

National Advisory Committee on Meat and Poultry Inspection
September 28, 2021

Subcommittee II: Stuffed Not Ready- to-Eat Poultry Products

CHARGES: FSIS asked the Committee to consider actions FSIS should take to prevent and reduce illnesses associated with the handling or consumption of frozen, raw, stuffed not ready-to-eat (NRTE) poultry products, which may be breaded and par-fried and may appear ready-to-eat (RTE) to consumers

A. Given FSIS' consumer research findings and an open multistate *Salmonella* Enteritidis illness outbreak, should FSIS re-verify that companies continue to voluntarily label these products as raw in several places on the label and include validated cooking instructions?

- The subcommittee supports FSIS re-verification of labeling and the validation of cooking instructions for the category of products identified in the recent consumer research findings and open illness outbreak.

In addition, the subcommittee recommends the agency:

- Update guidance to industry to recommend best practices for labeling NRTE breaded, stuffed, boneless poultry products.¹ This update should include:
 - Appropriate language to warn consumers not to use microwaves and air fryers if validated instructions are not provided for these methods.
 - Language instructing consumers not to use cooking methods for which instructions are not provided on the package.
 - The instruction to cook the product to a minimum of 165 degrees as measured using a meat thermometer.
- Enter the re-verification into the Public Health Information System (PHIS) as a task for the inspectors to pull periodically.
- Further investigate the labeling of the product involved in the most recent outbreak, which occurred after voluntary labeling was instituted, to identify potential factors that might contribute to consumers mis-identifying the raw product as ready-to-eat, such as the product image.
- Consider whether specific guidance is warranted for non-stuffed, uncooked, breaded, boneless poultry products.

B. What, if any, actions can FSIS take to prevent and reduce illness associated with the handling or consumption of these NTRE products? For example, should FSIS:

1. Conduct exploratory sampling for pathogen and/or indicator organisms in these and other similar raw, stuffed or non-stuffed partially processed products?

¹

https://www.fsis.usda.gov/sites/default/files/import/Labeling_Policy_Guidance_Uncooked_Breaded_Boneless_Poultry_Products.pdf

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- No consensus was reached by the subcommittee regarding the Agency conducting exploratory sampling for pathogens and/or organisms in the stuffed or non-stuffed partially processed products. Some members of the subcommittee believed that there was some value from an informational standpoint, but some members also expressed concern with the implications for Agency actions, and the determination of the actual ingredient that was a source of the bacteria. This resulted in a lack of agreement within the committee. The group discussed the redundancy and use of resources for sampling breaded products, in addition to the agency's current practice of sampling poultry parts.
2. Require establishments to apply a lethality treatment to ensure that all products are RTE?
- The committee did not believe that requiring a lethality treatment to ensure that all breaded poultry products are RTE was appropriate. Members of the subcommittee expressed concern that requiring lethality treatment would excessively limit consumer choice and limit companies producing the products, which lack equipment for a lethality step. Members also cited data from the recent FSIS consumer study suggesting that consumers could correctly identify the raw breaded poultry products as raw product.² However, the group discussed whether additional factors, such as the color and texture of the product, may result in some raw breaded products being more easily confused with RTE products.
3. Sample these products for *Salmonella* because consumers customarily undercook them?
- No consensus was reached by the subcommittee regarding the sampling of these products for *Salmonella*. The subcommittee felt this was very similar to the first question posed by the agency to the group, with more specificity for the pathogen and without reference to other product categories. It was discussed that any sampling done be exploratory, due to implications for FSIS actions and potential complications for which ingredient could be the source of the pathogen. Members of the subcommittee also noted that current FSIS sampling for raw parts, carcasses and comminuted poultry meat is conducted under a performance standard, with the pathogen not considered to be an adulterant.
4. Require establishments that produce these products to reassess their HACCP plans in light of outbreak data?
- The subcommittee recommends that establishments producing similar products as in the current outbreak (i.e. NRTE stuffed, breaded poultry products) should be required to reassess their HACCP plan in light of information gained from the

² https://www.fsis.usda.gov/sites/default/files/media_file/2021-04/fscrp-yr3-nrte-final-report.pdf

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outbreak. The subcommittee also reviewed the label involved in the current outbreak and noted that the label pictured on the meat appears cooked, but also identified other factors that may have contributed to the outbreak, such as the increase in consumers cooking at home as a result of the COVID-19 pandemic.

In light of this, the subcommittee further recommends that:

- USDA conduct an assessment of outbreak information for any common themes over all the outbreaks involving raw breaded poultry products, including the appearance of the product and whether the color and texture of the meat plays a role in consumer confusion.
- 5. Conduct targeted consumer outreach? If so, please provide some ideas on the best approaches.
 - The subcommittee strongly encourages targeted consumer outreach regarding these types of products and recommends social media as an excellent method for this communication. The subcommittee further recommends that:
 - FSIS review consumer research data and provide guidance to industry on labeling practices to better attract consumers' attention to the raw nature of these not-ready-to-eat breaded poultry products.
 - Gather additional information on the demographics of consumers who purchase this type of product in order to target education towards these consumers, including by consulting with the members of industry that produce these products.
 - Include in the consumer outreach pictures to help illustrate current methods for such practices as placement of a thermometer for determining if the product is fully cooked. The subcommittee encourages USDA to carefully review the pictures to ensure they demonstrate correct, current best practices for food safety.
 - Include a link for breaded, stuffed poultry products on the FSIS consumer-focused webpage.

In addition to responding to specific questions, the committee has the following additional recommendations for FSIS to prevent and reduce illnesses associated with the handling or consumption of frozen, raw, stuffed NRTE poultry products:

- The subcommittee is aware of a petition submitted in 2016 by the National Chicken Council requesting that FSIS adopt requirements for the labeling of raw, stuffed chicken products and publish a compliance guidance explaining how to validate cooking instructions for such products. The subcommittee agrees that mandatory labeling requirements would be appropriate, and that these requirements should specify a minimum font, appropriate pictures and provide

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for consistency for labeling across the product category. Therefore, the subcommittee recommends that FSIS adopt mandatory labeling requirements for this product category. The subcommittee also recommends that FSIS publish a compliance guidance on validating cooking instructions for these products.

- The subcommittee strongly encourages FSIS to gather additional data on products within this category that may pose more confusion for consumers and determine the need to make adjustment to the processing of those specific products.