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May 27, 2008

Mr. Keith Payne
USDA-FSIS
1400 Independence Avenue, SW
Room 1175 South Building
Washington, DC 20250
Keith.payne@fsis.usda.gov

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2008-0011
2008-0011-7
Lyn O'Brien Nabors

Re: Docket No. FSIS-2008-0011 -- Comments on FSIS Federal Register Notice, April 3, 2008 (Volume 73, Number 65) and Public Meeting; "Shiga toxin-producing *E. coli*. Addressing the challenges, moving forward with solutions"

Dear Mr. Payne:

The International Food Additives Council (IFAC) is an association of manufacturers of food ingredients that are used for their technical and functional effects in foods, including ingredients used as antimicrobial agents in meat and poultry product applications. Such ingredients are used as processing aids, direct and indirect food ingredients, and as food contact substances in meat and poultry products.

These comments are submitted by IFAC in response to USDA's Food Safety and Inspection Service's (FSIS) request for comments published in the April 3, 2008 *Federal Register* and subsequent public meeting regarding issues related to the presence of shiga toxin-producing *E. coli* (STEC) in meat and poultry products.

IFAC commends FSIS for its continued focus on minimizing the incidence of foodborne illness related to STEC organisms, especially in light of the increase in occurrence of human illness attributed to STEC that occurred in 2007, reversing a trend of decrease in such incidence in recent years. Previous FSIS initiatives, such as the Online Reprocessing Rule for post-harvest poultry processing and the Listeria Rule for Ready to Eat meat and poultry products, have led to the adoption of post-harvest interventions, the use of efficacious antimicrobial agents for example, that have significantly contributed to reducing foodborne illness attributed to meat and poultry.

FSIS, academic researchers and industry groups at the public meeting acknowledged that any new initiatives for the reduction of *E. coli* 0157:H7 and other STEC, to be fully effective, must be part of a multi-hurdle food safety strategy in a continuum that starts at the farm and extends to the consumer, recognizing that each individual intervention does not have to be 100% efficient if sufficient hurdles are in place to reduce the prevalence of the pathogen. IFAC fully supports this view. However, we note that such a strategy may involve several federal agencies, e.g. FSIS,

FDA, EPA, that possess regulatory responsibilities in the continuum. We are concerned that multiple agency involvement, review, and sign off can lead to delays, inhibit industry involvement, and suppress commitment of resources to the issue, which could impede the timely testing, approval, and implementation of new technologies.

Consequently, as it moves forward with this initiative, we urge FSIS to work with all other responsible agencies to develop memoranda of understanding or other agreements that will insure optimum coordination and cooperation among agencies in designating fast track status for approval of the desired multi-hurdle technologies. Preliminarily, an interagency process could identify and eliminate regulatory barriers that impede timely development, testing, approval, and implementation of effective interventions. The interagency agreements should then specify individual agency responsibilities, establish methods for interagency coordination, and delineate procedures for rapid review, clearance, and adoption of newly developed food safety initiatives and intervention strategies. Once completed, the agreements should be made available to the public. Such an approach would provide transparency and clarity to the process. It would encourage stakeholders to make the investments of time and resources needed to develop new technologies that will further reduce the risk of foodborne illness from STEC and other pathogens.

Again, IFAC supports FSIS in this most recent initiative to improve food safety. As the process moves ahead, we urge FSIS to work with other responsible governmental agencies to establish more efficient cooperation and coordination of responsibilities to facilitate necessary regulatory reviews and approvals of the new technologies that are needed to further improve food safety from farm to consumer.

Thank you for your consideration to these comments.

Respectfully submitted,

Lyn O'Brien Nabors

Lyn O'Brien Nabors
President