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**~ Important Dates ~**

**46th  
Management Conference**  
March 21-23, 2003  
The Drake Hotel  
Chicago, IL

**61st  
Annual Convention**  
October 23-26, 2002  
The Phoenician Resort  
Scottsdale, AZ



**North American  
Meat Processors Association**

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April 30, 2003  
In Triplicate

FSIS Docket Room  
Docket No. 01-040N  
U.S. Department of Agriculture  
Room 112 Cotton Annex  
300 12<sup>th</sup> Street, SW  
Washington, DC 20250-3700

01-040N  
01-040N-1  
Martin W. Holmes

Comments Re: Notice and request for comments on the Availability of *Salmonella* Test Results

The North American Meat Processors Association (NAMP), a non-profit trade association of establishments serving the foodservice and retail industries with fresh and ready-to-eat meat and poultry products actively supports and is greatly encouraged by the progress being made by all members of the food production chain in lowering the incidence of food borne illnesses. This all-out industry effort to enhance consumer safety has shown substantial success as evidenced by the latest data released by both the Centers for Disease Control and USDA. It is critical, moreover, that we continue to improve our efforts, and this Announcement and Notice help pave the way towards that goal. Accordingly, in support of the goal we wish to offer the following suggestions with respect to the implementation of the proposal.

We approve in essence basic suggestions by both the Center of Science in the Public Interest (CSPI) and by the National Advisory Committee on Microbiological Criteria for Foods (NACMCF) with respect to the more timely release and publication of *Salmonella* test results. We assume that both the release and publication will include meat, poultry, and egg producing establishments. Obviously, *Salmonella* is not limited to these products alone, and though the HACCP Rule and agency oversight does not necessarily extend to them, we should not forget that *Salmonella* is associated with many products even those not under FSIS jurisdiction. Methods to improve control over *Salmonella* and other pathogens must encompass efforts in all arenas from farm to table. Mere reporting and announcements focusing on ground products by themselves will not provide the cure that is implicit in this goal.

We do not believe the publication of the numerical values of the tests will serve a practical purpose for consumers. Raw numbers may confuse and alarm the public which is not conversant with scientific analyzes and cause concern and fright about the safety of the food supply when in fact the raw numbers may be within acceptable ranges and appropriate to the baselines of different products, the time of year, and other appropriate parameters. In our judgment the proper release of test results to the public should only be indicated on a passed or failed basis. Actual numerical values should only be disclosed to the tested establishments who in the administration of their HACCP plans can make valuable use of the data to improve their operating procedures. We support the disclosures of the names and locations of the passing and failing establishments, but caution against an extension of the disclosure to include the names and locations of the distribution

outlets the products may have reached. To do otherwise could create uneasiness and concern in consumers who may never have been affected by contaminated product from a failed lot, but who may have been a customer of a named outlet.

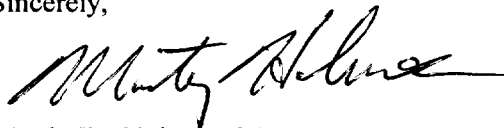
We agree that the proposal will not have a deleterious effect on export trade, but remind the agency of their obligation to assure that foreign establishments shipping affected products to the United States are subject to these new disclosure requirements. We also agree that the disclosures, both in individual and sample set results, will be helpful in enabling domestic producers to evaluate and improve their oversight and containment programs. The release of individual *Salmonella* test results will allow establishments to attack and resolve problems immediately rather than later. Quicker responses can only promote an improved public health.

We also agree that the publications of individual test results by the methods proposed by FSIS are the most appropriate and meaningful way to do so. The underlying purpose of this proposal is to reduce and if possible eliminate *Salmonella* contaminated product from reaching consumers, not to provide a broadcast venue. Consumers may, if they so desire, request individual results, but more importantly will be their ability to view the sample set results on the FSIS website. This information will allow them to evaluate processors based on pass-fail criteria. The establishments will have an incentive to correct individual test problems so that their sample sets meet the *Salmonella* reduction standards. To do otherwise would be foolhardy since their livelihoods depend on continued consumer acceptance of their products.

An additional *Salmonella* reduction step would be to make changes in allowable processes or in the Standards of Identity for ground beef so as to allow interventions during the grinding process to mitigate pathogens, if in fact the interventions need be considered additives not processes. Requests of this nature have been under review for some time, and it would be appropriate to finalize their use in conjunction with the implementation of this proposal.

NAMP appreciates your consideration of our views, and looks forward to continuing to work with you to provide improvements in procedures and the acceptance of new science-based initiatives that will provide a safer and improved food safety system. Please feel free to call on us at any time that we may be helpful in these efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin W. Holmes". The signature is fluid and cursive, with the first name "Martin" being the most prominent.

Martin W. Holmes, CAE  
Executive Vice President

cc: Board of Directors