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Joseph A. Miller

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

RE: Docket No. 03-038IF; Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems

The North American Meat Processors Association (NAMP), representing meat and poultry processors across the U.S. and Canada, appreciates this opportunity to comment upon the interim final rule affecting AMR systems.

NAMP stands behind FSIS and its goal and mission to ensure a safe food supply. However, the regulations FSIS enforces to ensure that safe food supply needs to be based upon sound science and enforced cost effectively.

In that regard, we are aware that the methods in which some AMR machines are operated do result in CNS-type material ending up in the meat. However, if that product is from animals less than 30 months of age, then we believe the risk presented by such material is so minute that it does not pose any real risk to the consuming public. The only animals which have been found to have been infected by BSE and been under 30 months of age, all of which are in countries other than the U.S. and Canada, are those that appear to have been fed large quantities of BSE-infected material starting at an early age.

Controls have been in place for many years in both the U.S. and Canada to ensure that animals under 30 months of age would not be fed these materials, nor would they be able to eat the amounts of BSE-infected material needed to give them the disease. However, we do agree that CNS-type tissue derived from cattle younger

In regard to cattle younger than 30 months of age and animals other than cattle, and whether product from them that contain CNS-type material should be allowed in edible rendering, NAMP believes such materials pose a small negligible risk at worst, and therefore should be allowed in edible rendered products.

Our understanding is that there is no science which indicates that edible rendered products derived from the bones of livestock that may contain CNS-type tissues poses any health risk to the public. As such, we oppose labeling such product that reflects the potential presence of CNS-tissue. We feel that such labeling will cause confusion within the buying public as to what the label actually means and could easily mislead people into thinking that the product poses food safety problems that do not exist. We believe it wrong for USDA FSIS, or any other governmental agency, to allow, or worse, require, labeling that misleads the vast majority of consumers.

We are concerned that in this rulemaking, certain standards are being applied to all AMR processes. If raw materials are free of risk materials and the pressure in creating AMR product is controlled, then the product is safe. Some traditional AMR systems have over-adjusted their pressure in recent years to increase yields, which has led to concerns of CNS tissue in the final product. However, these issues can be easily controlled.

A new technology, de-sinewed minced meat (DMM), not only maintains the integrity of meat structure, but also provides bone levels similar to hand boning, and can provide meat free of CNS tissue. DMM has an improved filtration system that reduces the pressure required to harvest residual meat, while retaining efficient yield levels.

Studies have shown meat produced from this technology to have no CNS tissues present, and that while traditional AMR meat can show the presence of ganglia in staining by GFAP and Synaptophysin, that the DDM system produces ganglia staining identical to hand boned meat, but only in one sample of 31 tested positive; it was attributed to peripheral nerve staining. As such, we believe it incumbent upon the Agency to stay open to technological advances in and to various operating methods of AMR systems that result in a safe product.

We appreciate this opportunity to comment upon this interim final rule.

Sincerely,

Joseph A. Miller

Joseph A. Miller
Executive Vice President

cc: Board of Directors