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March 13, 2003

FSIS Docket Room
Docket #00-011N

Comments on FSIS Notice:

FSIS Procedures for Notification of New Technology

U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102, Cotton Annex Building
300 12th Street, SW
Washington, DC 20250-3700

03-005N
03-005N-13
Ed Ting

Re: FSIS Procedures for Notification of New Technology

We applaud the intent of USDA and FSIS to consider and approve effective, science-based new technologies that can improve the safety of our food supply.

While it is "new" compared to other processing choices available to United States food plants, Avure's high-pressure processing technology has been in widening acceptance over the past several years. Academic research and commercial applications alike have confirmed its effectiveness and safety in operation. Our high-pressure processing systems are utilized in ready-to-eat meat and poultry establishments.

In response to the Draft FSIS Listeria Risk Assessment model, the statement submitted jointly by the American Meat Institute (AMI), the National Chicken Council (NCC), The National Food Processors Association (NFPA), and the National Turkey Federation (NTF) made the following statement, which acknowledges the effectiveness of high-pressure processing:

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“The 90-95% efficiency for interventions **such as high pressure processing** and post-packaging heat treatments are also low. These processes are designed to kill levels of *L. monocytogenes* that would arise from environmental contamination. If the organism is not there, there is no risk. The model should reflect close to 100% effectiveness for this parameter.” (Copied from *Re: Docket No. 03-005N; Draft FSIS Risk Assessment for Listeria in Ready-to-eat Meat and Poultry Products*; dated March 3, 2003; Joint Statement Issued by the American Meat Institute, National Chicken Council, National Food Processors Association, and the National Turkey Federation) (The bold emphasis on the phrase “such as high-pressure processing” was added for the purpose of this letter response by Avure Technologies.)

Because Avure’s high-pressure processing technology is so well established, we contend that it should not be subjected to a requirement for plant-by-plant trials. Rather, we will submit comprehensive supporting documentation, to demonstrate that FSIS and USDA can accept this technology for ready-to-eat meats and poultry products.

Based on that compelling information, we respectfully request that FSIS accept Avure’s high-pressure processing as a safe, effective post-lethality, post-packaging treatment process, when utilized as a critical control step in a plant’s HACCP program.

We further request that FSIS acknowledge that those ready-to-eat meat and poultry establishments which utilize high-pressure processing under those conditions may be classified as eligible for the “targeted verification testing program” or “low-targeted verification testing program” according to their decision to share test data as defined in FSIS Directive 10,240.3 dated 12/9/2002: MICROBIAL SAMPLING OF READY-TO-EAT (RTE) PRODUCTS FOR THE FSIS VERIFICATION TESTING PROGRAM.

We look forward to working with FSIS representatives on this important issue.

Sincerely,

Dr. Ed Ting, Ph.D.
Chief Research Officer