



JOHN MORRELL & CO.

19

January 17, 2000

FSIS Docket Clerk, Docket #98-0278
Food Safety and Inspection Service, USDA
Room 102, Cotton Annex
300 12th Street SW
Washington, DC 20250-3700

98-027R-19
98-027R
Myron Johnson

SUBJECT: ADVANCED MEAT RECOVER SYSTEM PROPOSED RULE (DOCKET #98-072P, RE-OPENED COMMENT PERIOD)

Dear Sirs:

John Morrell & Co. currently uses an advanced meat recovery system at our larger pork slaughter facility. This system has been in operation for about two years and has had a significant impact for our labor force and our business.

We feel that this system has ergonomic advantages because hand trimming is not necessary when removing meat from the bones. This product is of very good quality and has been readily accepted in the wide spectrum of meat products it has been used in.

The method used for iron analysis in meats should be addressed before any proposed ruling is even discussed. The Agricultural Research Service has shown a wide range in data when comparing wet acid digestion versus the dry ash method which may be preferred. Once there is a science-based method for iron analysis, the next step would be to get a current database. This data should include variables such as the muscle source within a carcass and the age of the animal.

We feel there should be considerable research done before a ruling with such a significant ergonomic and economic impact is again proposed.

Sincerely Yours,

Myron Johnson
Manager of Technical Services

MI/cs