Outbreak to Recall
A Case Study

Food Safety and Inspection Service
United States Department of Agriculture

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.

Recall Committee 
confirmed +.

Additional Intact 
Canadian slaughter plant 
Confirmed +.

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!

Recall Initiated: 
X Confirmed +.

FSIS notified Intact
Canadian product
from Brand X GB

Recall Committee 
convened to discuss 
possible recall. 
Division made not to 
recall product.

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CFIA reports 28 isolates 
matching U.S. outbreak 
strain.
Canadian slaughter plant 
supplied beef trim to 
Brand X plant.

Fx9988 results 
Rc 346.2007 
based on results of 
FSA

CPA reports 26 isolates 
matching U.S. outbreak 
strain.
Canadian slaughter plant 
supplied beef trim to 
Brand X plant.

FSA results 
FSA results 
Suppression of 
Brand X GB 
production

Appended 14

Recall Release

Recall Release
Recall release 
Canada

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APPENDIX 14

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

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

Policy Changes
- FSIS Directive 10, 010.1 Revision 2 July 31, 2009 Verification Activities for Escherichia coli O157:H7 in Raw Ground Beef Products
  - Compliance Guidelines for Establishments on the FSIS Microbiological Testing Program and Other Verification Activities for Escherichia coli O157:H7
  - Draft Compliance Guidance for Sampling Beef Trimmings 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

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

Published Guidance
Thank you