



March 14, 2003

FSIS Docket Clerk
Docket No. 03-005N
Room 102, Cotton Annex
300 12th Street, SW
Washington, DC 20250-3700
Fax No. 202-690-0486

03-005N
03-005N-8
Kevin O. Gillies

**[Docket No. 03-005N] *Listeria* Risk Assessment Technical Meeting;
68 *Federal Register* 6109; February 6, 2003**

Dear Ms. Riley:

Rhodia Inc. is a global food ingredients supplier with a long history in developing technologies for enhancement of food safety beginning with our market leadership position in starter cultures for the fermented dairy and meat product industries through our ground-breaking petition to FSIS to allow on-line reprocessing of poultry carcasses in combination with safe and suitable anti-microbial agents such as trisodium phosphate (TSP) to control *Salmonella* and *E. coli*.

In keeping with Rhodia's commitment to food safety, we support science-based policy making and we would like to congratulate FSIS and FDA on the development of the *Listeria* Risk Assessment Model that was presented at the February 26, 2003 meeting. We can all agree that this risk assessment is a valuable beginning of what should be an ongoing process to improve and utilize the model to guide policy decisions. We also appreciate the opportunity to participate in the improvement process by commenting on aspects of the ***Draft FSIS Risk Assessment for Listeria in Ready-to-eat Meat and Poultry Products***; February 26, 2003.

Specifically, we address our comments to the model component which assesses the impact of post-processing technologies on *Listeria monocytogenes* (LM) occurrence and subsequent risk. Model iterations presented in Table 14 of the *Draft FSIS Risk Assessment* predict dramatic improvement in terms of lives saved when a combination of post-processing LM reduction/bacteriocidal technologies (PP) in combination with growth inhibitory/bacteriostatic technologies (GIP) are employed on RTE deli meats. In fact, we believe the projections under-estimate the potential impact of post-processing technologies on risk reduction.



As pointed out in the meeting of February 26, PP impact was modeled based on assumed efficiencies of 95% or 99% reduction of LM, however, 99% reduction does not accurately reflect the state of the art in terms of post-processing LM reduction available to food processors today. We will not comment on physical process (heat, pressure, etc.) efficiencies, but will speak to the efficiency of ingredient technologies that reduce LM in the product vs. those designated as GIP/formula modifications which only maintain the number of LM at given levels.

As a demonstration of the possible, Rhodia herein submits data (see Attachment A) which indicates that a 3 – 4 log reduction of LM can be obtained on high risk RTE deli meats using affordable, GRAS post-processing ingredient technologies. Based on this data, we request that FSIS use a value of 99.9 % reduction as an upper end target reduction in an iteration of the model. We are confident that this model iteration will show that using such technologies can yield significant improvements in predicted risk reduction. Likewise, we will not be surprised if the benefit is greater than that shown for the iteration of the model utilizing the combination of PP95% + GIP.

We note, also, that to achieve the reduction of risk related to LM in deli meats predicted in the model iterations with PP and/or GIP, 100% of the industry is assumed to use the PP alone or in combination with GIP technologies. Because of this need for broad application of the technologies in order to effectively reduce risk, Rhodia strongly urges that FSIS, in employing the risk assessment model outputs to guide policy and rule making, act to ensure that the HACCP plans of all high risk RTE meat and poultry product producers include the use of appropriate post-processing technologies at levels that are scientifically demonstrated to achieve at least a 70% risk reduction.

The substantial risk reduction in terms of illness and death that are predicted from widespread adoption of post processing listericidal technologies can be quantified using this model and, as employment of these technologies are predicted to yield considerable public health benefit, Rhodia urges FSIS to move the process forward rapidly from Risk Assessment to Risk Management in the form of the final rule on RTE meat and poultry, and corresponding directives and guidelines for implementation.

Thank you for the opportunity to comment on this important draft risk assessment.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin O. Gillies", is written over the typed name and title.

Kevin O. Gillies
Director, Regulatory Affairs -- NA
Rhodia Food
KOG/jn 03-014

ATTACHMENT A

Figure 1.



Day 1 Initial Kill of *L. monocytogenes* 3 ATCC strain cocktail:
Comparison of solution concentration vs Effectiveness on ham
surface treatment (contains nitrite) Stored at 4°C.
Started 5/8/02

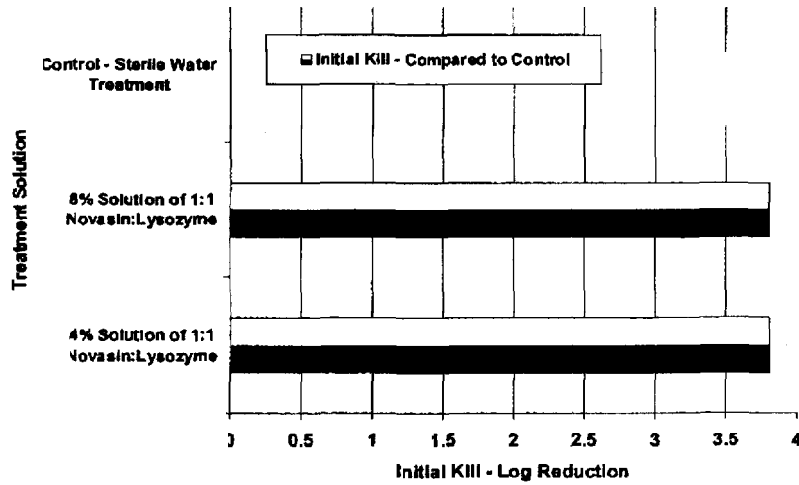


Figure 2.



Comparison of Solution Concentration on *L. monocytogenes* (3 ATCC strains) using surface
treatment of ham (contains nitrite) Temp abused 20 hours at 20°C, then stored at 4°C
Started 9/29/02

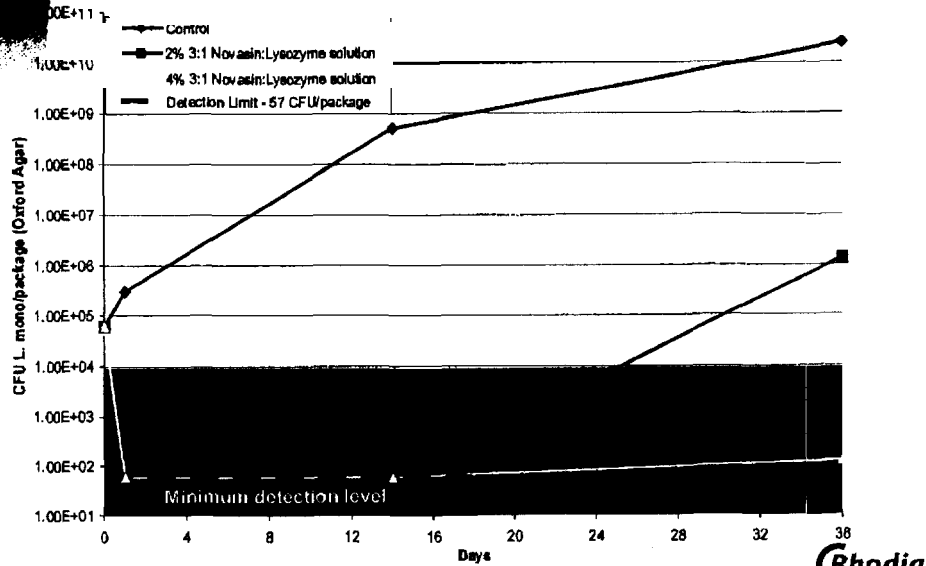


Figure 3.

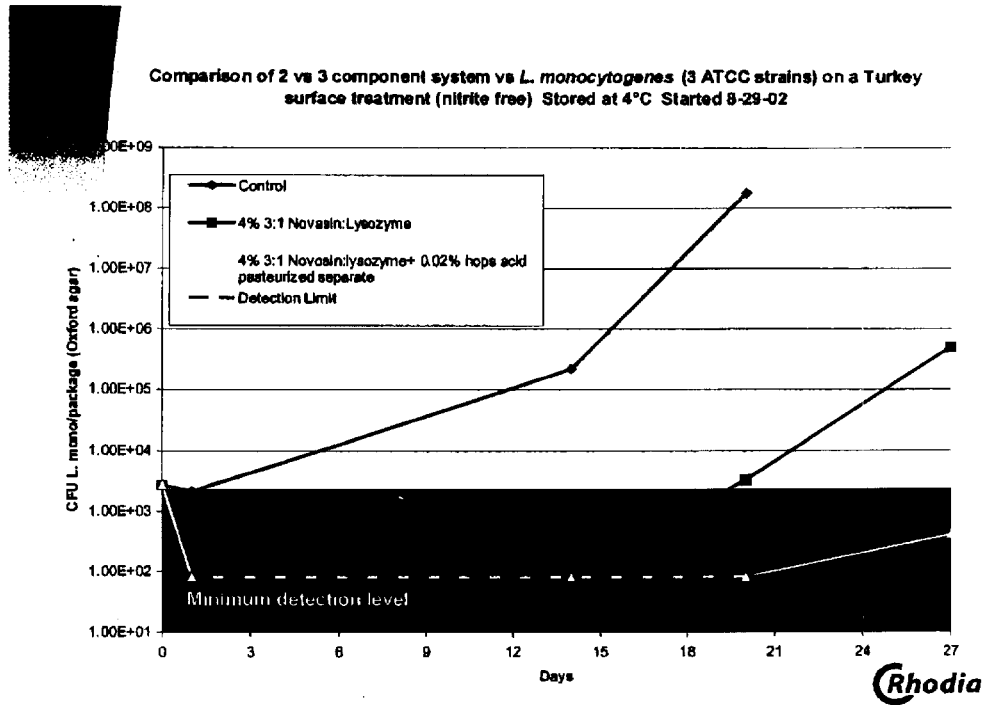


Figure 4.

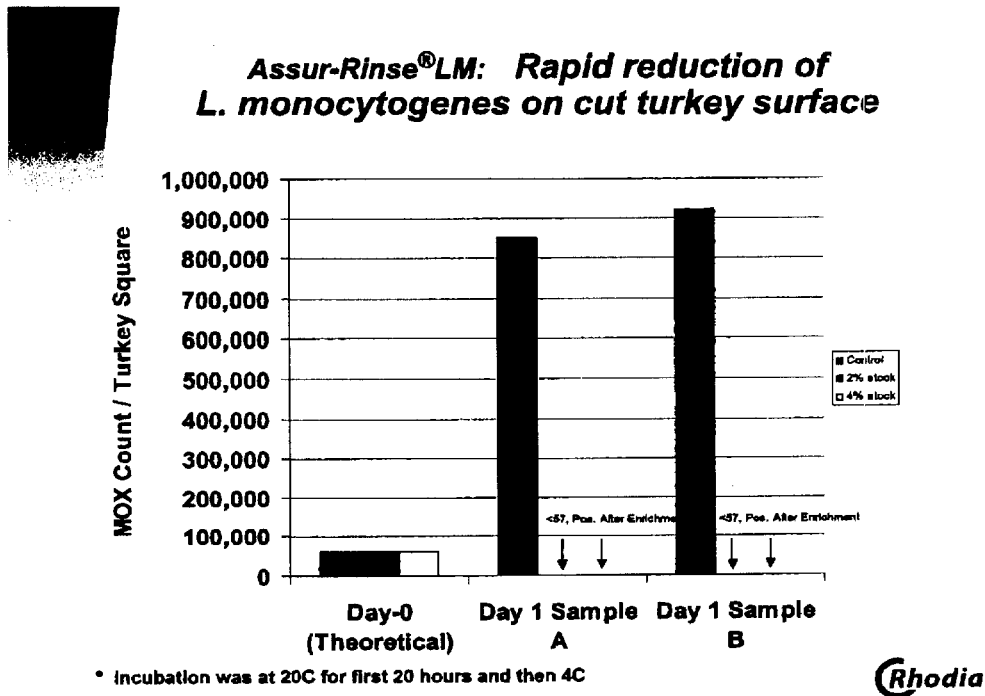
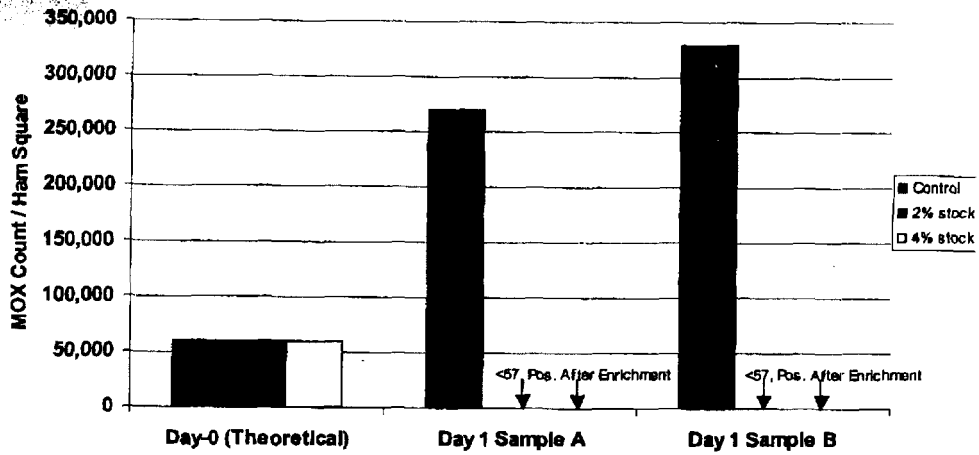


Figure 5.

Assur-Rinse[®]LM: Rapid reduction of *L. monocytogenes* on cut ham surface



* Incubation was at 20C for first 20 hours and then 4C

