

VERMONT AGENCY OF AGRICULTURE, FOOD & MARKETS
CONSUMER PROTECTION AND FOOD SAFETY
Meat Inspection Service
MONTPELIER, VT
Anson Tebbetts, Secretary

 MIS DIRECTIVE Adopted from FSIS Directive 5000.10	5000.10	12/1/2018
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VERIFYING THAT RECORDS ARE KEPT BY OFFICIAL ESTABLISHMENTS THAT GRIND BEEF

I. PURPOSE

This directive provides instructions to inspection program personnel (IPP) on how to verify whether official establishments are maintaining required records concerning suppliers and source materials for raw beef ground at the establishment.

II. BACKGROUND

A. The regulations in 9 CFR 320.1(b)(4) require official establishments and retail stores to keep the following information when they grind raw beef:

1. The establishment numbers of the establishments supplying the materials used to prepare each lot of raw ground beef product;
2. All supplier lot numbers and production dates;
3. The names of the supplied materials, including beef components and any materials carried over from one production lot to the next;
4. The date and time each lot of raw ground beef product is produced; and
5. The date and time when grinding equipment and other related food-contact surfaces are cleaned and sanitized.

B. Under 9 CFR 320.1(b)(4)(iii), a ground beef lot is defined, for the purpose of raw ground beef recordkeeping, as the amount of ground beef produced during particular dates and times, following clean up and until the next clean up.

C. The regulations require the records to be maintained at the location where the raw beef was ground (9 CFR 320.2) and to be maintained for one year (9 CFR 320.3(c)).

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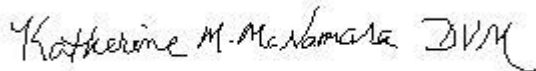
III. IPP RESPONSIBILITIES IN AN OFFICIAL ESTABLISHMENT THAT GRINDS RAW BEEF

- A. IPP are to verify that the official establishment is maintaining records as set out in 9 CFR 320.1(b)(4), 320.2 and 320.3(c).
- B. IPP are to verify that official establishments meet these recordkeeping requirements when scheduling and performing a Public Health Information System (PHIS) “*Raw Non-Intact HACCP*” task or “*Heat Treated-Not Fully Cooked-Not Shelf Stable HACCP*” task (i.e., for a breaded ground beef product). IPP are to request the production records from the establishment to verify whether the establishment maintains the required information for that lot of raw ground beef.
- C. If the official establishment is not maintaining the records, then IPP are to document noncompliance with 9 CFR 320.1(b)(4), 320.2, or 320.3.
- D. In a facility that houses both an official state-inspected establishment and a retail store, Compliance Investigators are to verify whether the retail store complies with the new recordkeeping requirements by following the instructions found in VT Directive 8010.1, *Methodology for Conducting In-Commerce Surveillance Activities*. IPP are to verify whether the official establishment meets the recordkeeping requirements.

IV. CIRCUMSTANCES IN WHICH AN OFFICIAL ESTABLISHMENT IS NOT REQUIRED TO MAINTAIN GRINDING RECORDS

- A. If an establishment either processes all ground beef product into ready-to-eat (RTE) product or moves all ground beef product to another official federally-inspected establishment for further processing into RTE product, IPP are not to verify whether establishments meet these recordkeeping requirements.
- B. For example, an establishment grinds beef and produces not ready-to-eat (NRTE) ground beef as one of its products. The establishment ships all of its NRTE ground beef product to another establishment that uses all of the received product to make a RTE product. In this situation, the shipping establishment is not required to maintain grinding records; however, if any of the raw product is not destined for RTE product in an official establishment, the shipping establishment would have to maintain grinding records that would be subject to VAAFAM review.

V. QUESTIONS

Handwritten signature of Katherine M. McNamara in black ink, followed by the initials DVM.

Deputy Director Food Safety Consumer Protection
VT Meat Inspection Service