



GROCERY MANUFACTURERS OF AMERICA
MAKERS OF THE WORLD'S FAVORITE BRANDS OF
FOOD, BEVERAGES, AND CONSUMER PRODUCTS

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March 8, 1999

FSIS Docket Clerk
Docket #99-003N
Room 102 Cotton Annex
300 12th Street, S.W.
Washington, DC 20250-3700

99-003N
99-003N-2
Stacy Zowel

Date 3/9/99
1:30 pm

Re: Notice of Public Meeting on Listeria Monocytogenes

Dear Sir or Madam:

The Grocery Manufacturers of America (GMA or the Association) welcomes this opportunity to provide written comments on the issues discussed at the Food Safety and Inspection Service's (FSIS or the agency) recent public meeting concerning Listeria monocytogenes (LM), held February 10, 1999 in Arlington, Virginia. GMA is the world's largest association of food, beverage and consumer product companies. With U.S. sales of more than \$450 billion, GMA members employ more than 2.5 million workers in all 50 states. The organization applies legal, scientific and political expertise from its member companies to vital food, nutrition and public policy issues affecting the industry. Led by a board of 44 Chief Executive Officers, GMA speaks for food and consumer product manufacturers at the state, federal and international levels on legislative and regulatory issues. The association also leads efforts to increase productivity, efficiency and growth in the food, beverage and consumer products industry.

GMA shares the agency's concern with regard to the safety hazards presented by LM in the nation's food supply. GMA continues to believe that LM, like all food safety hazards, can only be successfully addressed through comprehensive farm-to-table controls that are based on sound science and thorough risk assessment techniques.

With that guiding principle in mind, GMA has the following comments with respect to the specific issues raised by FSIS at its recent public meeting:

1. Sampling Ready-to-Eat Products Provides Little Food Safety Benefit

GMA does not believe that LM, or any other foodborne pathogen, can be effectively controlled through end product sampling and analysis. Rather, the Association urges the agency to focus its resources on the development, in cooperation with industry and consumers, of improved methods of processing and handling to control the incidence of LM in food products in the first instance. If, despite its limited utility, FSIS nevertheless believes some end product testing is warranted, such testing should exclude those products that simply cannot support the growth of LM. These include, among others, shelf-stable products, frozen and acidified foods, and those foods with low water activity.

2. Assessment of the Public Health Implications of *Listeria Monocytogenes* Requires Collection of Quantitative Information

A full understanding of the public health implications of LM requires a thorough risk assessment based on quantitative information. In that regard, every effort should be made to gather the data necessary to determine the infectious dose of LM. This information, and the other data necessary to establish meaningful, quantitative standards, is critical to the establishment of a successful LM food safety program.

3. Maintaining the Value of Sell-By and Pull-By Dates

GMA continues to believe sell and pull-by dates provide important and useful information to retailers and consumers. It is important to keep in mind, however, that the value of the dates depends in large part on proper refrigeration at retail. Improper refrigeration renders sell and pull-by dates meaningless for meat and poultry products. GMA, therefore, encourages the agency to work with retailers and state health departments to ensure proper refrigeration conditions.

4. Industry's Role in Reducing the Incidence of *Listeria*

Primary responsibility for the safety of meat and poultry products rests, of course, with the companies that produce them. GMA, therefore, urges all of its member companies to incorporate steps in their HACCP and Sanitation SOPs to reduce or eliminate the incidence of LM. The Association functions as an information resource for members implementing these controls. Other trade associations serving the food industry provide the same or similar support.

In addition to these current industry activities, GMA is hopeful that continuing research and experimentation in the field of packaging technology will produce workable methods of in-package pasteurization that significantly reduce the incidence of LM in packaged products.

5. Additional Educational Initiatives are Needed

An effective national food safety program must address the risks presented at all stages of the food chain from "farm-to-table." Thus, consumers, as well as producers and processors, have an obligation to handle and prepare food products in a safe manner. Additional work is needed, however, to ensure that consumers have the tools they need to discharge their food safety obligations.

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Specifically, consideration should be given to including basic methods of food handling, hygiene, cooking and food storage in school curricula. Youth organizations such as Boy Scouts and Girl Scouts could be encouraged to provide this type of education to their members. To reach adults, a program to urge physicians to educate their patients might help raise awareness.

GMA believes physicians can play a particularly important role in educating those individuals in vulnerable population groups. These individuals need accurate information about proper methods of food handling, preparation, storage and kitchen hygiene more than anyone else, and every effort should be made to encourage physicians to provide it to them in the context of a supportive, personal relationship.

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GMA looks forward to working cooperatively with the agency to address the risks posed by LM in the production of meat and poultry products. Please contact me if I can provide any additional information on this important public health matter.

Sincerely,

A handwritten signature in cursive script that reads "Stacey C. Zavel". The signature is written in black ink and is positioned above the printed name and title.

Stacey Zavel
Vice President, Scientific & Regulatory
Policy