



State of Oklahoma
Department of Agriculture, Food, and Forestry

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April 11, 2008

Mr. Keith Payne
Docket No. FSIS-2008-0011
United States Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue, SW
Room 1175, South Building
Washington, DC 20250

On behalf of the Oklahoma Department of Agriculture, Food, and Forestry Meat and Poultry Inspection Program, I am submitting comments related to the Shiga Toxin-Producing *E. coli* Public Meeting which was held on April 9 -10, 2008. During this meeting a number of interesting and intriguing proposals were raised by both the presenters and members of the audience as potential methods to reduce or eliminate the incidence of these pathogens in the meat supply.

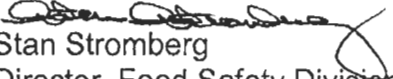
I encourage FSIS to ensure that the activities and policies that are developed to address these pathogens are based on sound science and risk based principles and they are designed to prevent the entrance of these pathogens to the meat supply rather than extending the current policies which are focused on controlling the pathogens after they have been introduced. The focus of FSIS and industry activities to control these pathogens should be on the slaughter/dressing and boning operations. Grinding operations do not introduce STEC organisms into the meat supply, yet these operations are being held responsible for the presence of these organisms in raw ground beef products. This policy only serves to remove potentially adulterated product from commerce, but does not address the prevention or elimination of the pathogens from the food chain. Grinders should continue to verify that the incoming supplies of raw ground beef manufacturing components as well as their finished products are not adulterated by the presence of STEC organisms, but the ultimate responsibility for the presence of these organisms does not rest with the grinder.

It was stated repeatedly during this meeting that the multiple hurdle intervention approach is the most effective manner to address the problem of STEC

organisms. I suggest that this system be reinforced with the major emphasis placed on the prevention of the entry of these organisms or a reduction of the incoming bacterial load to a level that can be controlled by the interventions at the slaughter and boning steps instead of trying to control them downstream in the process.

I encourage FSIS to continue to work with industry, consumer groups and any other interested parties to develop a pro-active plan and policy that can be implemented to address this issue. Hopefully, this meeting will be one of many steps that are taken by the Agency in this process.

Sincerely,


Stan Stromberg
Director, Food Safety Division