



United States Department of Agriculture

Food Safety and
Inspection Service

May 4, 2017

Office of Policy and
Program Development

Risk, Innovations, &
Management Staff
Patriot Plaza III

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Avenue, SW,
Washington, D.C.
20250-3700

Tommy Wheeler, Ph.D.
Meat Safety and Quality Research Unit
U.S. Meat Animal Research Center
USDA, Agricultural Research Service
P.O. Box 166, State Spur 18 D
Clay Center, NE 68933

Dear Dr. Wheeler,

This letter is in response to your request dated February 22, 2017, to utilize a Continuous Sampling Device (CSD) or a Manual Sampling Device (MSD) as a sampling methodology use for the detection of *Salmonella* and/or Shiga Toxin Producing *E.coli* (STEC) or other indicator organisms on beef trimmings (FSIS Log No. 15-SMP-1064-N-B).

Specifically, you are requesting to use the CSD and MSD to sample beef trimmings in federally inspected establishments for verification testing for pathogens (*Salmonella* and STEC) and indicator organisms. Research data provided by Agricultural Research Service (ARS) demonstrated the CSD and MSD sampling methods were at least equivalent to the N60 method and the IEH Plus Sampler for detection of pathogens and indicator organisms for beef trimmings.

FSIS has completed its review of your protocol and has no objection to either the CSD or MSD sampling methods on beef trimmings provided that the following operational parameters in the April 27, 2017 document titled, "Protocols for Continuous (CSD) and Manual (MSD) Sampling Devices for Testing of Beef Trim," are met including:

- The CSD and MSD are cloth composed of a spunbond olefin polymer, 2.25 oz. wt.
- The CSD will contain a minimum sampling area of 140 square inches with dimensions and positioning such that all trim in a combo passes over the CSD and has an opportunity to contact the sampling cloth.
- The MSD will contain a minimum sampling area of 140 square inches sampling area and both sides are to be utilized in the sampling process (280 square inches using both sides).

- Product that comes in contact with either a MSD or CSD would be part of the implicated lot if that device’s testing result is positive for a pathogen.
- The CSD and MSD are used on single combo bin lots. With a standard combo bin containing not more than 2500 pounds and having at least 1600 square inches of surface area.
- Applying and removing the CSD or MSD will be done in an aseptic manner. Appropriate measures will be taken to avoid cross contamination while collecting the sample.
- Samples collected using the MSD or CSD methodology are to be collected in a manner to minimize absorption of residual antimicrobial agents from the production process since no neutralizing buffer is added to the cloth.

The establishment will need to reassess its hazard analysis based on the implementation of this new sampling methodology. The establishment should consider how its results may be affected by new methodology including: variation in the surface area being sampled, and by interventions that may be applied to the trim pieces.

As described in the FR Notice Vol. 70, No. 201, Pages 60784-60786, dated October 19, 2005, a summary description on your new technologies will be posted on the [Food Safety and Inspection Service New Technology Information Table](#). If you do not object within five business days from the date that you receive this letter, the Agency will post the included description of the technology on the Web site. If you do object to the description, you should state in writing that you object to the description, explain the basis for your objection (for example, proprietary agreement, confidential commercial information, etc.), and provide an alternate description. FSIS will post the alternate description, unless the Agency concludes that the description does not fairly describe the technology. In such a case, FSIS will post the description that it prepared and will notify the company of its decision. FSIS will post the following summary description of your technology:

Case Number	Company Name	Summary of the Notification/Protocol
15-SMP-1064-N-B	USDA Agricultural Research Service	A method of sampling beef trimming for pathogens and indicator organisms using a Continuous or Manual Sampling Device.

If changes are needed to this program, you must submit any changes to FSIS in writing for review and approval prior to implementation.

If you have any questions or would like to modify your SOP, please contact Dr. Bryan Trout by email at bryan.trout@fsis.usda.gov or by phone at (402)-344-5058.

Sincerely,

William K. Shaw, Jr., PhD
Director
Risk, Innovations and Management Staff
Office of Policy and Program Development