

# testing 1, 2 and 3

**With intensified verification testing for listeria, FSIS is migrating into the arena of risk-based analysis. It's not simply to assess the inherent risk of products, but also the three alternatives processors use to contend with the pathogen.**

USDA's Food Safety and Inspection Service raised eyebrows last spring when it announced plans to perform intensified verification testing for listeria monocytogenes at 200 U.S. plants this year.

It's not that listeria counts haven't fallen significantly since FSIS implemented its zero-tolerance policy for the pathogen; it's that too many consumers continue to fall ill to listeriosis as a result of eating contaminated food, says FSIS Administrator Barbara Masters. Healthy People, a disease-control initiative implemented by President Clinton, envisioned a listeria infection rate of 0.25 cases per 100,000 persons by 2005, a goal that medicine, science and industry failed to meet, Masters explains.

Intensified verification testing calls for product, product-contact and environmental swabs in plants that FSIS believes could be problematic owing to the type or volume of products they process, the measures they are taking to control the pathogen or some combination thereof. It's the type of risk-based analysis that



FSIS Under Secretary Richard Raymond says he has in mind for all avenues of meat processing, not just processes associated with listeria.

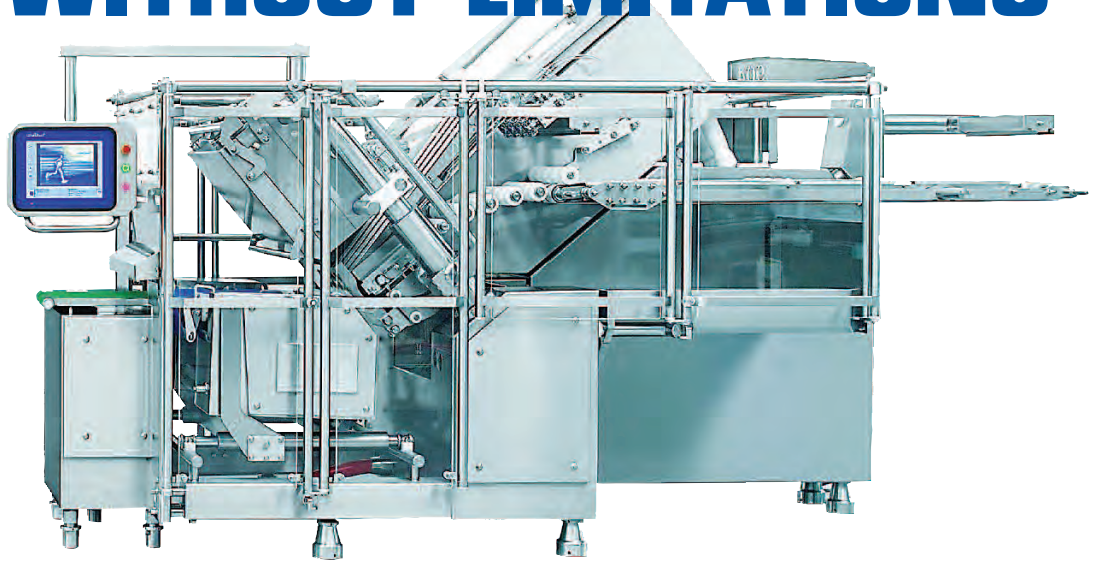
In addition to other areas, FSIS is taking a close look at which of three listeria control alternatives a processor is implementing. In theory, processors employing Alternative 1, which combines a post-lethality treatment and an antimicrobial agent to limit listeria growth would be a less likely candidate for intensified verification testing than processors opting for Alternative 2, which calls for a post-lethality treatment or antimicrobial testing, or Alternative 3, which relies solely upon sound sanitation practices.

"We do believe that sanitation alone can be effective," says Masters, "but if the processor is making lunchmeat and deli products, and using only sanitation

to control listeria, they can probably count on us performing intensified verification testing. That's an area we want to target. If sanitation proves effective, great, and if not, then perhaps there are ways for us to help."

To that end, FSIS is working with Alternative 1 processors to help them optimize their sanitation programs, or perhaps migrate to Alternative 2. "We've found that even small and very small plants can add an antimicrobial inhibitor to their programs, and have begun issuing guidance materials for processors of that size. We like to use examples of initiatives that have worked well with other processors. The bottom line is that we've seen some small and very small plants migrate from Alternative 3 to Alternative 2, and we've also seen some plants in Alternative 3 be very successful." ☺

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