



GROCERY MANUFACTURERS OF AMERICA
MAKERS OF THE WORLD'S FAVORITE BRANDS OF
FOOD, BEVERAGES, AND CONSUMER PRODUCTS

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March 22, 1999

FSIS Docket Clerk
Docket No. 97-068N
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102, Cotton Annex
300 12th Street, S.W.
Washington, D.C. 20250-3700

Re: Policy Statement – Beef Products Contaminated with *E. coli* O157:H7

Dear Sir or Madam:

The Grocery Manufacturers of America (GMA) welcomes this opportunity to comment on the Food Safety and Inspection Service's (FSIS or the agency) recently announced policy concerning beef products contaminated with *E. coli* O157:H7. GMA is the world's largest association of food, beverage and consumer brand companies. With U.S. sales of more than \$430 billion, GMA members employ more than 2.5 million workers in all 50 states. The organization applies legal, scientific and political expertise from its member companies to vital food, nutrition and public policy issues affecting the industry. Led by a board of 44 Chief Executive Officers, GMA speaks for food and consumer product manufacturers at the state, federal and international levels on legislative and regulatory issues. The association also leads efforts to increase productivity and efficiency in the food industry.

The United States has the safest, most abundant food supply in the world. GMA has long-endorsed the application of sound science and thoughtful risk assessment techniques to further improve the level of food safety Americans enjoy. FSIS's 1996 Pathogen Reduction Rule, which requires hazard analysis critical control point (HACCP) production systems in meat and poultry plants, represented an important first step toward science-based regulation on a broad scale.

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Further work, however, is needed. Improving the safety of our food supply requires a multi-faceted approach that focuses on the institution of scientifically-based, preventive measures at all stages of food production. End product testing for *E. coli* O157:H7 or any other pathogen does nothing to address the conditions which led to introduction of the pathogen in the first instance. The value of testing for improving the safety of the food supply, therefore, is severely limited. Consequently, GMA has long opposed the notion, put forth by some, that we can somehow test our way to food safety.

In light of these long-standing views, GMA does not support the agency's recently announced policy expanding its *E. coli* O157:H7 adulteration policy to include non-intact beef products and trimmings, as well as ground beef. In GMA's view, the policy represents little more than a prelude to an expanded testing program by the agency. As discussed above, testing for *E. coli* O157:H7 or any other pathogen should not be advocated by the agency as a sound prevention system. Expansion of any testing program may give the agency short-term applause but in reality will only provide consumers with a false sense of security. Meaningful improvements in food safety require measures to address prevention, not end-product sampling which would only provide a brief "snap shot" view of conditions at the end of the production line.

GMA and its member companies are committed to working cooperatively with the agency to develop science-based solutions to the challenge of ensuring food safety. The agency's recent policy announcement with respect to *E. coli*, however, is not grounded in science nor does it offer solutions to the challenge of pathogen control. GMA, therefore, opposes the policy and urges the agency to return its attention to those areas that have the potential to yield significant improvements in product safety.

Please contact me if I can provide any additional information that may be helpful to the agency in considering the merit of its *E. coli* adulteration policy.

Sincerely,



Stacey A. Zawel
Vice President, Scientific & Regulatory Policy