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March 17, 1999

FSIS Docket Clerk  
Docket Number 97-068N  
US Department of Agriculture, FSIS  
Room 102 Cotton Annex  
300 12th Street Southwest  
Washington DC 20250-3700

To Whom It Concerns:

Excel Corporation, a Wichita, Kansas based processor of beef and pork appreciates this opportunity to comment on USDA's proposal to expand its current policy with regard to the presence of E.coli 0157:H7.

Under current practice, E.coli 0157:H7 is considered an adulterant only when it is found in ground beef. This new policy would expand the policy to include mechanically tenderized meats and other types of nonintact meats. We encourage USDA to hold this policy in abeyance until a thorough risk assessment can be completed.

Excel is particularly concerned about the policy as it relates to tenderized products. Portion controlled steaks for the foodservice industry are often tenderized by piercing the meat with needles. This process has been used for many years and is quite similar to the home kitchen practice of using a meat mallet.

E.coli 0157:H7 can exist, albeit very rarely, on the surface of meat not within the muscle. We believe the mechanical tenderization process does not spread contamination. Research conducted at Kansas State University has shown no significant difference between steaks that were inoculated with E.coli 0157:H7, then tenderized, versus those that were inoculated and not tenderized.


During the processing of mechanical tenderized steaks, good manufacturing practices (GMPs) are in place that reduce this risk. Typically, these GMPs include: 1) prior to the tenderization process, the exterior surface of the carcass is usually trimmed to conform to industry standards of minimal fat cover on sub primals; 2) in our process, the whole muscle meat comes from carcasses that have been exposed to pathogen reduction interventions that have been verified to reduce microbiological levels on the meat surface; and, 3) before tenderization, the meat is inspected for visual contaminants that would be removed prior to needle tenderization.

According to the Centers for Disease Control, there has never been any E.coli 0157:H7 related illness associated with tenderized steaks. We do not believe this policy would enhance public health.

We again ask that the policy should be held in abeyance until a thorough risk assessment is completed. Thank you for your consideration of our views on this important issue.

Sincerely yours,

EXCEL SPECIALTY PRODUCTS

A handwritten signature in black ink, appearing to read 'Ed Whipkey', with a large, stylized flourish at the end.

Ed Whipkey  
General Manager