



Export Verification Program Microbiological Testing of Ready-To-Eat (RTE) Products Destined for Canada

1. Purpose

This Agricultural Marketing Service (AMS) Export Verification (EV) Program is designed to verify the establishment's control of pathogens in closed-faced sandwiches destined for Canada and produced in establishments under Food Safety and Inspection Service's (FSIS') Voluntary Reimbursable Inspection Service. This EV program likely will eventually be expanded to include other RTE products.

Under 9 CFR part 430, RTE products that are exposed to the environment post-lethality are adulterated if they test positive for *Listeria monocytogenes* (*Lm*) or come into direct contact with a food contact surface that tests positive for *Lm*. RTE products are also adulterated if they or food contact surfaces over which they pass test positive for *Salmonella* or other pathogens. FSIS utilizes microbial testing as a tool to verify the adequacy of an establishment's food safety system, including the measures that the establishment implements for the control of *Lm*. FSIS considers non-post-lethality exposed RTE meat or poultry products to be adulterated if they test positive for *Lm*, *Salmonella*, or other pathogens or their toxins.

2. Scope

For closed faced sandwiches produced under FSIS voluntary inspection, the Agricultural Marketing Service (AMS) will conduct a microbiological testing program, on behalf of FSIS, to verify the adequacy of establishment's food safety system in producing RTE products. Only establishments participating in this program can export closed-faced sandwiches to Canada.

For the products produced under FSIS voluntary inspection, FSIS will verify that establishments maintain adequate HACCP systems and adequate sanitary conditions. These FSIS verification activities will be provided by FSIS as a reimbursable service, which means that the cost of FSIS verification activities performed will be paid by the establishments.

3. References

- 3.1** Control of *Listeria monocytogenes* in post-lethality exposed ready-to-eat products, 9 CFR 430.4 (2003)
- 3.2** Verification Procedures for Enforcement, Investigations and Analysis Officers (EIAOs) for the *Listeria monocytogenes* (*Lm*) Regulation and Routine Risk-based *Listeria monocytogenes* (Rlm) Sampling Program, FSIS Directive 10,240.5 (March 28, 2013)



3.3 Intensified Verification Testing (IVT) Protocol for Sampling of Product, Food Contact Surfaces and Environmental Surfaces for *Listeria monocytogenes* or *Salmonella spp.*, FSIS Directive 10,300.1, Revision 1 (March 28, 2013)

3.4 Unified Sampling Form, FSIS Directive 10,210.1 (October 14, 1997)

4. AMS Microbiological Testing Program

4.1 Routine Product Testing

Testing will be conducted to verify that establishments producing RTE meat and poultry products are controlling *Lm* and are in compliance with 9 CFR Part 430. Six product samples will be collected per year for each establishment, regardless of plant size, production volume, or process design. All six samples will be analyzed for *Lm* and *Salmonella*. If an establishment produces both post-lethality exposed and non-post-lethality exposed product, the six samples will be for post-lethality exposed product, and two additional samples will be collected for non-post-lethality exposed product. Establishments participating in the program are required to hold the product while it is being tested.

AMS will randomly select the dates that the samples will be collected and will notify the establishment and the FSIS inspector of the dates. AMS will provide the sampling form to be completed with each sample collected. FSIS will collect the samples and pack them for shipment. Samples collected will be analyzed by the USDA, AMS, National Science Laboratories (NSL) in Gastonia, NC. The cost of sample collection, shipping materials, and sample analysis will be paid for by the establishment.

4.2 Intensified AMS Testing

AMS will schedule and conduct intensified testing at least annually. In intensified AMS testing, samples are collected in units. For *Lm* intensified AMS testing, a unit consists of 10 food contact surface samples, 5 environmental samples, and 5 product samples per RTE processing line in operation on the day of sampling. For *Salmonella* intensified AMS testing, a unit consists of 5 food contact surface samples, 8 environmental samples, and 5 product samples per RTE processing line in operation on the day of sampling. AMS will collect the samples. Also, AMS will initiate intensified testing after AMS finds a positive *Lm* or *Salmonella* result in either finished product or on a food contact surface. AMS may also initiate intensified testing in response to continuing sanitation non-compliances at the establishments. In these situations, the intensified AMS testing is performed after the establishment has taken its corrective and preventive measures in response to AMS positive results or FSIS findings concerning sanitation. If positives are found during the intensified AMS testing, another unit will be collected for testing. Samples collected will be analyzed by the NSL in Gastonia, NC. The cost of sample collection, shipping materials and costs, and analysis will be paid for by the establishment.



4.3 Sample Collection

Using proper sample collection technique is important to ensure that samples provide the best measure of sanitary conditions at the establishment. It is also important that results are accurate and reliable so that they can be used to support the decision made in the hazard analysis that *Lm* or *Salmonella* is not reasonably likely to occur in the product. FSIS sampling procedures will be used.

4.4 Laboratory and Laboratory Methods

Samples collected will be analyzed by the USDA, AMS, NSL-Gastonia. The cost of sample collection, shipping materials, and analysis will be paid for by the establishment. Laboratory methods will be appropriate for the intended purpose, meaning that the test will effectively detect low levels of potentially injured *Lm* or *Salmonella* on food contact or environmental surfaces, including brines, if appropriate. NSL-Gastonia will follow the methods in the FSIS Microbiology Laboratory Guidebook (MLG) for the isolation and identification of *Lm* and *Salmonella*.

Organism	Method	Analytical Sample Size
<i>Salmonella</i> spp.	FSIS MLG 4.05 and 4C.03.	325 g
<i>Listeria monocytogenes</i>	FSIS MLG 8.07 and 8A.04.	25 g or 125 g

5. Information Sharing

AMS will notify the establishment of results. AMS will also notify FSIS of positive pathogen results, send FSIS an isolate of the pathogen, and share data electronically with FSIS.