

National Pork Producers Council

122 C Street, N.W., Suite 875
Washington, D.C., 20001
(202) 347-3600
FAX (202) 347-5265

RECEIVED
FSIS DOCKET ROOM
01 SEP 10 PM 3:50

2702

September 10, 2001

FSIS Docket Clerk
Docket No. 97-013P
U.S. Department of Agriculture
Room 102, Cotton Annex
300 12th Street, SW
Washington, DC 20250-3700

97-013P-2702
97-013P
Barb Determan

Dear Docket Clerk:

The National Pork Producers Council (NPPC) appreciates the opportunity to present our comments on Docket No. 97-013P, the Food Safety and Inspection Service (FSIS) proposed rule on "Performance Standards for the Production of Processed Meat and Poultry Products." NPPC is supportive of the FSIS proposal to eliminate the regulations for trichinae in pork products due to inconsistencies with HACCP and becoming unnecessary if the proposed lethality performance standards for ready-to-eat (RTE) products become final.

NPPC is a national organization that represents, through forty-four affiliated state associations, the nation's pork producers. NPPC membership accounts for most of America's commercial pork production. The U.S. pork industry is one of this country's most important agricultural sectors, accounting in a typical year for more than \$10 billion in annual farm sales. U.S. pork production generates overall economic activity of approximately \$6 billion annually and supports an estimated 600,000 American jobs.

The U.S. pork producers clearly play a key role in ensuring the food they produce is safe and it is one of the highest priorities in the industry. The USDA's National Animal Health Monitoring System's National Swine Survey in 1995 reported a trichinae infection rate in U.S. swine of 0.013%. Farm management strategies for eliminating the risk of infection have been well researched and can be implemented in most production units. The pork industry, in cooperation with FSIS, the Animal and Plant Health Inspection Service, cooperating producers, and two pork processing plants, are pilot testing the Trichina Certification Program to certify that the producers have adopted production practices to reduce or eliminate the risks of trichinae infections.

Due to the low prevalence of trichinae infection, the ease of implementing on-farm strategies to manage the risk, the inconsistencies with HACCP and the use of the proposed lethality performance standards for RTE products, NPPC is supportive of FSIS removing the regulations for treatment of pork products to destroy trichinae. We believe a change to more flexibility for


The Other
White Meat.

addressing the extremely rare incidence of trichinae will continue supplying a safe pork product to the consumer.

Pork producers realize that we are the first link in the food chain and stand ready to do our part to produce the highest quality and safest product and will continue to work with the entire food chain to provide consumer confidence in our products. We look forward to continuing the cooperation with FSIS on this issue and appreciate FSIS' participation in development of the Trichinae Certification Program.

Sincerely,

A handwritten signature in cursive script that reads "Barb Determan". The signature is written in black ink and is positioned above the printed name and title.

Barb Determan
President