

# Beef E. coli O157:H7 Testing Programs and Testing Declarations Statement

## Animal Protein North America

### Beef, Beef By-Products

Thank you for your request for information on testing programs and customer notifications at Cargill Protein facilities in the United States and Canada. The following products may be sampled and tested for *E. coli* O157:H7 based on processes and intended use:

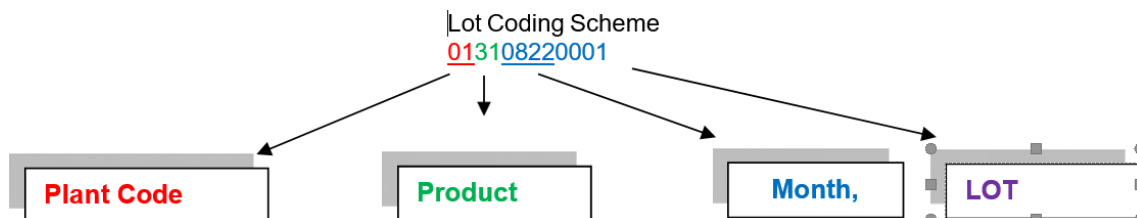
- Variety meats that may be used in raw ground products (head and cheek meat, weasand meat, tongue root trim, and hearts);
- Finely textured beef (FTB) as defined in the United States;
- Boxed trim;
- Combo trim (including non-vacuum packed primal/sub-primals, unless sold for cooking only)
- Ground beef (boxed or combo)

All other products or product types, including vacuum packaged boxed beef, are not tested and not intended for use into raw ground or non-intact beef products.

#### Lotting:

- Fresh Combo Trim: Fresh Combo Trim Lot size for combos will be a maximum of 5 combos and a minimum of 1 combo.
- Box Trim: There are a maximum of 96 boxes in a lot.
- FTB: There are a maximum of 96 boxes in a lot.
- Offal: Lotted by production period or maximum of 100 boxes whether the product is fresh or frozen.
- Ground Beef: Lotted by ½ hour, 1 hour or 2 hour time frames.

Each lot will be identified with a unique 12-digit lot number. An example of this is given below:





The following are the plant codes for the Cargill establishments associated with this letter:

02-Friona (86E)  
04-Dodge City (86K)  
07-Schuyler (86M)  
13-Newnan (86G)  
14-Marshall (85M)  
15-Hazleton (86P)  
26-Ft. Morgan (86R)  
29-Columbia (86A)  
31-High River (93)  
60-Ft. Worth (86F)  
61-Guelph (51)  
66-Wyalusing (9400)  
76-WCP Grind (31913)  
77-Fresno (354)  
78-Fresno Grind (34706)  
82-Brampton (146)  
92-Butler Grind (924A)

**EXAMPLE**

023011280008


02 is the Friona plant, 30 is Fresh Boxed Trim, Produced on November 28, the  
8th Lot

**Sampling:**

- **Trim:** All trim samples are collected using an excision method. All lots must have a minimum of 60 excision samples taken, regardless of lot size. Collected excision samples result in the sample weight being no less than 375 grams for analytical purposes. NOTE: If frozen boxed trim was boxed from a previously tested (negative) combo lot, the resulting boxes would not be resampled/retested. A Product Notification Document (PND) statement showing original combo test results were negative shall be provided for the intact lot.
- **95% Lean Ground Beef:** Sampling is performed by collecting a grab sample from every box in the lot for a total of no less than 375 grams.
- **Ground Beef:** Samples are collected at a designated interval from every operational line. All line samples are combined by time point into a minimum of one 375 gram sample per lot.
- **Variety Meat ground beef components:** All samples will be pulled by an excision or sponge method depending on the type of offal. When using the excision method, all lots must have a minimum of 60 excision samples taken, regardless of lot size, and weigh no less than 375 grams for analytical purposes. When using the sponge method, each box must be sampled regardless of lot size. Sponges may be composited for analysis purposes.

**Analysis:** The analytical method that is used by all third-party laboratories testing for *E. coli* O157:H7 for Cargill is the BioControl Assurance GDS™. This method utilizes polymerase chain reaction (PCR) and has been shown to be highly sensitive and accurate. The GDS™ system targets on the actual genetic structure of bacteria by detecting a unique DNA fragment found only on the target organism. It also employs an Immuno-Magnetic Separation (IMS) step, which makes the method highly sensitive and specific. Total time to receive results is approximately 14 to 24 hours depending upon lab location, sample type, and time of sample shipment and arrival.

**Shipping and Customer Notification:** Cargill's process includes both manual and electronic control of products based on pathogen test results. Since all U.S. and Canada plants utilize accredited third-party laboratories for pathogen testing,



all Certificates of Analysis (COA) are forwarded directly to the corporate office in Wichita, KS, or facility designees. After two reviews of the COA, test results, and additional internal documents, product disposition is determined. For all tested products, except ground beef, customers receive a *Product Notification Document* (PND) which includes the analytical method, number of samples and sample weight, customer name and location, producing plant, order and P.O. number, lot number(s), product code(s), product quantity, pre-shipment review statement, and test result. The PND is automatically generated then emailed and/or faxed to the customer. Please note that the PND contains most elements of a COA. COAs are not provided because it would require a manual process resulting in an increased chance for error and it would greatly slow the release and shipment of products, however the PND contains a statement that the results have been verified by review of a signed laboratory COA. Cargill's "PND" has been accepted with no objections by USDA and CFIA, as an alternative method to Certificate of Analysis (COA)<sup>1</sup>.

Additional information for Cargill products include:

Fresh Combo Trim and Boxed Trim: USDA has stated that they will allow trim to be shipped from the producing plant provided that it is not unloaded at the delivery location until test results are final and determined to be negative for *E.coli* O157:H7. Cargill will have a statement on the bill of lading of all loads containing trim that has been shipped prior to test results being determined that states: **"This shipment has lots that have been sampled for E. coli O157:H7. Do not break trailer seal or unload product on this shipment until notified in writing by Cargill that the lots have been released."** When necessary, the customer will be notified of any load of product needing to be returned to a Cargill facility.

- Ground Beef: A *Product Notification Document* is not provided since the customer is not known when the product is sampled and tested, and a single lot may be shipped to multiple customers. Instead, a stated testing declaration is made on the Bill of Lading that accompanies every shipment.
- Intact Vacuum Packaged Beef Subprimals: Each Cargill beef facility produces subprimal products packaged into vacuum sealed bags then boxed or placed in combos that are not tested and are intended solely for intact use. Cargill expects any customer who purchases vacuum packaged beef primals either in boxes or combos, and then uses that product for other than intact production, to address that specific usage within their HACCP plan and have appropriate controls in place.

**Presumptive Positive Product:** Our goal is to never have product test presumptive positive, however, some lots do test presumptive positive. In the event that a lot (or lots) test presumptive positive on any load that has been shipped prior to test results being received, the entire load of product will be returned to a Cargill facility and the suspect product removed and utilized for cooking only and/or rendered as inedible.

**Claims:** *The labeling, substantiation and decision making of all claims for your products is your responsibility. We recommend you consult regulatory and legal advisors familiar with all applicable laws, rules and regulations prior to making labeling and claims decisions for your products.*

## Contact

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