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Outbreak to Recall A Case Study

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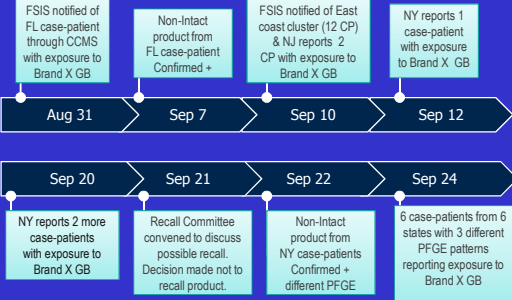


Tainted-Beef Recall Sparks Consumer Concerns



- "2007- year of the recall"; peanut butter, pet food, toys, cribs....
- Of 21 meat recalls for *E. coli* O157:H7 in 2007, 10 are associated with illnesses.
- *E. coli* fears trigger large beef patty recall.

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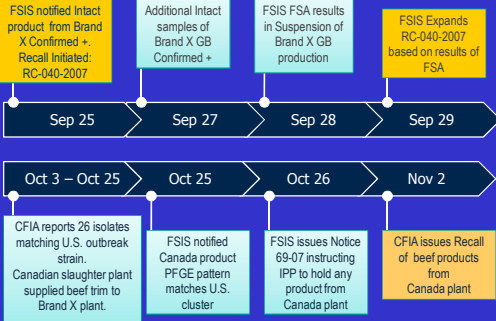



Timeline of events:

- Aug 31:** FSIS notified of FL case-patient through CCMS with exposure to Brand X GB
- Sep 7:** Non-Intact product from FL case-patient Confirmed +
- Sep 10:** FSIS notified of East coast cluster (12 CP) & NJ reports 2 CP with exposure to Brand X GB
- Sep 12:** NY reports 1 case-patient with exposure to Brand X GB
- Sep 20:** NY reports 2 more case-patients with exposure to Brand X GB
- Sep 21:** Recall Committee convened to discuss possible recall. Decision made not to recall product.
- Sep 22:** Non-Intact product from NY case-patients Confirmed + different PFGE
- Sep 24:** 6 case-patients from 6 states with 3 different PFGE patterns reporting exposure to Brand X GB

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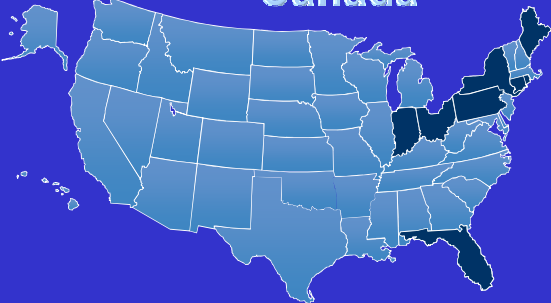
- Sep 25:** FSIS notified Intact product from Brand X Confirmed +. Recall Initiated: RC-040-2007
- Sep 27:** Additional Intact samples of Brand X GB Confirmed +
- Sep 28:** FSIS FSA results in Suspension of Brand X GB production
- Sep 29:** FSIS Expands RC-040-2007 based on results of FSA
- Oct 3 – Oct 25:** CFIA reports 26 isolates matching U.S. outbreak strain. Canadian slaughter plant supplied beef trim to Brand X plant.
- Oct 25:** FSIS notified Canada product PFGE pattern matches U.S. cluster
- Oct 26:** FSIS issues Notice 69-07 instructing IPP to hold any product from Canada plant
- Nov 2:** CFIA issues Recall of beef products from Canada plant

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Canada



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- Recall expands to 21.7 million pounds (1 years production)
- Distribution Nationwide retail and Exports
- Impacts 11 Brands and 1 other Federal Establishment
- Occurred on a Friday!

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Consequences

- 43 case patients from 8 states
- 21 hospitalizations; 2 HUS; no deaths
- Add'l cases in Canada
- Firm ceased operations
- 2.2 million lbs recovered/destroyed
- At the time, 5th largest recall;
 - Largest beef recall


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Outcomes

- Heightened interest in all recalls by Congress, media, and general public.
- OIG audit to evaluate FSIS recall procedures



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Recommended Actions

- Final OIG report issued August 2008
- 1. Collect and analyze greater number of representative samples during outbreak investigations.
- 2. Implement new Directive for investigating foodborne illness and for handling recalls. (FSIS Directive 8080.3)
 - Revised Recall Directive 8080.1 issued Nov. 2008

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Policy Changes

- Notices to expand sampling programs
 - Sampling of raw ground beef based on volume
 - Routine sampling of trim and source materials other than trim, such as two-piece chuck, sub-primals, LFTB, and bench trim
 - Includes follow up sampling of component materials at all suppliers to a positive event
- FSA scheduled at all firms with a reported positive FSIS sample result
- Focus on getting available best practices to establishments
- Reassessment of E. coli controls
 - Checklist/survey to catalog industry practices
 - Draft compliance guidelines issued in 2008
 - Criterion for high event periods
 - Verifying sanitary dressing procedures

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Proposed Next Steps

- Initiate rulemaking to identify tenderization as a material fact that must be identified on labeling
- Propose mandatory "test and hold"
- Begin earlier traceback activities to identify all affected product and suppliers and respond more rapidly to protect the public health
- Mandatory record keeping requirements that would facilitate traceback at retail when a product is recalled
- Develop new N60 sampling instructions

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Published Guidance

- FSIS Directive 10, 010.1, Revision 2 July 31, 2009 Verification Activities for Escherichia coli O157:H7 in Raw Ground Beef Products
- Posted on Significant Guidance Page at http://www.fsis.usda.gov/Significant_Guidance/index.asp
 - Compliance Guidelines for Establishments on the FSIS Microbiological Testing Program and Other Verification Activities for Escherichia coli O157:H7
 - Draft Compliance Guideline for Sampling Beef Trimmings for Escherichia coli O157:H7
 - Draft Guidance for Small and Very Small Establishments on Sampling Beef Products for Escherichia coli O157:H7
 - Draft Label Policy Guidance for N-60 Testing Claims for Boneless Beef Manufacturing Trimmings ("Trim") Concerning E. coli O157:H7

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Thank you

