



January 2nd, 2025

Re: Beef Primal and Trimmings Antimicrobial Intervention

To Whom It May Concern,

Tyson Foods, Inc. beef plants apply multiple hurdle interventions to carcasses, primals, and trimmings after the final slaughter CCP intervention for the purpose of reducing microbial contamination that may be present on the surface of the carcass or cuts.

During carcass chilling after slaughter, we apply a pathogen reducing processing aid through the carcass spray chill system. We also have interventions in place at all plants for application of pathogen reducing processing aid sprays to the surface of finished primals prior to final packaging. In addition, we spray a pathogen reducing processing aids onto surfaces of the fresh beef trimmings prior to further processing into ground beef.

Under USDA rule, 'processing aids' are considered GRAS by the FDA, and do not have to be included in the products ingredient statement on the label. Processing Aids fall under approvals listed in [FSIS Directive 7120.1](#). Additionally, being listed in FSIS Directive 7120.1 means that there is efficacy data submitted to USDA that supports its use for pathogen reduction when used as described in the approval.

Q2: What is the definition of a processing aid?

Answer: According to the Food and Drug Administration's (FDA) regulations (21 CFR 101.100 (a) (3) (ii)), the definition of a processing aid is:

- a. Substances that are added to a food during the processing of such food but are removed in some manner from the food before it is packaged in its finished form.
- b. Substances that are added to a food during processing, are converted into constituents normally present in the food, and do not significantly increase the amount of the constituents naturally found in food.
- c. Substances that are added to a food for their technical or functional effect in the processing but are present in the finished food at insignificant levels and do not have any technical or functional effect in that food.

For purposes of validation of microbial reduction, these 'processing aids' have been scientifically tested in our plants utilizing generic 'indicator' microorganisms. Our data demonstrates efficacy of the system's ability to reduce bacteria that may be present on the surfaces of the meat. Although not deemed as CCP's, all of these pathogen reduction processing aids serve as important additional hurdles in the total food safety systems of the Tyson beef plants.

Sincerely,

A handwritten signature in black ink, appearing to read "Alison Griffino".

Alison Griffino
Senior Director, Food Safety & Quality Assurance
Tyson Foods, Inc. – Beef Division