



**North American  
Meat Processors Association**

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FSIS Docket Room  
Docket #00-031N  
Room 102 Cotton Annex Building  
300 12<sup>th</sup> Street SW  
Washington, DC 20250-3700

00-031N  
00-031N-1  
Deven L. Scott

RE: Comments to Docket #00-31N with respect to the National Conference on Animal Production Food Safety

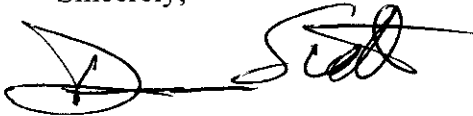
The North American Meat Processors Association (NAMP), a non-profit trade association representing meat and poultry processors is pleased that the Food Safety and Inspection Service (FSIS) in conjunction with other USDA and FDA agencies is taking steps to address the food safety dangers posed to humans by various food producing animals. Substantive progress in this area has been too long in coming. For the most part food safety efforts have been focused upon the regulated industries and have sidestepped opportunities to address on farm production. Though there are a number of human diseases that may occur from a variety of livestock and poultry animals the most deadly food safety problem and one that most seriously affects our membership continues to occur from product associated with cattle.

*E.coli 0157:H7* has been a scourge to the industry for some eight years. Children, the elderly, and the immune compromised have paid a high price for the reluctance of some to voluntarily address conditions or causes that may reduce or eliminate growth or introduction of this deadly pathogen in the live animal. Too many producers continue to support a disconnect between their animals and the food supply. Furthermore, their research efforts have largely been devoted to offering research funds to address areas other than those that might directly impact on farm management practices. FSIS and APHIS have had their hands tied due to lack of regulatory authority since FSIS's authority starts at the slaughter-house door, and APHIS may only cover diseases that affect animals, not human beings. If we are producing animals for consumption and food safety is the true goal, this disconnect must be changed. Consequently the burden for eliminating the *E.coli 0157:H7* pathogen has become the problem of the slaughter and processing industries who have no part in the introduction of the pathogen into the animal. This has been a particularly onerous burden for downstream grinders since FSIS policy is to test for the pathogen only at the grinder or retail level and to hold the grinder responsible when the adulterant is discovered. Needless to say numerous small and large companies have been victimized by this policy when in fact the problem is caused by the failure of upstream producers to contain the pathogen. Producers of livestock must consider on-farm Good Manufacturing Practices (GMP), experiments to inoculate their animals, and efforts to monitor overall farm practices to help reduce or eliminate pathogenic organism as best they possibly can.

The National Conference is designed to open the dialogue between producers and the various regulatory agencies. Topics will cover research initiatives, residue programs, educational efforts, and gaps in research efforts. Although these are important needs, we hope that a sense of urgency is given to discover and break new ground in putting substantive farm management protocols into practice. What is needed is not more talk about research or its gaps, or about educating others, but concrete action plans to make positive steps to contain *E.coli 0157:H7* and other farm related pathogen by experimenting and applying the knowledge we already have. It is long past the time to discover and implement significant steps in the prevention of pathogens at the earliest possible point versus trying to detect them after they have entered the processing and distribution stage.

We recognize that if public concern about meat safety continues to erode, there will be a considerably smaller market for the animals raised in this country. Time is running short. Delay plays into the hands of the animal welfare, vegetarian, and health activist groups. While Nero fiddles, Rome burns. We hope this Conference will grab the bull by the horns and not be just another show and tell.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deven L. Scott', written over a horizontal line.

Deven L. Scott  
Executive Vice President