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February 1, 2002

FSIS Docket Room
Docket #01-047N
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102, Cotton Annex
300 12th Street SW
Washington, DC 20250-3700

01-047N
01-047N-2
Archie Rae McFarland

Re: Docket No: #01-047N

Dear Sir/Madam:

The responsibility of the Codex Committee on Food Additives and Contaminants is to pursue the protection of the health of the consumer and to ensure fair practice in the food trade; therefore the CCFCA cannot continue to allow polymer contaminants from processing equipment components to be included in our food.

The Codex charter demands the pursuit of contaminants by promoting, adopting and implementing food standards and codes of practice and other guidelines to provide "pure" food from the farm to the table free from contaminants in the food chain.

Food equipment and employee apparel is constantly found in many lots of poultry trimmings and other red meat and seafood pieces used in industrial processing.

One of Codex's responsibilities is to consider methods of analysis for determination of contaminants in food. Elaborate methods of detection are good and proper but secondary when determination of contaminants is organoleptical or simple to detect by sight or feel.

The presence of blue apparel, including blue rubber or plastic hand and body coverings, are easy to see. Not so easy to see is the presence of non-colored plastic belting used in conveying and pressure processing food using heavy polymer belting that **easily** sheds component chunks.

All conveying, holding, and pressure processing equipment with plastic or rubber components (Polymer) must be supplied with a dye easily seen organoleptically. Good visual colors, for example, are purple or deep blue food dyes.

To facilitate scientific and analytical removal of suspect polymer contaminants, magnetic material must be added in sufficient amounts to render the contaminants detectable to electromagnetic energy, for instance metal detectors or the equivalent. In addition under **some** conditions, material, which fluoresces, can be added and detected by black light. For those components from a food plant which are found to be a contaminate with non-magnetic components, the materials including the 300ss series will be provided with a magnetic material additive or coating for easy detection.

The **CCFAC** has the obligation to keep ~~the~~ food chain free from contaminates. Polymer from conveyors, apparels including gloves, and pressure contact surfaces become part of the processed food. When the equipment and apparel become contaminates and **are** accidentally added to the food, Codex, the FDA and the **USDA** are obligated to remove the contaminates from my food **or** have the contaminated food taken out of the food chain.

Never allow the contaminates to go unheeded.

Your prompt action is appreciated.

 2-1-02
Archie Rae McFarland
Professional Food Technologist since 1964.