

July 18, 2001

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FSIS Docket Clerk
Docket No. **00-048-N**
United States Department of Agriculture **30-048N**
Food Safety and Inspection Service **30-048N-9**
Room **102**; Cotton Annex **AFFI, AMI, FMI, GMI,**
300 12th St., SW **DFA, NFI, NFPA, NTF**
Washington, DC 20250-3700

Re: Relative Risk to Public Health from Foodborne *Listeria monocytogenes* Among Selected Categories of Ready-to-Eat Foods; Draft Risk Assessment Document and Risk Management Plan; Docket No. 99N-1168; 66 FR 5515

Dear Sir or Madam:

The *Listeria monocytogenes* (LM) Working Group appreciates the opportunity to submit the attached quantitative, technical review of the above-referenced draft risk assessment prepared by the Food and Drug Administration (FDA) and Food Safety and Inspection Service (FSIS). The LM Working Group is a coalition of trade associations and companies representing the food industry. Since 1994, the LM Working Group has worked with government agencies to foster appropriate, science-based policies for regulation of *Listeria monocytogenes* in ready-to-eat foods.

Novigen Sciences, Inc. reviewed the FDA/FSIS "Draft Assessment of the Relative Risk to Public Health from Foodborne *Listeria Monocytogenes* Among Selected Categories of Ready-To-Eat Foods" for the LM Working Group. Novigen looked at the "responsiveness" of the overall exposure model to changes in data inputs and assumptions relating to the level of *L.monocytogenes* contamination at retail or post-retail growth for selected food categories, and consumer practices for deli meats and frankfurters. Novigen examined various parameters of the exposure assessment in order to determine how data inputs and key assumptions influence the exposure distributions for intake per serving and intake per year.

The LM Working Group supports cooperative efforts among government, industry, and consumers to enhance food safety, and advocates prioritization of food safety challenges according to science-based assessments of consumer risk. Accordingly, the LM Working Group applauds the agencies' efforts to evaluate the risks posed by *Listeria monocytogenes* using a science-based analysis. The LM Working Group firmly supports science-based risk assessments as the most intellectually sound approach to addressing the risks of foodborne illness and encourages the continued use of such assessments by the agencies. We trust the attached analysis will provide FDA and FSIS with information useful in refining the risk assessment.

Sincerely,

American Frozen Food Institute

American Meat Institute

Food Marketing Institute

Grocery Manufacturers of America

International Dairy Foods Association

International Ice Cream Association

Milk Industry Foundation

National Cheese Institute

National Fisheries Institute

National Food Processors Association

National Turkey Federation