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December 6, 2002



00-022N
00-022N-8
David Meeker

FSIS Docket Clerk
U. S Department of Agriculture
Food Safety and Inspection Service
Room 102, Cotton Annex Building
300 12th Street, S.W.
Washington, DC 20250-3700

Re: Draft Notice (Docket No. 00-022N): *E. coli O157:H7* Contamination of Beef Products

Dear Ms. Riley:

The National Turkey Federation (NTF) appreciates the opportunity to submit comments in response to this draft notice. NTF is the only national trade association exclusively representing all segments of the turkey industry, including growers, processors, breeders, hatchery owners and allied industry. NTF's membership accounts for more than 95 percent of all turkey production and processing in the United States.

This letter is submitted in support of the American Meat Institute's (AMI) comments, dated November 27, 2002. While the provisions of the draft notice do not directly affect the turkey industry, we are indirectly affected by the agency's regulatory interpretations of HACCP and future enforcement actions, not necessarily in response to *E. coli O157:H7*, but to any of the other pathogens found in turkey products. The agency's draft notice sets a dangerous regulatory precedent that we believe will in time affect the policies governing all meat and poultry inspection.

Generally, the draft notice suggests that at any level whatsoever, *E. coli O157:H7* is a hazard reasonably likely to occur. We disagree with this interpretation and agree with AMI that the agency should specify the level (prevalence, concentration) of regulatory concern and the methods used to define that level.

As with the above-mentioned issue, we agree with all the points put forth in AMI's comments on the draft notice. We encourage you to consider their comments.

Respectfully submitted,

David Meeker
Vice President, Scientific & Regulatory Affairs
National Turkey Federation

