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September 13, 2000

Docket Clerk
Food Safety and Inspection Service
U. S. Department of Agriculture
Room 112, Cotton Annex Building
300 12th Street, SW
Washington, DC 20250-3700

Re: Docket No. 00-27N -- Availability of Materials on In-Distribution Activities and Initiatives

The American Meat Institute (AMI) is the national trade association representing the meat and poultry slaughtering and processing industry. AMI members produce the majority of meat and poultry products sold in the United States and have a direct interest in the regulatory process that the Food Safety and Inspection Service (FSIS or the agency) has initiated through the above-referenced notice. Because the agency's initiative is a concept our comments must also be conceptual. We look forward to commenting on a specific proposal in the future.

Generally, AMI supports regulatory initiatives and actions enhancing the safety and integrity of meat and poultry products. The concept outlined in the notice provides FSIS an excellent opportunity to broaden its leadership in the "farm to table" (FTT) food safety continuum well beyond that implied by the above-referenced notice, and effect much needed improvements. "In-distribution" is a term broadly understood to apply only to a limited portion of the FTT continuum, *i.e.*, activities associated with product shipment, storage, and sale. Therefore, we believe that the agency must clearly define and describe all the segments applicable to the FTT concept and establish the roles and responsibilities of the participants along the continuum.

There are several things that should be captured under a broadened FTT concept. First, the term "in-distribution" should be dropped in favor of terminology representing the full FTT continuum, *i.e.*, activities beginning with animal production and ending with product consumption. Second, the duties and responsibilities of the entire FSIS "in-distribution" workforce, now and in whatever numbers it expands to in the future, should be broadened to cover the FTT continuum. In order to proceed with the much needed FTT activities we envision formal Agreements and Memoranda of Understanding with appropriate state and federal agencies. In addition, those agreements should include clear explanations of regulatory jurisdiction. Third, to best utilize the human resources from the participating agencies, joint efforts among all interested and affected parties should be launched to set goals and objectives, identify and prioritize those FTT activities having the greatest potential of improving food safety, develop communication channels, and establish reporting mechanisms and reports that enhance attainment of the goals and objectives. Additionally, research should be funded to focus on science based, peer reviewed programs covering all segments of the continuum. For example, if

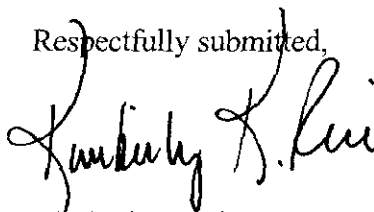
reducing or eliminating the use of illegal veterinary drugs in cull cows is a goal, then devoting the necessary resources to identifying violators and initiating appropriate enforcement actions would be very useful.

More specific to the above-captioned "in-distribution" notice, AMI does not support initiatives that would hold an establishment's HACCP plans accountable for problems caused after a product is out of the official establishment's control. Because of the nature of our country's storage, transportation, distribution and product handling systems, one segment of a long and complex food chain simply does not have the authority or the ability to control other segments. Establishments currently operating successfully under the FSIS Pathogen Reduction/HACCP rule are often held responsible for product that has been temperature abused, physically contaminated or delayed during transportation by other segments of the FTT continuum over which they have no control. Therefore, such things as microbiological testing of product in distribution channels after leaving the official establishment is not an indicator of the conditions under which the product was prepared, is improper, and serves no useful food safety purpose.

AMI believes that problems occurring during storage, distribution, and retailing of meat and poultry products, *e.g.* temperature abuse, pest problems, or insanitary storage conditions, should be dealt with using existing federal and state authorities, and any enforcement actions should be targeted to the offending entity (trucking firms, cold store, retailer, *etc.*).

AMI appreciates the opportunity to submit these comments and looks forward to further discussion with the agency.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kimberly K. Rice". The signature is written in a cursive, flowing style.

Kimberly K. Rice