

Department of Agriculture, Food and the Marine

Trader Notice MH 4/2016

To: All Food Business Operators interested in approval to export ground beef or precursor material for the production of ground beef (beef intended for grinding) to Canada

Introduction

This Trader Notice is being issued to Food Business Operators to advise them regarding the additional conditions that must be satisfied if they wish to be approved for the export to Canada of **ground beef or precursor material for the production of ground beef (beef intended for grinding)**. It should be read in conjunction with Trader Notice MH 20/2015

FBO Requirements – Beef Intended for Grinding (BIFG)

Please Note:

N60 sampling of precursor materials for the manufacture of raw ground beef intended for export to Canada must take place at the plant of production of the precursor materials and not at the plant of manufacture of the ground beef (if they are different).

Role of the FBO

- FBOs intending to export beef intended for grinding (BIFG) or ground beef to Canada must draft SOP(s), in consultation with DAFM, covering the following:
 - Lot identification
 - N60 sampling procedure
 - Control of Sampled Lots
 - Any laboratories used to test for *E. coli* O157:H7 will be DAFM approved and accredited to ISO 17025.
 - Lab test results to be reported simultaneously to DAFM and FBO
 - Action to be Taken in the Event of a Positive Test Result for *E. Coli* O157:H7
 - Action to be taken in the event of a High Event Period (HEP)¹
- The SOPs for Lot identification and N60 sampling procedure should be written using CFIA [Annex O: Policy on the Control of *E. coli* O157:H7/NM Contamination in Raw Beef Products](#) as a guideline.
- Lots should be defined in a manner that ensures they are microbiologically independent i.e. no other lots are implicated.
- All lots of beef intended for grinding and destined for the Canadian market will be subject to N60 Sampling to confirm the lot is test negative for *E. Coli* O157

¹ High Event Periods are periods in which slaughter establishments experience a high rate of positive results for *E. Coli* O157:H7 in meat samples from production lots containing the same source materials.

- Sampled lots must be held by the FBO and only consigned/shipped for Canadian trade on receipt of *negative* results.
- The FBO must document and record how the affected Lot is controlled in line with their SOP on *Action to be Taken in the Event of a Positive Test Result for E. Coli O157*
- Disposition of lots that have been excluded from trade with the Canada must be addressed by FBO procedures to the satisfaction of DAFM.

The general procedure for FBO N=60 Sampling is described in [Annex 1](#) of this VPN.

Defining a Lot

A lot cannot weigh more than approximately **4,500 kg**.

The FBO must define the lot in their SOP for the purpose of sampling precursor materials for *E. coli* O157 using the following guidelines:

1. A lot is defined as comprising all cartons, packages or containers either:
 - a) Produced under the same conditions at one establishment from one effective clean-up and sanitation to the next effective clean-up and sanitation provided the volume of production does not exceed approximately 4500 kg; or
 - b) Determined by the operator when implementing a statistically based sampling program. The FBO must have an acceptable rationale that supports the alternative lot definition. or
 - c) Establishments producing less than 4,500 kg of each type of PM (e.g., trim, bench trim, cheek meat, hearts, finely textured beef etc.) per day may consider more than one day of production as one lot for that type of PM provided that they meet the following conditions:
 - i. Perform full sanitation and cleaning at the end of each production day,
 - ii. The product lot does not exceed five consecutive calendar days of production and does not exceed approximately 4500 kg,
 - iii. The entire lot is evenly sampled for testing and in the event of a positive test result, the whole lot is considered to be positive and the source materials subjected to investigation.
2. Before taking a sample for *E. coli* O157 testing, the FBO must isolate and clearly identify the lot according to their SOP. The sampled lot, and any raw product manufactured from the lot, must be held pending receipt of laboratory results. The FBO must further identify the supplying establishment number (if product received from another establishment), the production date, production lot number and any other relevant data available about the lot;
3. In cases where no satisfactory scientific basis is provided by the operator for lot definition, the default lot considered by DAFM will be the product produced under the same conditions at one establishment from one effective clean-up and sanitation to the next effective clean-up and sanitation;
4. It should be noted that if an FBO has an acceptable rationale that supports an alternate lot definition and regularly tests specific lots of product for *E. coli* O157, this information could possibly be a basis for determining whether one *E. coli* O157-positive lot will implicate other lots produced on the same day.

FBOs must segregate source materials received from different suppliers. When *E. coli* O157 is detected, FBOs must verify the status of CCP compliance and test results at all supplying establishments as per the purchase specification agreement to identify any deviation, unusual trends or high event period (HEP) on the day the source material was produced and must inform DAFM accordingly.

Procedures in case of an inconclusive test result

If an inconclusive result from the PCR analysis is reported, the laboratory should be asked to re-test the original sample using the same DNA extract from the original broth enrichment.

If that re-test is also inconclusive, then the laboratory should proceed with the confirmatory culture procedure to detect any *E. coli* O157 that may be present in the sample. These steps should be followed before notifying FBO and plant DAFM personnel of any test result.

If the confirmatory culture procedure tests inconclusive, then the Lot cannot be exported to the Canada. The FBO must record how the affected Lot is controlled in line with the SOP on *Action to be taken in the Event of a Positive Test Result*.

Audrey M Lyons,
Meat Hygiene Division
29th February 2016

Annex 1

Procedure for FBO sample collection for N=60 testing.

1. The FBO must identify the lot intended for export to the Canada
2. The identified lot is held under “QA Hold” notice.
3. From this lot 12 cartons of beef intended for grinding (representative of the lot) are randomly selected. The N 60 samples will be taken from these cartons.
4. The FBO must gather the following equipment needed for sampling: sterile sample bags from the laboratory, knife, meat hook or forceps, and sterile gloves. Label the sample bag with the lot and date information. Sanitize the knife, hook or forceps before collecting the samples by using a sanitizing solution according to label instructions, or by using hot water ($\geq 82^{\circ}\text{C}$) as a sanitizer. Wash and sanitize hands before sampling. Clean and sanitize hands and equipment between different lots sampled.
5. The FBO must use sterile gloves to handle all sanitized surfaces so they do not become contaminated.
6. **5** beef lean trim pieces from each of the 12 randomly selected boxes must be aseptically collected. The sanitized hook or forceps must be used to lift a piece of meat off the top of the box/tray. The total number of pieces collected is to be **60** for each sample.
7. A slice is taken from each of the 60 pieces approximately **3** inches in length, **1** inch in width, and **1/8** inch thick. The priority is to collect samples from pieces of product taken from the original surface of the beef carcass. Each piece should weigh approximately **6.25g**
8. The composite sample weighing a total of 375g (60 x 6.25g) must be stored under refrigeration ($< 7^{\circ}\text{C}$.) until they are transferred into sealed transport coolers for delivery to the laboratory within 24 hours.
9. The FBO samples must be delivered to the DAFM approved private laboratory for analysis within 24 hours of sample collection.
- 10.** *All results must be reported to the FBO and directly to the Veterinary Office.*
- 11.** All sampled lots will be held and controlled by the FBO (verifiable by DAFM) until the test results for the lot have been received.