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CANADIAN MEAT COUNCIL
CONSEIL DES VIANDES DU CANADA

Thursday, April 08, 2004

FSIS Docket Clerk, Docket
03-038IF, Room 102, Cotton Annex,
300 12th Street, SW.,
Washington, DC 20250-3700

Docket No. 03-038IF

Additional comments on the Proposed Rule “Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems”, as published in the *Federal Register* of March 8, 2004. (DATES: This interim final rule is effective January 12, 2004. Comments on this interim final rule must be received by April 12, 2004.)

SUMMARY: The Food Safety and Inspection Service (FSIS) is issuing this interim final rule on meat produced by advanced meat recovery (AMR) systems. This new regulation is a prophylactic measure designed, in part, to prevent human exposure to the Bovine Spongiform Encephalopathy (BSE) agent by ensuring that AMR systems are not a means of introducing central nervous system tissue into product labeled as “meat.” In addition to the measures related to BSE, FSIS is finalizing restrictions related to bone solids and bone marrow for livestock products. This rule articulates the criteria that FSIS will use to ensure that AMR products can be represented as “meat” and thus are not adulterated or misbranded. Finally, the Agency is requiring that Federally-inspected establishments that process the carcasses or parts of cattle develop, implement, and maintain written procedures for the removal, segregation, and disposition of specified risk materials (SRMs), including non-complying product from beef AMR systems. Establishments must incorporate these procedures into their HACCP plans or in their Sanitation SOPs or other prerequisite program. FSIS is issuing this document as an interim final rule because of the discovery of a BSE-positive cow in this country.

The Canadian Meat Council appreciates the opportunity to provide further comments on the Proposed Rule “Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems”, that was published in the *Federal Register*: January 12, 2004 (Volume 69, Number 7)]. The Canadian Meat Council is Canada’s national trade association of federally inspected meat packers and processors.

We support changes to regulations that are designed to prevent human exposure to the BSE agent by ensuring that AMR systems are not a means of introducing central nervous system tissue into product labeled as “meat”.

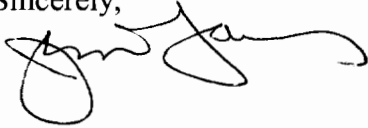
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However, the Canadian Meat Council does not support the banning of Mechanically Separated Beef (MS Beef). Rather we would recommend a change to the definition of mechanically separated beef such that the use of vertebral bones be banned in the production of MS Beef. This would ensure that no tissues of concern such as spinal cord and dorsal root ganglia would be incorporated into the final product. The banning of vertebral column from MS Beef would also remove the requirement for testing of Central Nervous tissue in MS Beef since there would be none present. The current Canadian standard for MS Beef does not allow for the use of skulls from cattle of any age. In addition manufacturers producing MS Beef have stopped using vertebral columns from beef of any age since May 2003. The Canadian Meat Council is supporting amendments to Canadian regulations to prohibit the use of vertebral columns from beef of any age to be used for the production of MS Beef.

The Canadian Meat Council does not support allowing detached spinal cord to be used for edible rendering- it should only be permitted in inedible rendering.

We appreciate the opportunity to submit our comments on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Laws', with a stylized flourish extending to the right.

James Laws
Executive Director