

Executive Summary

The Food Safety Inspection Service (FSIS) is providing additional policy guidance to its inspection force in the form of three revised Directives. Each Directive relates to our *E. coli* O157:H7 requirements and has ramifications for the regulated industry.

The first Directive, 5000.2 states FSIS will review plant food safety testing records at least once per week.

The second Directive, 6420.2 clarifies FSIS zero fecal tolerance policies and inspection verification methods. This Directive does not change the zero tolerance requirements for fecal material or the rate at which FSIS conducts fecal checks. It does combine the prior Directives into one document that covers both meat and poultry. It also identifies the verification methods that FSIS will use to determine noncompliance and record these results in a HACCP framework. Previous Directives used pre-HACCP methodology. In addition, this Directive clarifies that certain beef parts such as weasand, head and cheek meat are also subject to the zero tolerance provisions.

The third Directive 10,010.1, Revision 1 lays out specific verification activities that FSIS inspection personnel will use to gather raw beef samples to be tested for *E. coli* O157:H7 in plant, at retail and in import facilities. These methods incorporate a previous FSIS Notice on Supplier Notification.

The Directive covers sampling methodology and submission. It addresses actions to be taken when a sample is a presumptive positive and methods to apply when a sample is confirmed positive for *E. coli* O157:H7. The instructions also cover supplier notification, verification methods, enforcement and corrective action requirements. Control of product in transit and follow-up sampling guidance for product testing positive at a specific plant, raw ground product supplied to another establishment or retail store producing raw ground product are included. Imported product testing, follow-up and enforcement activities are addressed.

The Directive addresses two types of labeling that can be used for product moving between official establishments. The first is an instructional statement. This addresses how the product should be prepared or handled to assure that *E. coli* O157:H7 is reduced to undetectable levels or eliminated. Two examples would be “for lethality treatment” or “for cooking only.” The second type of label is a disclaimer statement. These are statements regarding what a plant has **not** done to address the pathogen. An example would be “product that has not been tested for *E. coli* O157:H7.” If a disclaimer statement is used, the receiving plant must address *E. coli* O157:H7 in their HACCP plan. Both these statements can only be placed on product if they have been approved by FSIS.

The Agency feels that these new policies and methods will enhance consumer protection and clarify inspection program personnel’s responsibilities.