TEXAS Health and Human Services

Texas Department of State Health Services

Jennifer A. Shuford, M.D., M.P.H.
Commissioner

December 2023

Texas Supplemental Industry Guide Addressing Shiga Toxin-Producing Escherichia Coli in Raw Non-Intact Beef Processing and Requirements for Ongoing Verification

Background:

The Texas Meat and Poultry Inspection program has developed this Supplemental Industry Guide that Texas state inspected establishments may utilize in conjunction with the FSIS Industry Guideline for Minimizing the Risk of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef (including Veal) Processing Operations to meet requirements for ongoing verification as well as to make decisions in their HACCP systems.

Methods:

The information below is intended to help Texas state-inspected establishments decide how to meet ongoing verification requirements. It is not intended to tell establishments that they must utilize a solution below, as there may be other acceptable solutions.

a) If an establishment determines the presence of STEC is reasonably likely to occur in their product:

   1) The establishment **must** address STEC with a Critical Control Point (CCP) in their HACCP system and develop a HACCP plan in accordance with 9 CFR 417.2(b)(1).

      NOTE: If the establishment elects to control STEC with a CCP that involves application of an effective antimicrobial, the establishment must maintain records of appropriate mixing and application of the antimicrobial.

   2) The establishment must also conduct ongoing verification to support the efficacy of their CCP in accordance with 9 CFR 417.4(a)(2). The establishment may elect to conduct ongoing verification by through sampling by either of the following:

(A) Taking their own samples for analysis by a certified lab. If the establishment elects to utilize this approach to support their frequency for verification, they could analyze either at least the number of surveillance samples scheduled by MSA in that year or the minimum number of samples appropriate for their establishment based on the FSIS Industry Guideline for Minimizing the Risk of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef (including Veal) Processing Operations.

(B) Maintaining records of sample results from regulatory samples taken by the program for the current year and the previous year.

i. To support their frequency of verification, the number of regulatory sample results maintained by the establishment should mirror the required number of samples scheduled by the Program for one year based on the establishment's production volume. These values can be found in MSA Directive 10,010.1.

NOTE: It is acceptable for establishments that did not produce raw non-intact beef products during the previous year to maintain sample results from the current year only.

3) Establishments may wish to fully consider the decision to declare STEC reasonably likely to occur as this may be considered an admission of utilizing adulterated source material by some entities. Additionally, CCPs that fall short of being considered a "lethality" treatment may be deemed inadequate to eliminate the risk of STEC in adulterated product by some entities.

b) If an establishment determines <u>STEC is not reasonably likely to occur</u>, that determination must be adequately supported in accordance with 9 CFR 417.5(a)(1). Some examples of how an establishment may choose to support that determination are:

1) Establishments may choose to utilize Certificates of Analysis (COAs) or Letters of Guarantee (LOGs) from source material suppliers combined with appropriate application of an effective antimicrobial.

A. If the establishment utilizes the antimicrobial under a prerequisite program and bases part of their decision that STEC is not reasonably likely to occur on that antimicrobial application, the establishment must:

i. Keep records of appropriate mixing and application of the antimicrobial.

ii. Conduct ongoing verification to support the efficacy of their prerequisite program. The establishment may elect to conduct ongoing verification through sampling by either of the following:

I. Taking their own samples for analysis by a certified lab. If the establishment elects to utilize this approach to support their frequency for verification, they could analyze either at least the number of surveillance samples scheduled by MSA in that year or the minimum number of samples appropriate for their establishment based on the FSIS Industry Guideline for Minimizing the Risk of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef (including Veal) Processing Operations.

II. Maintaining records of sample results from regulatory samples taken by the program for the current year and the previous year.

a) To support their frequency of verification, the number of regulatory sample results maintained by the establishment should mirror the required number of samples scheduled by the program for one year based on the establishment's production volume. These values can be found in MSA Directive 10,010.1.

b) It is acceptable for establishments that did not produce raw non-intact beef products during the previous year to maintain sample results from the current year only.

B. If the establishment utilizes an effective antimicrobial as a processing aid, but does not consider it to be part of a prerequisite program, and does not base their decision that STEC is not reasonably likely to occur on the application of the antimicrobial:

i. The establishment is not obligated to keep records or conduct ongoing verification activities dealing with application of the antimicrobial, though they may elect to do so.

ii. The establishment must conduct ongoing verification that their purchasing requirements, supported by COAs or LOGs, are effective in preventing STEC.

I. The establishment may utilize recent sampling data from their source material suppliers as ongoing verification. That ongoing verification activity should be performed at a frequency at least equal to the minimum frequency appropriate for the establishment as detailed in the FSIS Industry Guideline for Minimizing the Risk of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef (including Veal) Processing Operations. Those records should be available for review by program personnel.

II. The establishment may also elect to conduct ongoing verification through sampling by either of the following:

a) Taking their own samples for analysis by a certified lab. If the establishment elects to utilize this approach to support their frequency for verification, they could analyze either at least the number of surveillance samples scheduled by MSA in that year or the minimum number of samples appropriate for their establishment based on the FSIS Industry Guideline for Minimizing the Risk of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef (including Veal) Processing Operations.

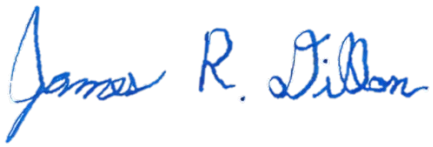
b) Maintaining records of sample results from regulatory samples taken by the program for the current year and the previous year.

1) To support their frequency of verification, the number of regulatory sample results maintained by the establishment should mirror the required number of samples scheduled by the program for one year based on the establishment's production volume. These values can be found in MSA Directive 10,010.1.

2) It is acceptable for establishments that did not produce raw non-intact beef products during the previous year to maintain sample results from the current year only.

Questions:

Please refer all questions through your supervisory channels.



James R. Dillon, DVM, MPH
Director, Texas State Meat and Poultry Inspection Program
Department of State Health Services