#### WORLD'S LEADING ANIMAL PROTEIN PRODUCER



# Intended Use of Non-Intact Products

CFP April 16, 2018

Sherri Jenkins, JBS USA Food Company





#### MAKING YOUR WORLD STRONGER

#### JBS Beef Food Safety Intervention System



MAKING YOUR WORLD STRONGER

#### What do interventions look like?



MAKING YOUR WORLD STRONGER

JBS

#### Why are different interventions utilized?

- Multiple hurdle approach stacking different types of antimicrobial solutions or systems throughout the production process to make it difficult for microorganisms to survive the process.
  - Types of interventions thermal, pH, chilling, combinations





### What is a 'non-intact' product?

□ FSIS Directive 10,010.1, Revision 4

 Raw, non-intact product – i.e., ground, mechanically tenderized, needled, and vacuum marinated.



#### Why is non-intact different?



#### Non-intact or Intact Product



#### HACCP and Non-intact Products

Hazard analysis – addresses the likelihood of occurrence for pathogens.

Antimicrobial interventions to reduce potential contamination may be applied as a processing aid or as a CCP prior to producing non-intact products.

# Why is intended use important?

- What does JBS intend to be for non-intact versus intact products?
  - Intact any vacuum packaged product(s) whether in a box or a combo.
  - Non-intact naked (not vacuum packaged) product(s) in a box or a combo.
- What happens when customers use the product for non-intact when it was not intended for that use?
  - The 'lot' is unknown and not able to be controlled.



#### Lotting and Testing product destined for ground beef

- Beef trimmings are destined to be raw, ground beef; therefore, they are <u>ALL</u> tested.
- □ Lots are typically 1 combo up to 5 combos.
- Lots should never be divided between use.





MAKING YOUR WORLD STRONGER

# Labeling of non-intact

- On May 18, 2015, FSIS published a final rule that established labeling requirements for raw or partially cooked mechanically tenderized beef products.
- Does not apply to ground beef, hamburger patties, or beef patties.
- Does not apply to cubed steaks visually able to tell it is tenderized.
- Does not apply to fully cooked products.

## Bench Trim

- Occurs when a processor or retailer utilizes INTACT products to make smaller portions and the TRIM that comes from this process is termed 'bench trim'.
- Hazards of using Bench Trim
  - Multiple suppliers with different food safety systems.
  - The lot of the product is unknown and therefore not able to be controlled.



## Bench Trim

- If the processor is an FSIS inspected establishment, this process MUST be addressed in their HACCP plan.
  - Supplier approval program
  - Apply an antimicrobial intervention
  - Lot and test the bench trim



