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FOODS, INCORPORATED

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McDonald's

19 March 1999

TO: Food Safety and Inspection Service

Re: Comments on the E. coli 0157:H7 Policy Clarification

- ◆ The FSIS should expressly permit the testing of carcasses to determine effectiveness of intervention technologies. The best control monitoring point is the carcass. Suggest that 1/300 carcasses be tested using the sample points that are currently being used as generic E. coli.
- ◆ A slaughter facility undergoing this process needs to be exempt from testing downstream. This exemption needs to be extended to the final end product produced with all exempt raw materials. This exemption must be extended to all customers.
- ◆ The current requirement that a establishment have six months worth of negative findings to be eligible for less rigorous agency testing be eliminated. An alternate plan should be a 13 test rolling window to evaluate the process. If positives are found, an increased sampling plan could be at a rate of 1% or 1/100 carcasses. This increased sampling would continue for 13 tests or 3 days of production, which ever is longer.
- ◆ Request that FSIS permit an 180 day pilot test of the system. This pilot would be conducted under a written program which would specify the frequency of carcass, locations which would be sampled on the carcass, and what corrective actions would be taken in the event of a positive carcass.
- ◆ Would support that establishments testing combos could designate the amount of product the sample represents – normally a sub-lot of combo bins. A lot tested must be defined prior to testing by the testing establishment.
- ◆ If an establishment samples incoming raw material, that sample must represent only the lot in question, and not require a total product recall.

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