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December 6, 2002

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Docket No. 00-022N  
USDA, FSIS  
Room 102, Cotton Annex  
300 12<sup>th</sup> Street, SW  
Washington DC 20250-3700

00-022N  
00-022N-4  
Joe Harris

Re: Docket No. 00-022N – “*E. coli* O157:H7 Contamination of Beef Products,” *Federal Register*, October 7, 2002, Vol. 67, No. 194, pg. 62325-62334

The Southwest Meat Association, representing meat packers and processors in Texas and several other states, respectfully submits the following comments in response the FSIS request for such on the above referenced document.

This publication requires slaughter establishments and others that produce raw beef products to re-evaluate the likelihood of occurrence of *E. coli* O157:H7 (H7) in their processes. It is critical that adequate scientific data be available to help support those evaluations. We strongly believe that the key to preventing the presence of this pathogen in ground beef is to keep it off of the carcasses in the first place. The consensus seems to be that the “point of entry” for H7 into the meat supply is primarily its transference from the hide to the carcass during slaughter/dressing. Thus, regardless of what other interventions are implemented by a slaughterer, the most important means of prevention would be to minimize the occurrence of this transfer from the hide to the carcass. In order to achieve the requirement that carcasses have “below detectable levels” of H7 and, essentially, no *Salmonella* (see Pathogen Reduction: HACCP Final Rule), the combined reduction of these organisms by implemented interventions must not be exceeded by the load present on the carcasses. For example, even a packer that has validated its interventions to deliver a 3.5-log reduction will fail if the load on the carcass going into the intervention steps is 5.0-log.

Considering all of the above, we believe that small packers are at a tremendous “knowledge disadvantage” in that they often do not have the enormous volumes of data, nor do they have the resources necessary to obtain

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the data, that are required to make informed assessments of their processes and what intervention steps are needed. The growing opinion trend seems to be that every processor needs to implement every available technology/intervention to reduce pathogens on carcasses. What if they implement sanitary dressing procedures to the point that so-called "multiple interventions" become redundant and unnecessary? It only is important that they achieve the standard, not how they achieve it.

We are unaware of published data that small to medium sized packers could use to help them assess their processes, the need for interventions and which one(s), the likelihood of occurrence of certain pathogens on livestock, and, most important, the degree of transference of pathogens from hides to carcasses within various processing environments (especially various size facilities). While we have some anecdotal evidence that many small processors can achieve carcasses that are just as "clean" as those from the large packers, despite the fact that the small packers often do not have many of the better known interventions of the large packers, we are not aware of hard scientific data to support (or refute) that assertion. We have solicited the assistance of the USDA Agricultural Research Service (ARS) in this regard. We believe this to be a significant need in our industry.

Another unknown that would seem important for a packer to effectively assess likelihood of occurrence for *H7* is regional variation in its occurrence on live animals or carcasses. Again, we can only say anecdotally that we are unaware of a single *H7* recall originating from a Texas packing plant, regardless of size. For whatever reason, *Salmonella* appears to be a "southern" problem, whereas *H7* seems to be more of a "northern" problem. That is a gross oversimplification, but it is an unknown that needs to be considered.

We appreciate the opportunity to submit these comments and we hope they will be taken into consideration as FSIS moves forward with regulatory initiatives aimed at reducing the occurrence of *E. coli* O157:H7 in the beef supply.



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Executive Director