

January 17, 2000

FSIS Docket Clerk
Docket #98-027R
Room 102 – Cotton Annex
300-12th Street SW
Washington, DC 20250-3700

(10)

~~RECEIVED
FSIS DOCKET ROOM
00 JAN 19 AM 12:07~~ RECEIVED
FSIS DOCKET ROOM
00 JAN 18 AM 12:03

98-027R-10
98-027R
Ray Millers

RE: Proposed Additional Regulation of Advanced Meat Recovery (AMR) Systems.

The most important aspect of this continuing controversy is, lingering face saving. The supporters of this unwarranted additional legislation have cast so many shadows on this subject that is now buried in the mire of innuendo.

FSIS has repeatedly stated, meat produced by Advanced Meat Recovery Systems is not a public health concern nor a food safety problem. If it isn't, then what is the problem?

FSIS's original rule 9CFR 301.22 (rr) subparagraph 2 is a sound well thought out simple rule that is effective, easily understood and applied, FSIS should be supportive of it's own rule.

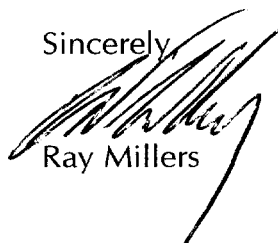
The problem is, the promoters of this new additional regulation are unhappy. They will continue to protest regardless of science. Protest is their basis for existing i.e., fund raising. In simple terms "professional protestors".

They have continued to muddy the issue with their innuendo. Their implication that AMR deboned meat is a consumer finished good product, is patently false; in reality, it is utilized as a lean amendment to other less lean meat. The mix ratio is generally 10 to 15% in ground beef. This could result in added iron per pound of meat of less than 1mg per a typical 4-oz. serving of ground beef.

Another problem is; how much iron exists in ground beef or any other ground product? Is the ground beef made from fed steers or spent cows and bulls, is it whole muscle or trim adjacent to the bone – and from which bones, or could it be a mixture of all the foregoing? What are the current iron standards for any type of meat, be it whole muscle or ground? How would sausage be addressed or pizza toppings and taco meat, or canned meats?

FSIS has allowed themselves to be lobbied into a corner. The only solution is, withdraw all proposals and defend the original rule. Should they continue to forge ahead with this additional regulation, they will probably find themselves in a defenseless position i.e., political accommodation as opposed to food safety.

Sincerely,



Ray Millers