

HENNINGSEN

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April 9, 2003

FSIS DOCKET ROOM
Docket 00-011N
USDA-FSIS
Room 102 Cotton Annex
300 12th Street
Washington DC 20250-3700

00-011N
00-011N-2
John Toneyt

Comments of Henningsen Foods Inc. on the notice of FSIS
Procedures for Notification of New Technology

DOCKET #00-011N

This notice is of interest of Henningsen Foods Inc. (herein after "Henningsen") because it is a manufacturer of dehydrated meat, poultry and egg products. To operate manufacturing plants at top efficiency and/or enhance product quality and safety, there are occasions when new processes and technology must be commercially evaluated.

Henningsen agrees with the Agency's need to review new processes and technology intended for use in official establishments with respect to product safety, FSIS regulations, inspection procedures and personnel safety. Henningsen also agrees that procedures should be designed to minimize the time required for the Agency to review new processes and technology and to employ uniform acceptance criteria.

Henningsen believes, however, that "new technology" requiring Agency review must be more clearly defined. This is particularly important for inspection program personnel (IIC's) who very often do not have the educational or experiential background to independently make a determination that the process or technology is new.

In addition, manufactures of meat, poultry and egg products, like Henningsen, need to clearly understand the scope of the new processes and technology that must be submitted for review.

FSIS defines "new technology" as new or new applications of equipment, substances, methods, processes or procedures. In this context, it is unclear whether "new" means new to a particular manufacturing plant or to the industry. Does it mean that the new technology is unproven or untested in any commercial setting? What about a process that is currently in use, having been previously reviewed and Agency approved, that is modified by the manufacturer to enhance operational efficiency? Henningsen believes that modifications of procedures currently in use that do not materially change the process, alter the critical control points (CCP's) (such as heat treatment or pasteurization parameters) or effect the quality, safety, composition or properties of the finished product should not require Agency review.

Therefore, Henningsen asks that the Procedures for Notification of New Technology clearly and concisely define "new technology" and the extent to which modifications of existing processes must be submitted for review.

Henningsen further believes that 60 calendar days to review a new process or technology is unreasonable and excessive – especially if this precedes a pre-use review, the time for which is not specified.

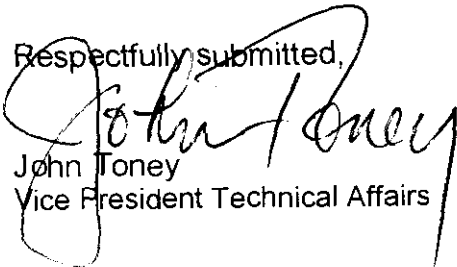
In the private sector, time is money. FSIS should act as a cooperative partner (rather than "Food Cops") in the efficient and safe production of meat, poultry and egg products by expeditiously reviewing "new technology". Henningsen believe that the initial review of "new technology" should be completed within 20 working days.

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Henningsen appreciates the opportunity to comment on this notice. The Company would be happy to address any request from the Agency for additional information pertaining to the issues discussed above.

Respectfully submitted,

A handwritten signature in black ink that reads "John Toney". The signature is written in a cursive style with a large, looping initial "J".

John Toney
Vice President Technical Affairs

JT:aw