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Comments regarding E. coli 0157:H7- Contamination of Beef Products:

Will FSIS ever understand the dynamics of E. coli contamination of beef products? The agency seems to have brain locked upon the role of the beef grinder in the spread of the potentially deadly 0157 bacteria, while slaughter plants continue to produce and ship meat tainted with 0157 bacteria. We should focus our attention in the elimination of 0157 on the finished eviscerated cattle carcass rather than placing the responsibility on grinders who were not responsible for the original 0157 contamination. How can this bacteria continually defeat the best thought HACCP plans on the slaughter floor?

The idea that grinding plants should incorporate purchase specifications to help control the receiving of 0157 meat is akin to utilizing a bandaid to stop a severed artery. Just three years ago grinders were warned not to test for 0157 at receiving, by a large beef supplier, because a positive would result in the grinder being billed for the recall costs incurred by that supplier. So in order to receive meat from this supplier, all 0157 testing was curtailed at the receiving dock. As a result, our 0157 testing program moved to our bowl chopper where meats from several suppliers were mixed. The finding of 0157 conveniently became the problem of the grinder rather than the plant producing the tainted meat. Because meats are blended to control fat levels, we are unable to positively identify the source of contamination, should it occur. FSIS, great job of placing the responsibility where it rightfully belongs!

Recommending that grinders no longer mix meats from various sources is another example of the tail wagging the dog. If raw materials received are certified 0157-free, mixing of raw materials would not present a problem. Implementing this segment of the rule would place a greater strain on grinders in their efforts to control fat levels and cost of goods produced for the American public. It is time FSIS looks at the beef processing business in Australia and apply technologies Australian producers have used to certify loads 0157 free. It appears the SSOP and animal handling regime in Australian plants exceeds the expectations set up for the US producers.

The key to controlling the spread of the 0157 bacteria, in my opinion, is to place greater inspection focus in the slaughter process. Walking into a modern beef slaughter plant provides a contrast in where the importance in inspection lies. You can find in upwards of 6 inspectors

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performing pathological examinations of the entrails and carcasses while no one is found inspecting the bunting and evisceration process. The cross contamination of dressed carcasses is not occurring at the pathology inspection table.

Site studies indicate a significant number of cattle (anywhere from 2 to 28 percent) have the 0157 bacteria inherent to their digestive systems. What better place to curb the cross contamination than at the slaughter floor. In addition, animals entering a processing plant with caked manure and dirt on their carcasses present a significant opportunity to introduce 0157 to the mix during the dehiding process.

Overall, the FSIS proposal of 0157 rule changes misses the mark again in its the quest to eliminate 0157 from America's beef products. Intervention steps may reduce the E. coli numbers, but elimination of the pathogen in our food supply has been a stark failure. I would suggest moving the rule-makers to the kill floor within a modern beef plant to gain an intimate knowledge of where and how the cross-contamination occurs. Armed with this knowledge, a more common sense approach may be formulated to alleviate the threat from E.coli 0157H:7 contamination in our ground beef supply.

Best regards,



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