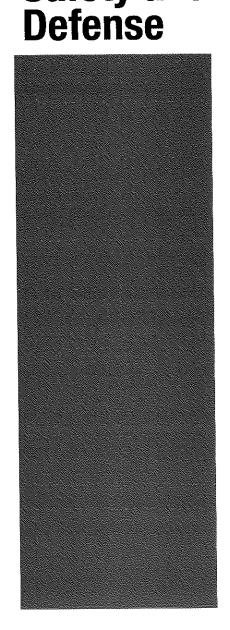
### Sample Ground Meat Record for Retail Stores

February 2013







### Sample Ground Meat Record for Retail Stores

USDA Food Safety Inspection Service (FSIS) is in the rulemaking process to regulate practices for sanitation and recordkeeping in retail stores related to meat grinding. USDA requires that retailers maintain records to identify each lot of ground meat prepared at the store. A description of all source materials used in grinding, including trim, is expected by the agency.

In January 2012, FSIS posted the document "Sanitation Guidance for Beef Grinders" on the website. As part of the guidance, they provide a sample table requesting detailed information on beef ground at retail.

FMI has prepared a simple chart on the following page that contains the required information for USDA. Feel free to use this chart if you have not implemented recordkeeping procedures or would like to modify your existing chart.

Along with recordkeeping, proper sanitation, employee training and hygiene, and control of product carry-over are all essential management tools.

Contact the FMI Department of Food Safety Programs at 202-220-0661 for assistance or questions.



# Sample Ground Meat Record for Retail Stores

	Time Equipment Cleaned & Sanitized (either before or after batch)				
<u></u>	Quantity Ground (in batch)				
Store Production Date:	Retail Label (name of product on retail label)				
Sto	Lot Number of Product from Supplier				
	Establishment Number of Supplier				
	Source Material Pack Date or Use by Date (from supplier label)				
Store Name:	Source Product Ground (Trim, chub, cut, etc)				

Supervisor:

Employee: \_

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### Comprehensive Guide Meat Ground at Retail Recordkeeping and Sanitation June 2013

### Background:

On January 6, 2012 the U.S. Department of Agriculture (USDA), Food Safety Inspection Service (FSIS) posted "Sanitation Guidance for Beef Grinders" on their website which should be carefully reviewed. FSIS is planning on issuing rulemaking in the near future which will regulate practices for sanitation and recordkeeping in retail stores. Maintaining records on meat ground at retail has remained both an issue of concern by regulators, as well as a challenge for some retailers, and recent food safety recalls and field inspection activities have raised the issue for more immediate action. FSIS has been very direct and persistent about issuing a proposed rule requiring recordkeeping at retail for grinding meat.

Twice yearly, the federal agencies publish a regulatory agenda with a list of the rules that they plan to publish. In the most recent regulatory agenda released on December 21, 2012, this entry appeared for a proposed rule from FSIS "Records to be Kept by Official Establishments and Retail Stores That Grind or Chop Raw Beef Products (Grinding Logs)."

The reason that FSIS is strongly pursuing required recordkeeping is to protect public health. If there are illnesses linked with products, FSIS investigates the source of the contamination. If meat from multiple suppliers is used and no or limited records are maintained, the investigation stalls at the retail store and the supplier and often the potential hazard cannot be identified. In some cases, this uncertainty can be the difference between recalling product from one day or product from several months.

In a recent outbreak, there was significant media and congressional pressure on USDA asking them to explain why records were not available. Since USDA already has statutory and regulatory authority, they have publicly stated that they are going to address a perceived gap in recordkeeping at retail, and will likely do that by issuing a proposed and then a final rule regulating the recordkeeping process.

### **USDA** Authority:

FSIS has the authority to require records and access to records under 21 USC 642 (a)(2) and regulations 9 CFR 320.1 (b)(1)(i), 9 CFR 320.1 (b)(1)(ii), and 9 CFR 320.1 (b)(1)(iv).

### Recordkeeping at Retail:

According to FMI surveys, over three quarters of FMI members maintain records on the meat products ground at retail. The level of detail in the records varies and the

individual data points vary, but the majority of retailers reporting to FMI maintain these records.

In "Sanitation Guidance for Beef Grinders" FSIS provides sample logs requesting the following information:

Store Name

Store Address

**Employee Name** 

Today's Date:

Time of Grind

Lot/Batch Number

Exact Name/Type of Product Produced

Package Size of Product Produced

Amount (in pounds) of Product Produced

Production Code of Product Produced

Manufacturer, Name of Source Material Used for Product Produced

Supplier Lot Numbers, Product Code and/or Pack Date of Source Material Used Establishment Information from Label of Source Product Used (Est #, phone #,

contact info)

Grinder Cleaned and Sanitized Between Source Materials? If Y, Date and Time

Comments

According to the FMI survey, the most commonly recorded items on logs were:

**Date Ground** 

Product Ground

Establishment number of supplier

Quantity (in pounds) of product being ground

Supplier Name

Supplier Date

Lot Number

Time Grinder Cleaned

Time Product Ground

Employee at Retail (initials)

### **Basic Regulatory Requirements**

### Cleaning and Sanitation of Equipment:

The FDA Food Code requires all food contact surfaces be cleaned at least every four hours. The food code allows for cleaning less frequently than every four hours if the utensils and equipment are held in a refrigerated room and cleaned according to the frequencies provided in the food code. <u>Section 4-602.11</u>

FSIS expects sanitation standard operating procedures (SSOPs) to be developed that address the cleaning of food contact surfaces, equipment, utensils, implements, and the processing areas. FSIS expects for the SSOPs to specify how frequently everything will be cleaned and include a verification procedure for cleaning.

### **Employee Training and Employee Health and Hygiene:**

Proper training of all employees with access to the meat case, packaging area, and grinding areas is essential. Only properly trained employees should be allowed to work in the meat department, handle meat, and operate equipment.

The Food Code and/or local and state regulations have requirements for employee health and hygiene including illness procedures, and policies for handwashing, proper clothing, coverings, hair restraints, gloves, etc. Make sure all regulations are followed by all retail employees.

Importance of "Breaks" in the Production Cycle:

Breaks in the production cycle are critical and should not be overlooked. A break in the production cycle is a combination of a complete cleaning and sanitation step in conjunction with no carryover of product. This can be the difference between recalling product from one day or product from several months.

Documenting cleaning and sanitatizing is imperative. Documentation can be done on the same records as the meat grinding records or on separate records.

Importance of Avoiding Carryover:

The second very important factor is to process carryover or discard it. If product cannot be processed on a daily basis, have a plan for using it up every two days, or three days, or worst case weekly in order to limit exposure should there be a recall. If the equipment is cleaned, and product is carried over to the next day, those two days of production are now linked. If this is done day after day, there is no break in production and the entire product becomes one huge lot. This can lead to rolling recalls and there are many examples in the meat industry of months of product being recalled because of carryover and no breaks in production. There are also examples of very small recalls because of clean breaks and appropriate recordkeeping.

### **Lessons Learned:**

In the case of outbreak investigations, a few practices make it very difficult to piece together information and can halt investigations. Examples of these include:

- Product from several suppliers combined in the grinder and not recorded
- Trim mixed with other product and not recorded, for example bench trim mixed with chubs and not recorded
- Supplier name recorded but no other identifying information such as the establishment number which is a true identifier. (Many suppliers have similar names)
- Incomplete or inaccurate forms
- Carryover and no true breaks in the production cycle

Lotting at Retail:

The package produced at retail must be linked with the "lot" of ground product. The simplest way to do this is by placing an identifiable code, product name and date on the product label that links the package to the lot of meat ground for which there is a record. The lot should have a supportable definition and should link the packaged product to the source material. Some companies will have several lots a day because they clean and sanitize frequently, and some will only have one lot a day. Most companies are producing multiple types of ground product throughout the day that should be labeled differently but the true lots run from sanitation cycle to sanitation cycle because those have a break in the production cycle and minimal chance of contamination between lots.

### **Product Handling Practices:**

- Grind chubs or tubes first and start with the highest lean percentage.
- Other products such as store-generated trimmings should be ground at the end
  of the grinding session and segregated from other products (some companies
  grind first thing in the morning; and clean and sanitize before and after grinding
  trim). The goal is to separate trim from other products and to have it be as small
  of a lot as possible.
- Rotate supply first-in first-out and pay attention to sell-by dates
- Avoid mixing species unless intentional and clearly labeled. Clean and sanitize equipment between species.
- Store trim in clean and sanitized lugs and hold under refrigeration.
- Properly label all trim lugs with the primal source, date, time and employee

### Best Practices

### **Examples of Best Practices**

- Best Practices in Product Handling
  - Avoid mixing products from different suppliers
  - o Avoid mixing chubs and trim
  - Avoid grinding re-work or pull-backs (if they are ground, make sure they are separated from other product and clearly documented in the records)

### Electronic Recordkeeping

Most retailers are maintaining records on meat ground at retail and some have moved from paper records to electronic records. Meat suppliers are placing scanable barcodes on boxes. When the meat is ground, the barcode is scanned and this information goes to a central database. The accuracy of the information is much better than paper records and the speed of retrieving information is much faster. However, the capital costs are higher. Companies using the technology are very encouraged with the results and no one seems to be returning to a paper based system. This may also have additional benefits for other labeling/tracing requirements.

### Managing Trim and Higher Risk Products

USDA considers bench trim from primals, subprimals, and boxed beef higher risk products and directs USDA inspectors to collect samples during the surveillance activity (FSIS Directive 8010.1 Rev 3). Managing trim can be challenging and takes some extra work, but is necessary to protect public health and reduce risk. Some retail companies have stopped using trim and only grind chubs. If trim is ground, it needs to be carefully handled, properly recorded, ground in limited lots and labeled.

### Managing Carryover

 Many companies have developed a system for either eliminating carryover on a daily basis, or running carryover first thing in the morning, and following the run with a cleaning and sanitation step. If carryover is not managed, it can expand the scope of a recall even with documented sanitation steps.

- Clean and Sanitize As Needed, even if more frequent than every 4 hours
  - Many companies are cleaning and sanitizing at the following frequencies: throughout the day, between each run, between each species change, before and after grinding trim; and companies are breaking the product into lots between the cleaning and sanitizing steps. It is a proactive way to manage product, reduce liability and link product to records.

### Reasons to Maintain Records

- 1. Required by USDA
- 2. Assists in an investigation and helps to identify problems faster and therefore protect public health
- 3. Reduces risk of having a recall at retail
- 4. Reduces liability in case of a food safety issue
- 5. Reduces publicity in case of a food safety issue
- 6. Reduces amount of product recalled and financial burden

Contact the FMI Department of Food Safety Programs at 202-220-0661 for assistance or questions.

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### Sanitation Guidance for Beef Grinders

1. Good sanitation prevents the introduction of new bacterial hazards to controlled ingredients.

The objective of a beef grinder is to maintain the clean condition of the carcass, primal, subprimal, or coarse ground beef starting material.

- a) The grinder should develop sanitation standard operating procedures (SOPs) that address, at a minimum, the cleaning of food contact surfaces, equipment, utensils, implements, and the processing areas. The SOPs should indicate the frequency with which these items will be cleaned and how the grinder will verify their cleanliness.
- b) Systematic sanitizing of belts and implements is recommended, as it will break the chain of any contamination that slips through. Thus, rather than the contaminant being spread throughout the lot, it will be stopped or at least diminished.
- c) Employees are in continuous contact with the product. Therefore, sanitation training and education, as well as supervision, are crucial. Keeping the processing areas clean and in good repair and keeping employee areas clean and in good repair set a personal tone for the operation. These are management choices, but can indirectly affect the product.
- d) Desirable practices to instill in employees are:
  - 1) Removing outer clothing when leaving the processing area.
  - 2) Practicing personal hygiene, such as proper handwashing after using the toilet or before entering the processing area.
- 2. Sanitation procedures should prevent cross-contamination from equipment, personnel, traffic, air flow, tables, and floors to product.
- 3. Additional resources:

Guidance for Beef Grinders and Suppliers of Boneless Beef and Trim Products: Guidance for Beef Grinders and Suppliers of Boneless Beef and Trim Products

Best Practices for Raw Ground Products:

http://www.fsis.usda.gov/PDF/Best Practices Raw Ground Products 08.pdf

FSIS Sanitation Performance Standards Compliance Guide:

http://www.fsis.usda.gov/Regulations & Policies/Sanitation Performance Standards/index.asp

Store Name: Store Address:

## FRESH GROUND BEEF PRODUCTION LOG/TRACKING LIST

	Comments										
	Grinder	Cleaned and	Sanitized	Between	Source	Materials? If	Y, Date and Time				
Today's Date:	Establishment	Information from	label of Source	Product Used	(Est. #, ph #,	contact info)					
	Supplier Lot	Numbers, Product	Code and/or Pack	Date of Source	Material Used			. 23			
	5			for Product							
	Production	Code of	Product	Produced							
	Amount (in	po (spunod	Product	Produced							
	Package	Size of	Product	Produced							.f 14 24
	Exact	Name/	Type of	Product	Produced						
e Name:	Lot/	Batch	Number	(lot = same	sonrce	material)					
Employee Name:	Time of	Grind									

Date

Signature of Store Management Reviewer

NEW WAVE STORE 123 Main Street Anytown, USA, Zip Code

### Employee name: John Williams

FRESH GROUND BEEF PRODUCTION LOG/TRACKING LIST

Today's Date: 12/14/11

							The state of the s			
Time	i ot/	Exact	Package	Amount	Production	Manufacturer,	Supplier Lot	Establishment	Grinder	Comments
) till t	Batch	Name/		Ę	Code of	Name of Source	Numbers,	Information	Cleaned and	
	Nimber	Type of		oounds) of	Product	Material Used	Product Code	from label of	Sanitized	
2	(lot = como	tribord tribord	Draduced	Product	Produced	for Product	and/or Pack	Source Product	Between	
	tion = saille	Droducod		Produced		Produced	Date of Source	Used	Source	
	an inos	בו מממככמ		5			Material Used	(Est. #. ph #.	Materials? If	
	material)							contact info)	Y, Date and	
									Time	
0700-	1 of 001	91/9		1,250 lbs	121511-01	Boneless	BB120311USA	Est. 00321		Cleaned
1000	1	New N		total of	NWGB;	Chuck,	Packed on	M, (202)-123-		and
		Wave	retail	91/9		twenty-one 60	12/03/11;	4567, 898		sanitized
		Ground		Ground	-	lb boxes from	BB120411USA	Dodge St,		grinder
		S S S S S S S S S S S S S S S S S S S		Chuck		USA Beef	Packed on	Omaha, NE,		after Lot
		, 5 5 5				Company	12/04/11	68104		001
1030-	1 of 002	70/30	2 h.	50/2 lb.	121511-03	USA Company	1USA	Est. 00321		Used trim
1130	From	New New	Travs	travs	NWGB:	•	_	M, (402)-123-		from two
Z MA	store-	Wave	2		sell-bv			4567, 898		different
-	generated	ground .			date		BB120711USA	Dodge St,		production
	Pond Pond	Reef			12/20/11	-	Packed on	Omaha, NE,		lots from
	trim .	}					12/07/11;	68104		USA
	came	came	Same	Same	same	National Brand	NBB120111,	Est. 15555 M,		Used trim
	3	2	}			Beef	Packed on	(603) 666-		from only
							12/01/11	5454, 220		one
								Locust St,		production
								Denton, TX		lot of NBB
								76201		product

### **Examples of Good Records**

### Good records include:

- 1. Producing store name
- 2. Address
- 3. City/state/zip
- 4. Date of each lot of store ground product produced, where a lot is defined as all identically labeled product produced from full equipment clean-up to clean-up
  - 5. Exact name/type of store ground product
  - 6. Amount of each lot of store ground product
  - 7. Sell by/use by date and/or production code of each lot of store ground product
  - 8. Other information used to identify store ground product
- 9. Full name(s) and product code(s) of all source products used to formulate each lot of store ground product
- 10. All Federal or State Establishment numbers of each source product contained in each lot of store ground product
  - 11. Each source product sell by, use by, or production date/code
- 12. The source firm name, establishment number and use by/sell by/production date/code for all Shop trim/rework used in each lot of store ground product
  - 13. Date and Time the grinder was sanitized between source materials
- 14. Bills of Sale (e.g. sales receipts) reflecting Item numbers for each ground beef product sold to consumers
  - 15. Invoice(s) and Bill(s) of lading for source product(s)