

## **Department of Agriculture, Food and the Marine**

### **Trader Notice MH 14/2015**

**To: All Food Business Operators at USDA Approved Meat Establishments**

**Subject: Intended Use of Intact Raw Beef<sup>1</sup> being exported from Ireland to the United States of America**

#### **Background**

In June/July 2014 inspectors from the Food Safety Inspection Service (FSIS) of the United States Department of Agriculture (USDA) carried out a Beef Equivalence Reinstatement Audit of the Department of Agriculture, Food and the Marine (DAFM) systems to determine if Ireland could resume the export of Beef to the United States of America (USA).

On December 30<sup>th</sup> 2014 DAFM received notification that Ireland could resume the export of beef to the USA.

[FSIS Directive 10,010.1 Rev. 3](#) describes the rules and procedures for the verification of control of E.coli O157:H7 in beef. It differentiates between the procedures and sampling requirements required for intact raw beef intended for manufacturing into non-intact product and intact product.

#### **Scope**

The Trader Notice applies to the export of intact raw beef, intended for use as intact product in the form of primal cuts, sub-primal cuts and intact cuts to the USA from premises on the USDA approved list.

#### **Role of the FBO**

In order to be permitted to export intact raw beef in the form of primal cuts, sub-primal cuts and intact cuts to the USA, FBOs at approved establishments are required to put in place documented procedures regarding the intended use of the beef.

To achieve this aim the FBO is required to draft an SOP which must state at least the following:

1. That the hazard analysis<sup>2</sup> and flow chart demonstrates that intact raw beef destined to be exported to the USA is intended only for inclusion as intact product at the recipient's premises.
2. That the FBO has put in place controls that ensure that the product is used as intended. These must include:
  - a. The maintenance of a list of US customers who receive or will receive raw intact beef in the form of primal cuts, sub-primal cuts and intact cuts.

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<sup>1</sup> Intact raw beef is defined as cuts of whole muscle(s) that has **not** been ground (minced), injected, mechanically tenderized, or reconstructed

<sup>2</sup> [FSIS Directive 10,010.1 Rev. 3, Part I \(A\) \(9\)](#)

- b. A *Letter of Guarantee of Intended Use* must be received from all product recipients, clearly identifying the product to be received, stating that the product will only be used as intact product.
- c. Each product recipient will receive clear identifying details (including producing establishment's registration number, lot number, production date, and health certificate number) for each intact product type exported, and these details will be reproduced in the recipient's Letter of Guarantee.
- d. Through regular communication with the recipient (quarterly) the FBO must verify that the recipient is, in fact, using the product in accordance with the Letter of Guarantee. This verification must be recorded (log of e-mails, etc.) and kept on file.
- e. Maintenance of all appropriate records to demonstrate compliance with the SOP and to make such records available to DAFM, on request.

### **Enforcement**

In the event that non-compliance is identified during the verification of intended use, the VI is required to immediately suspend certification of intact product to the USA and inform his/her RSVI.

All corrective actions carried out by the FBO to bring the system back into compliance will be verified by DAFM prior to the resumption of certification to the United States.

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**22<sup>nd</sup> July 2015**