenes* and verify that the establishment implements corrective action that meets the requirements of 9 CFR 417.3 if *L. monocytogenes* is addressed in the HACCP plan or prerequisite program, or 9 CFR 416.15 and 417.3 if *L. monocytogenes* is addressed in the Sanitation SOPs.

2. CSIs are to verify the establishment disposition of the sampled product lot, by verifying that:

a. the establishment has documentation to support that potential contamination would be limited to individual production lines for individual products, and

b. the establishment has destroyed the sampled lot or has reworked the

sampled lot with a process that is destructive of *L. monocytogenes*.

3. If an establishment chooses Alternative 3, CSIs are to verify all the factors for the testing in Alternative 2, Choice 2 (see section VI. D). In addition, in establishments that produce a deli product or a hotdog product, CSIs are to verify the adequacy of how the establishment:

a. verifies that corrective actions that the establishment implemented with respect to sanitation after an initial positive test for *L. monocytogenes* or an indicator organism on a food contact surface in the post-lethality processing environment are effective by follow-up testing that includes a targeted test of the specific site on the food contact surface area where the positive was found,

b. holds lots of product that may have become contaminated by contact with the food contact surface during follow-up testing after the establishment obtains a second positive test. The CSI should seek answers to the following questions to assist in determining if all affected product has been held by the establishment:

i. has contamination of the product occurred after lethality?

ii. has product back to the last documented implementation of the SSOP been held?

iii. have ingredients or solutions (e.g. brine) been re-used in the process in the post-lethality environment?

iv. has the same equipment been used in the production of the product in the post-lethality environment?

v. has the product been exposed to product handling in the post-lethality environment?

c. samples and tests the lots of product that may have been contaminated with *L. monocytogenes* for *L. monocytogenes* or an indicator organism using a sampling method and frequency that provides statistical confidence that each lot is not adulterated with *L. monocytogenes* before releasing into commerce the lots of product that may have been contaminated with *L. monocytogenes*,

d. documents the results of testing

NOTE: The District Manager (DM) or designee should verify corrective and preventive measures by scheduling an Intensified Verification Testing. District Managers should contact OCIO-DSMD through the Sampling Forms – Headquarters mailbox to request the forms for the sampling. This sampling should not be initiated until the corrective and preventive measures have been put in place.

E. Disposition of Product Occurring Off-site

1. If the CSI determines that the product disposition is to occur off-site during verification of corrective actions, then the CSI is to verify that the establishment that produced the adulterated product maintains appropriate control of the product by conducting the following activities when performing an O2 procedure:

a. obtain the identity of the official establishment receiving the adulterated product or obtain the name and address of any renderer or landfill that receives the product;

b. notify, through e-mail, the contact person in the DO of the number of the establishment where the disposition is to occur or the name and address of the landfill operation or renderer. The District contact person notifies the District where the establishment that further processes the product, landfill operation, or renderer is located (if another District) that adulterated product is being transferred to that District.

c. for product being transferred to a landfill operation or renderer, verify that the establishment maintains control of the positive product while it is in transit (e.g., through company seals);

d. for product being transferred to an official establishment, verify that either 1) the establishment that produced positive product maintains control of the product while it is in transit (e.g., through company seals), or 2) the product moves under FSIS control (e.g., under USDA seal or accompanied by FSIS Form 7350-1); and

e. verify that records are available that show that the positive product received the proper disposition, including documentation evidencing proper disposal of the product from the official establishment, landfill operation, or renderer where disposition occurred.

NOTE: The HACCP O2 procedure at the establishment that produced the positive product cannot be completed for this specific production until the establishment has received documentation evidencing proper disposal from the official establishment where the disposition occurred or landfill operation or renderer where the disposition occurred to complete the corrective action and documentation requirements (9 CFR 417.3 or 416.15 and 417.3) and to complete the pre-shipment review (9 CFR 417.5(c)) of the corrective actions.

2. If the CSI finds noncompliance while verifying product disposition off-site for corrective actions, he/she is to document the noncompliance under the appropriate regulation 9 CFR 417.3 if *L. monocytogenes* is addressed in the HACCP plan or prerequisite program, or 9 CFR 416.15 and 417.3 if *L. monocytogenes* is addressed in the Sanitation SOPs. The CSI should contact the DO if the determination is made, or if questions arise about whether the establishment committed the prohibited act of selling or transporting adulterated

articles that have not been inspected and passed. The DO will investigate further.

Contact the Technical Service Center at (800) 233-3935 with technical questions.

A handwritten signature in black ink, appearing to read "Shirley Duffin".

Assistant Administrator
Office of Policy, Program, and Employee Development

FSIS Directive 10,240.4
Attachment

PROJECT CODE AND NAME	RTE001 - Risk-based Verification Testing of ONLY Post-lethality Exposed RTE Meat and Poultry Products
PRODUCT TO SAMPLE	<p>Select the highest risk post-lethality exposed RTE product produced at the time of collection</p> <ol style="list-style-type: none"> 1) Deli-meats that are sliced in the federal establishment 2) Deli-meats shipped whole from the federal establishment (this does not include cook-in-bag products; only those exposed post-lethality) 3) Hotdog Products 4) Deli salads, patés, and meat spreads 5) Fully cooked type products (other than cooked products in 1-4 above) 6) Fermented products 7) Dried products 8) Salt-cured products 9) Products labeled as "Keep Frozen" <p>NOTE: DO NOT sample the same lot of a product for more than one sample collection project (RLm, ALLRTE, and RTE001).</p>
ANALYZED FOR	<i>Listeria monocytogenes</i> AND <i>Salmonella</i> . If product is a dry or semi-dry fermented sausage or fully cooked meat patties, it will also be analyzed for <i>Escherichia coli</i> O157:H7.
SPECIAL COLLECTION INSTRUCTIONS	Randomly select a day, shift, and time within the sample collection time frame indicated in block 4 of the FSIS form 10,210-3. Collect enough INTACT product so that at least TWO pounds of meat or poultry is submitted to the laboratory for analysis. If an intact sample of the product is too large to submit to the laboratory, ask the establishment to slack fill or short weight a package to two pounds without any changes to its processing operations. If this is not possible, contact the laboratory to see if a larger shipping container is available.
SAMPLE REQUEST FORM	Complete part II of the 10,210-3 form. Blocks 19, 20, 22, and 28-32 are required . Place the sample request form and a copy of the label in a plastic bag and place the plastic bag into the shipping container with the sample. If no sample is collected, complete Block 33 and mail the form to the laboratory listed in Block 9.
SAMPLE SECURITY	Identify sample and seal shipping container per FSIS Directive 7355.1, Rev. 2.
SPECIAL SHIPPING INSTRUCTIONS	Ship AFTER product represented by the sample has passed pre-shipment review. Ship refrigerated or frozen, using sufficient frozen coolant to keep samples cold during transit. Ship samples Monday through Friday so that they arrive at the laboratory overnight. A sample box shipped on Fridays must have a Saturday Delivery sticker on it and Saturday delivery marked on the shipping label to avoid delivery delays and discarded samples. Do not ship samples on Saturdays or on the day before a Federal holiday.
REFERENCES	FSIS Directive 7355.1 Rev. 2