

Frequently Asked Questions

Walmart Raw Ground Beef | Bison Initiative

Question: Are all ground beef and bison products required to comply with this initiative?

Answer: No. Only suppliers providing fresh or frozen raw ground products sourced from a ruminant to Walmart and/or Sam's Club must comply with this initiative. Pre-cooked products containing ground products are exempt.

Question: What ground products are required to comply with this initiative?

Answer: Any ground ruminant is required to comply with this initiative. Examples include, but are not limited to, beef, bison, buffalo, lamb, and venison (i.e., deer, elk).

Question: If my raw ground product contains other animal proteins not required to comply, do I still need to comply with the initiative?

Answer: Yes. Suppliers that provide fresh or frozen raw blended ground products, such as beef and pork, must ensure the beef components used are compliant with the initiative. In this example, if you are receiving pre-ground beef, the facilities where you source your ground beef will need to comply with our requirements.

Question: If I source raw materials from a facility that has an *Escherichia coli* O157:H7 testing program that meets the Walmart requirement, do I also have to implement the program within my facility?

Answer: No. As long as you verify that their program meets the Walmart requirements and each lot is accompanied by a COA verifying negative test results, you do not have to implement the program within your facility. It should be noted that this testing program is required of all products included in the scope of this initiative, even products that fall under the jurisdiction of FDA.

Question: Does the *E. coli* sampling plan have to be conducted on combos?

Answer: No. While most suppliers implement their USDA-approved sampling plan on combos, if USDA has reviewed and approved an *E. coli* sampling plan at another acceptable place within your process, and that sampling plan meets Walmart requirements, it will be accepted. Suppliers may be required to submit documentation or proof of USDA acceptance.

Question: How do I know if I am a vertically integrated supplier?

Answer: You are a vertically integrated supplier if you source raw materials from a slaughter (harvest/evisceration) facility that is owned/controlled by your company. Suppliers who have slaughter and grind processes in the same facility are vertically integrated. Similarly, suppliers who ship raw materials from their owned slaughter facilities to a separate grind facility are also considered vertically integrated suppliers. You are NOT a vertically integrated supplier if all the raw materials you use are sourced from facilities which are not owned/operated by your company.

Question: What slaughter facilities should I disclose?

Answer: Only suppliers who are vertically integrated are required to disclose their owned slaughter facilities that provide raw materials to their grind processes. If you are a vertical supplier who sources raw materials from non-company owned slaughter facilities, you do not need to disclose those locations.

Question: What qualifies as an intervention within my process?

Answer: Interventions can be any point within your process that provides a reduction of enteric pathogens. Some suppliers may refer to some of their interventions as processing aids. Examples may include hot water cabinets and/or the use of peracetic acid, lactic acid, or acidified sodium chlorite.

Question: What is considered an acceptable scientific validation of processes?

Answer: Each facility is required to conduct an in-plant validation of their intervention(s). Please view the Validation Study Guidelines document for detailed information regarding what is an acceptable submission.

Question: If I have multiple facilities using the same intervention(s) and nearly identical processes, do I have to submit a validation study for each facility?

Answer: Yes. However, in these cases if the intervention and methodology for validating the process is the same within the facilities, suppliers can submit a single combined validation study as long as separate raw data sections are provided for each facility to demonstrate that each facility has completed its own scientific validation of their process.

Question: What organisms can I use for validating my process?

Answer: Walmart will accept any validation study using commonly used indicator organisms for enteric pathogens, such as Enterobacteriaceae, coliforms, or *E. coli*. Validation studies using Aerobic Plate Count (APC) will not be accepted.

Question: What if the natural counts within my facility are not high enough to show the required log reduction?

Answer: If the microbial counts are too low to show the required log reduction, it is recommended that suppliers use a USDA-accepted, non-pathogenic surrogate to boost their initial counts. Should a supplier decide to use a surrogate, we recommend purchasing from ATCC. ([ATCC MP-26](#))

Question: After my validation study is reviewed and approved by Walmart, will I be required to repeat the validation study process in the future?

Answer: Any changes impacting your process will require disclosure to Walmart food safety so that we can determine if a new validation study is needed. In addition, certain facilities may be prompted to submit updated validation studies after a certain period of time (such as every 3-5 years.) If a facility is notified that they are required to submit an updated validation study to maintain approval, a timeline will be established with the food safety department to remain in compliance.

Please use the decision trees on the following pages to help determine the log-reduction required of your facility(s) and/or your supply chain.



