



One Meating Place P. O. Box 269 Elizabethtown, PA 17022
Phone: (717) 367-1168 Fax: (717) 367-9096
E-mail: aamp@aamp.com Website: www.aamp.com

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January 13, 2000

Docket Clerk
Docket 97-027P
Room 102 Cotton Annex
300 12th Street SW
Washington, DC 20250-3700

98-027R-21
98-027R
Bernard F. Shire

RE: Proposed Rulemaking on Meat Produced by Advanced Meat/Bone Separation Machinery and Recovery Systems – Re-opening of Comment Period.

The **American Association of Meat Processors (AAMP)** is pleased to submit the following comments during the recently re-opened comment period concerning the April 13, 1998, FSIS Proposed Rulemaking on Meat Produced by Advanced Meat/Bone Separation Machinery and Recovery Systems that clarifies the regulations for deriving meat using AMR systems.

AAMP is a international trade association representing meat and poultry processors and slaughterers, wholesalers and retailers, caterers, home food service companies, custom operators and suppliers/consultants to the meat and poultry industry. AAMP's members are located in all 50 states, Canada and in foreign countries.

FSIS has re-opened this issue because **Agriculture Research Service** scientists, using a new way to measure iron, found much higher iron results than in the original FSIS survey. At the same time, an ad hoc committee representing the meat industry has found that food safety is not an issue, worker safety has been increased by AMR, and that there would be dire economic consequences if AMR could no longer be used.

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We support comments made by **Dr. Lester Crawford** of the **Center for Food and Nutrition Policy** at **Georgetown University**, Washington, DC, that AMR does not pose a food safety hazard. AMR is a very sophisticated technology that is a great improvement over former manual and mechanized deboning procedures. It's more efficient, and the product is less likely to contain abnormal tissue than meat produced by earlier systems. AMR technology actually helps employee safety by reducing the amount of repetitive motion disorder (RMD), as well as the number of bruises and cuts that meat plant employees experience.

AMR technology also results in a greater amount of high quality meat than meat recovered from previous systems or automated knives.

Two years ago, the **American Meat Science Association (AMSA)**, an organization with whom AAMP closely works, conducted a scientific review of two questions about AMR raised by a "consumer" activist group. The questions dealt with the nutritional composition of product made by the system, as well as the presence of spinal cord and other central nervous system tissue in AMR products.

Nutritional concerns were expressed about the presence of calcium and iron. The iron comes from red marrow. But studies conducted by the **National Academy of Sciences** show that many Americans have an iron deficiency in their diets, and actually need more iron, not less.

There is a significantly higher level of calcium in AMR product when compared to hand-boned meat. But again, calcium is deficient in many diets. Increasing occurrences of osteoporosis among women are tied to this lack of dietary calcium. The scientists stated that increased iron and calcium are a benefit to consumers. And that a slightly increased level of cholesterol from marrow is nutritionally insignificant for most consumers, because only five to 10 percent of AMR product is added to hand-boned meat.

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USDA should not change its position that meat products produced by AMR systems are safe and wholesome. The Department carefully regulates the composition of the product.

In the end, the public will decide whether it wants to purchase meat manufactured from advanced meat recovery systems. AMR is really an issue to be decided by the free marketplace. But the issue shouldn't be confused by efforts to raise unwarranted food safety concerns. The nutritional issues that were outlined in the original 1994 AMR regulation were favorable to the process, not opposed to it. And none of the issues raised in the 1998 regulation debate should stand in the way of this process being used to produce meat in industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Bernard F. Shire". The signature is fluid and cursive, with a large initial "B" and "S".

Bernard F. Shire, Director
Legislative & Regulatory Affairs

cc: Randy A. Alewel, AAMP President