



**NATIONAL CATTLEMEN'S BEEF ASSOCIATION**

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December 19, 2000

FSIS Docket Room  
Docket No. 00-047N  
Room 102 Cotton Annex Building  
300 12th Street, SW.  
Washington, DC 20250-3700

**Re: [Docket No. 00-047N]; The Next Steps, *Federal Register*. December 6, 2000, Volume 65, Number 235, Page 76210.**

Dear Ms. Moore:

The National Cattlemen's Beef Association (NCBA) respectfully submits these comments in response to the Food Safety and Inspection Service's (FSIS) public meeting December 13, 2000. The meeting was held to discuss the Agency's plans to continue to improve the quality and effectiveness of its programs and to work with establishments in the meat and poultry industry to improve their performance under the Pathogen Reduction/Hazard Analysis and Critical Control Point (HACCP) regulations.

Producer-directed and consumer-focused, NCBA is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry.

The document states, "since the HACCP-based regulatory approach has now been implemented in meat and poultry establishments of all sizes, it is time to plan for these improvements." NCBA looks forward to continued participation in formulating a multi-year strategy for such program improvements.

HACCP's (Hazard Analysis and Critical Control Points) continued evolution should embrace the concept of continuous improvement, with government and industry working together to achieve mutually established goals that work to protect public safety.

It is important for the government to allow the industry sufficient independence, so that the dramatic progress that has been made by industry thus far can continue. It is of equal importance that FSIS maintain a central role in monitoring and surveillance, especially in the areas of antimicrobial residues and "non-food safety" issues, or other consumer protection activities, such as economic adulteration or misbranding.

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Government must maintain a strong continued presence in collection, monitoring and surveillance for antimicrobials, using risk-based determinations. These determinations must be made using risk-assessments that have been conducted based on sound science. A risk assessment based on less runs the dangerous risk of either greatly under or over-estimating risk. NCBA encourages FSIS to invest whatever funds and time necessary to conduct realistic risk-assessments for all food-safety matters.

NCBA believes that antimicrobials provide the beef industry an avenue to produce safe and wholesome meat products for the consuming public. Beef producers understand and accept their responsibility in protecting the health of both humans and animals. It is possible to achieve minimal risk through cooperative efforts beginning on the farm and concluding in the hands of the consumer. A farm-to-table approach to food safety should begin with sound farm-management and continue through processing, distribution, retail, and consumer handling. FSIS monitoring and surveillance at slaughter is an important element in this process.

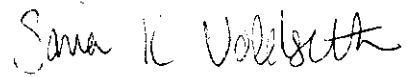
Past measures and actions taken on the issue of drug residues can help determine the best role for FSIS to assume in the future. FSIS should also utilize the information gathered by Codex for monitoring and verification activities, domestic and internationally. In the determination of how FSIS will address residues it will be extremely important to make sure a fair measure exists between antimicrobial residues and a “hazard reasonably likely to occur”, critical control points, and responses to those points. Even as antimicrobial residues are not a “hazard reasonably likely to occur”, FSIS must maintain a central role in monitoring and surveillance.

On March 17, 2000, in its Advanced Notice of Proposed Rulemaking (ANPR) on Other Consumer Protection (OCP) Activities, FSIS defined OCP activities to include verification and enforcement activities that are directed to achieving objectives that do not necessarily, or primarily, involve food safety. FSIS conducts many activities to identify and prevent product that is unwholesome or unfit for human food, but does not present a food safety concern, from entering commerce. It is imperative that FSIS continue these activities to prevent any embellished or misrepresented products from leaving the plant.

Consumer protection concerns other than food safety are important to consumers, and the public expects the Agency to provide a broad range of consumer protections. FSIS should make sure existing resources for monitoring and surveillance are utilized and if additional resources are needed to act accordingly.

NCBA looks forward to a continued cooperative relationship between government and industry on these important issues. We appreciate the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Sonia K. Voldseth". The signature is written in a cursive, flowing style.

Sonia K. Voldseth  
Associate Director, Food Policy

Cc: Tom Billy