



**Prairieland Processors, Inc.**

512 West Goff Industrial Park Road • Arkansas City, Kansas 67005  
316-442-6464

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FSIS INSPECTOR ROOM 1  
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January 13, 2000

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

98-027R-20  
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James E. Hamlin

RE: Proposed Rule Advanced Meat Recovery

Dear Sir/Madam:

We are a small packer and have utilized an Advanced Meat Recovery (AMR) system in our operation for nearly four years.

The loss of use of this piece of equipment would harm our business. We are in a labor short area and would have to find new workers to reinitiate our whizzard deboning line. This in turn would probably increase the potential Repetitive Motion Traumas for our workers. We would most definitely have to expend several thousands of dollars to reconfigure our deboning area.

We have never had a food safety issue with meat produced by our AMR system nor have we ever heard of a food safety issue other than in Ms. Linda Golodner's comments. She is with the National Consumers League and in the past has mailed boycott threatening letters to our customers. This hurt us financially for a period of time.

In 1997 Mr. Billy wrote in a letter the following: "It is our belief, based on all of the currently available science, that meat derived from AMR systems is safe and wholesome".

In my opinion somebody is stirring up the consumer activists, the consumer activists are always looking for an issue, and food safety is as good as any. Should these consumer activists not have an issue, they will not receive contributions.

The American Meat Institute initiated and published Advanced Meat Recovery Good Manufacturing Practices for beef and pork products. We have already employed them at the direction of our manufacturer, BFD Corporation, when our system was installed.





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We continuously test for calcium, per the regulation, and have discovered calcium remains a near constant except for an occasional spike, regardless of pressure. We have also discovered that if we operate the systems at very low pressures-the calcium remains nearly the same - but our yields drop approximately 26-27%. We would expect the same results would apply to iron.

The April 13, 1998 proposed rule's language regarding adulteration was an insult to the industry. We have never considered our products other than safe and wholesome, our families and our worker's families consume our products.

We strongly recommend that FSIS reconsider their actions and withdraw the current proposals and maintain the current regulation.

Sincerely,

*James E Hamlin*  
James E. Hamlin

