



Subprimal Products and FSIS MT65 Testing Information

Animal Protein North America

Beef, Beef By-Products

Each Cargill Protein beef facilities produces subprimal products packaged into bags that are vacuum sealed then boxed or placed in combos that are not tested and are intended solely for intact product 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 the appropriate controls in place.

This letter contains information regarding Cargill's process and may be used to help satisfy purchaser's specifications in meeting requirements for FSIS MT65 sampling plan as written in FSIS Directive 10,010.1 rev. 4.

Cargill facilities covered by this letter include:

<u>Facility Location</u>	<u>FSIS Establishment #</u>
Frona, TX	86E
Dodge City, KS	86K
Schuyler, NE	86M
Fort Morgan, CO	86R
Fresno, CA	354
Wyalusing, PA	9400

<u>Facility Location</u>	<u>CFIA Establishment #</u>
Guelph, ON	51
High River, AB	93

Intact Product Information

Cargill's intact products are not needle or mechanically tenderized. The fabrication process is designed to prevent commingling products, and products are treated with a validated antimicrobial intervention. Many bags only contain one piece in a package and each package is considered one lot. When multiple pieces are in a bag, then all pieces in the individual bag are considered one lot. All Cargill beef facilities have a reconditioning process to address times when unavoidable commingling occurs within its establishment to restore an individual package's status as one lot. Additionally, Cargill employs an event program that includes the consideration of subprimals. Trim and subprimals associated in an event are not sold for use into the raw beef supply chain.

Please take this into consideration as you develop your lots for FSIS testing under the MT65 sampling program.



Previously Tested Trim & Subprimals Intended for Non-Intact Product Use

Cargill also produces tested trim and subprimals that are not bagged but packaged 'naked' in combos and intended for non-intact use, such as grinding, needle tenderizing, or injection. A Product Notification Document is sent to the customer verifying that samples of the lot were tested and found negative for *E. coli* O157:H7. Per FSIS Directive 10,010.1 Rev. 4, these items were previously eligible to be sampled under either MT64 or MT60 at the harvest/fabrication establishment and are not eligible for sampling under MT65 provided your establishment can provide proof of testing. The Product Notification Document (PND) you received will provide the proof of eligibility of sampling.

Contact your FSIS Front Line Supervisor and ask why the sampling is occurring if an FSIS Inspector chooses to resample previously tested and found negative trim or subprimals after showing him/her the PND. If product is sampled, please retain all products within the testing lot (all combos in a multi-combo lot and all cases for a boxed product). It is critical that you carefully record the case/combo label information for traceability in the unlikely occurrence of a positive test result. A picture of each label is also acceptable (preferred).

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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