



**North American
Meat Processors Association**

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FSIS Docket Clerk, Docket No. 00-34N
USDA, Food Safety and Inspection Service
Room 102 Cotton Annex Building
300 12th Street, SW
Washington, DC 20250-3700

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Martin W. Holmes

In Triplicate

December 1, 2000

RE: Docket No. 00-34N Conceptual Framework for Residue Control in an HACCP Environment

The North American Meat Processors Association (NAMP) requests that FSIS consider the following concerns in making its determination on how to incorporate Residue Control within the HACCP framework. NAMP members are further processors and distributors of meat and poultry products which they receive directly from slaughters or in redistribution from slaughterers. NAMP member companies are highly supportive of the HACCP concept, and welcome ideas which would guarantee the elimination of illegal chemical residues from the food supply. In applying HACCP we have recognized the need to put steps in place both in receiving and record keeping procedures which assure that the meat and poultry products purchased have undergone intervention steps at slaughter which provide the maximum assurance possible that pathogens, such as E.coli 0157:H7, have been minimized or eliminated. Some members have already incorporated the use of irradiation pasteurization as an additional tool. In accepting our responsibility under the HACCP discipline, however, we continue to point out the unfairness of the E.coli 0157:H7 adulteration policy which seeks to control the problem with end product testing at the grinder-processor or in-distribution level rather than prevention at the source, namely the farm or slaughterer level. It is indisputable that E.coli 0157:H7 arrives in or on the live animal. Downstream users such as NAMP members have no control on the means to eliminate or mitigate its entry into the food processing system. This will also be true with respect to illegal chemical residues.

The Conceptual Framework purports to address the problem on a farm to table basis and perhaps to include under its Residue Control efforts as noted in Issue No. 4 Sampling scheme adequate for prevention, sampling at the processor level. Further FSIS suggests it will continue to verify; affirm or deny residue levels, as appropriate with respect to foreign country export or U.S. import requirements. Though we accept and understand the latter need, we are inalterably opposed to any requirement that would subject a processor such as a NAMP member or end user to a failure under its HACCP plan or for financial liability or adverse publicity for a discovery of an illegal chemical residue beyond the farm or slaughterer level. To do otherwise would penalize, as presently does the E.coli 0157:H7 policy, parties who could not ever have been at fault in the introduction of the illegal residue. It would foreshadow a further step towards concentration in the meat and poultry industries.

FSIS must put in place a system by which illegal chemical residues and the meat or poultry animals in which they are found, are eliminated from the food supply either on the farm or at the very latest at the slaughter house. Wherever found the economic loss for those animals must be borne by the producer or those parties in the producer chain found responsible. Obviously, to effect such accountability there needs to be an adequate trace back system. Such trace back could be implemented through simple affidavits passed along the producer chain to the slaughter house attesting to whom the livestock or poultry moved and that in the individual handling and delivery by those parties that no illegal substance was used. If subsequently it was found that the affidavit(s) were false, there would be a clear trace back trail.

In presenting our concerns about the illegal residue program we have alluded to our continuing problem with the way FSIS addresses E.coli 0157:H7 testing. It is our hope that in establishing testing and verification protocols for illegal residues that the agency will also incorporate measures that can minimize or prevent this pathogen from moving from the farm or slaughterhouse into the stream of commerce. It is long past the time when such action should be taken. Voluntary efforts by the livestock industry to attack the problem on the farm have been minimal. Consumer groups as well as further processors of ground beef have supported more aggressive action by the agency. It is time to move forward. Whatever changes in the law, or in cooperative understandings with other food safety agencies necessary to address illegal chemical residues can certainly be applied to the E.coli 0157:H7 situation as well. To not do so when the residue situation is under consideration would be to lose a golden opportunity.

We look forward to the discussions and proposals on addressing illegal chemical residues. We hope you will seriously consider the processing industry needs as you address the issues. NAMP stands ready to be helpful in your efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin W. Holmes" followed by a stylized flourish.

Martin W. Holmes

cc: Board of Directors