



February 1, 2010

David Goldman, M.D.
Assistant Administrator, Office of Public Health Science
Food Safety and Inspection Service
United States Department of Agriculture
Jamie Whitten Building
Room 341-E
Washington, DC 20250

RE: Risk assessment for non-intact beef steaks

Dear Dr. Goldman:

On December 24, 2009, the Food Safety and Inspection Service (FSIS or the agency) initiated a recall (FSIS-RC-067-2009) of *ca.* 248,000 pounds of mechanically tenderized beef steak associated with illnesses caused by *Escherichia coli* O157:H7. The American Meat Institute (AMI) treats each recall very seriously because of the adverse health risks they present for consumers. Recalls also can serve as a vehicle for the industry to learn more about a foodborne illness outbreak and the cause or causes of that outbreak. That information, in turn, can assist the meat and poultry industry and other stakeholders in implementing better processes or procedures that can help eliminate further outbreaks.

In the above-referenced recall, as in some other recalls, the underlying cause of the illness is unclear. Were the products that caused the illnesses mechanically tenderized only, mechanically tenderized and then marinated by a solution in a tumbler or by needle injection? Gleaning the correct information from this, and other, recalls can be very helpful in developing strategies and procedure to prevent future outbreaks.

AMI has conducted a review of available information regarding illness-related recalls linked to mechanically tenderized beef products. From this review AMI has determined that all of the recalls due to outbreaks were related to the consumption of marinated or enhanced steak products. (See Table 1 below.) Because of potential cross contamination issues, the recalled product may include more than just the implicated product.

Table 1. Analysis of Mechanically Tenderized and/or Marinated Beef Products Associated Recalls

Year	Recall Number	Product	Illnesses	Marinated	Mechanically Tenderized
2000	NA	Beef steak	2	Unknown	Yes
2003	FSIS-RC-028-2003	Bacon-wrapped beef steaks	10	Yes	Yes
2004	FSIS-RC-033-2004	Beef steaks	4	Yes	Yes
2007	FSIS-RC-019-2007	Beef steaks	5	Yes	Yes
2007	FSIS-RC-023-2007	Ground Beef and steaks ^a	NA	No	No
2007	NA	Beef Steak (Cooked tri-tip)	27	Unknown	Unknown
2007	NA	Beef Steak (Tri-tip)	ca 24	Unknown	Unknown
2009	FSIS-RC-067-2009	Beef steaks	7 ^b	Yes	Yes

^aRecall was initiated due to ground beef illness and expanded to include mechanically tenderized products. No illnesses were associated with mechanically tenderized steaks. Communication with FSIS and recalling company)

^bIllnesses associated with recalled product. The Centers for Disease Control and Prevention report 14 additional illnesses associated with the outbreak strain, but no link to recalled product, for a total of 21 illnesses. FSIS confirmed that all of the steak exposures for ill people were due to product that was first mechanically tenderized and then marinated.

Based on the data presented in Table 1, AMI requests that the agency use this information to revise the agency's "Comparative Risk Assessment for Intact (Non-Tenderized) and Non-Intact (Tenderized) Beef, March 2002". Marinated or enhancement solution-added products were not differentiated in the 2002 risk assessment. That is, the types of steak products that have caused illnesses have not been addressed in the agency's risk assessment. Additionally, on June 12, 2009, a letter submitted to Secretary Vilsack by the Safe Food Coalition had no mention of this marinated category of steak products.

It is an imperative that the process of manufacturing beef steaks be understood so that the risk assessment of mechanically tenderized beef steaks is meaningful and both benefits public health and provides useful information to the regulated industry. Because the marinated or enhanced mechanically tenderized products are a small portion of the entire beef steak production volume, a more focused approach will more likely help the agency and the industry as we collectively work to prevent illnesses associated with mechanically tenderized and marinated steak products.

Thank you for your consideration and timely response to this request. If AMI can be of further assistance, please contact me either by email at SGoltry@meatami.com or 202-587-4254.

Sincerely,



Scott Goltry
Vice President
Food Safety and Inspection Service

cc: Al Almanza
Phil Derfler
Kenneth Petersen