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February 20, 2003

FSIS Docket Room
Docket 03-005N
U.S. Department of Agriculture
Food Safety & Inspection Service
Room 102
Cotton Annex Building
300 12th Street S.W.
Washington D.C. 20250-3700

03-005N
03-005N-4
John M. Rammel

Subject: Response to Draft FSIS Risk Assessment for Listeria in Ready-to-eat Meat and Poultry Products

A reading of the above draft shows that no consideration has been given to sampling the ambient air in establishments that produce certain RTE products. Iowa State University has proven, that not only is listeria, salmonella and e-coli *airborne*, but these contaminants can remain airborne *up to several days* after surface cleaning. Unless the airborne pathogens are killed, these pathogens can re-contaminate recently cleaned surfaces.

FSIS is implementing more preventive measures to control listeria by testing surfaces, but not the air. Query: how does the listeria that spreads from drains or from moving equipment end up on the food products? In some cases, employees can spread contamination, but how else can this occur? Through the Air! Unfortunately, most food companies merely focus on surfaces and ignore the air. The reason could be because they can't see, smell or taste it. Now with our unique "spatial mapping" multi-color plant layouts, you are able to see the contaminants that are in the air before installing the IAF Anti-Microbial/Anti-Spoilage system, as well as confirm that they have been removed after using the IAF system.

The fact that the subject FSIS directive does not even consider testing for airborne pathogens is in our opinion a major oversight that should be corrected. We would be pleased to elaborate on our position at any time.

Sincerely,

John M. Rammel
Chairman & CEO

JMR:cm
FSIS-022003