



**One Meating Place      P.O. Box 269      Elizabethtown, PA 17022**  
Phone: (717) 367-1168      Fax: (717) 367-9096  
Email: [aamp@aamp.com](mailto:aamp@aamp.com)      Website: [www.aamp.com](http://www.aamp.com)

July 3, 2006

Docket Clerk  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
300 12<sup>th</sup> Street, SW  
Room 102 Cotton Annex  
Washington, DC 20250

**RE: Docket No. 05-016N  
The Use of Ingredients of Potential Public Health Concern**

The American Association of Meat Processors (AAMP) is pleased to submit the following comments on Docket No. 05-016N, "The Use of Ingredients of Potential Public Health Concern."

The Association is an international organization whose members include meat and poultry processors, slaughterers, caterers, food service companies, wholesalers, retailers, suppliers, and consultants to the meat and poultry industry. There are 33 state, regional, and provincial associations of meat processors that are also affiliated with AAMP. Majority of our members are small and very small businesses, most of them family-owned and operated.

AAMP agrees with the idea of asking establishments to maintain proper control over the use of ingredients, especially those that present a potential health concern, and over the ingredient labeling of their products. It is imperative that actions are taken by the facility to ensure that their products are both safe for consumers and properly labeled. FSIS suggests that establishments should review their systems as part of their next HACCP plan reassessment to make certain that their plan includes such control. Recognizing "major food allergens," particularly those identified by FALCPA, within products is necessary to avoid food safety hazards and should help reduce the number of unwarranted recalls. It is important for processors to review their processes to provide a confidence that the intended ingredients are used with the proper packaging and the correct labels.

While maintaining proper control over ingredients is very important, AAMP would like to express the importance of keeping this enforcement to the top eight food allergens currently identified in FALCPA. These specific foods and food groups are the major food allergens, which should absolutely be accounted for within labeling and ingredient information. There are many foods or food ingredients which individuals may have some degree of intolerance or possible allergic reaction, but because they are so individualized, it is difficult to predict a response. As long as

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the primary foods identified by FALCPA are recognized within the labeling of processed meat and poultry products, establishments have done their best to prevent allergic reactions.

Processors naturally want their customers to be happy with the products they purchase and establishments should not have any difficulty considering how potential allergens are used within their products. Evaluating the control of these types of ingredients easily fits within a HACCP plan reassessment. As long as inspection personnel are educating establishments prior to verifying the procedures in place, there should be limited problems with compliance.

We encourage FSIS to continue to be transparent and seek input from industry stakeholders in all HACCP compliance Federal Register notices. Because of the importance of this compliance, AAMP has notified its membership of the need to consider the use of ingredients within their next HACCP plan reassessment. It is critical for industry and government to continue to work together toward the goals we share for food safety.

Sincerely,

A handwritten signature in cursive script that reads "Andrea H. Brown".

Andrea H. Brown  
Director of Legislative and Regulatory Affairs

cc: Mark Schad, AAMP President