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FSIS Docket Clerk
Docket 03-031N
Room 102
Cotton Annex
Washington, D.C. 20250-3700

03-031N
03-031N-1
Joseph A. Miller



RE: Pre-Harvest Food Safety Issues and *E. coli* O157:H7

The North American Meat Processors Association (NAMP) is a non-profit trade association whose members process and distribute meat, poultry, game and seafood to the foodservice industry. We therefore welcome this opportunity to comment on the Pre-Harvest Food Safety Issues involved and to participate in this Food Safety and Inspection Service's (FSIS) public meeting to explore both the issues and the opportunities available to maximize food safety from the beginning of the farm-to-table continuum.

Our membership comprises a major segment of those who perform the grinding process and subsequent distribution of ground beef products to the hotel, restaurant, and institutional marketplace. Consequently we, and other ground beef processors, are directly affected by the pre-harvest activities of livestock producers who are the first step in the supply chain that provides the vital raw materials used to produce our products. NAMP for many years has suggested the need to monitor pre-harvest conditions, but has been stymied by the vacuum caused by the lack of regulatory authority or the assumption that the science was inadequate to do so. By now addressing the *E. coli* O157:H7 issue from its very inception in the cattle population, as well as at the slaughter and processing levels, we will close the loop on a serious public health problem that requires absolute cooperation and compliance by all segments of industry.

NAMP members take great pride in the production of their products. We actively support FSIS's mission to provide consumers with a safe meat and food supply. No one benefits when consumers buy or are concerned about unsafe food. This has again been dramatically brought to our attention by the recent BSE scares in Japan and Canada, as well as the latest *E. coli* O157:H7 product recalls here in the States. Not only have these problems created public apprehension and a public health threat, but in addition they have caused severe economic damage both to the companies and individuals involved, and to the credibility of industry and government alike.

NAMP proposes a two pronged approach to this problem. First, we suggest that FSIS, and USDA, develop and institute, with all sectors of the industry being involved, best management practices for on-farm control of foodborne pathogens. Secondly, if it proves necessary to implement the above, that FSIS, as well as APHIS and Homeland Security in the interest of food safety propose changes in authority within USDA either by regulation or by Congressional action that would allow regulatory oversight of on-farm activities.

Often the concern is raised that there aren't any proven methods to eliminate food borne pathogens, specifically *E. coli* O157:H7, at the farm level and therefore it would be premature to insist that certain practices be accepted and enforced by the Agency. Similarly the same situation has existed at the slaughterer and processor levels, yet FSIS has instituted numerous regulations and guidelines to help minimize the existence of such pathogens. These regulations and guidelines, including such programs as HACCP, were enthusiastically implemented by the meat processing industry in an effort to do everything they could possibly do to ensure a safe food supply. As a result USDA statistics show that this effort is paying off in less reported illnesses and fewer people exhibiting health problems due to food borne pathogens. The addition of pre-harvest requirements will add a strong additional weapon to the arsenal of food safety tools and open the door to the introduction of vaccines, trace back procedures, and other means to control or eliminate the passage of pathogens from animal to human beings. .

Producers have argued that, among other things, that they do not want government inspectors on the farm. Whether or not that position is reasonable in the light of the possibilities of terrorism and in the interests of food safety is debatable, however, the oversight need not be inspection, but rather oversight fulfilled by veterinarians or other qualified animal health experts either on-farm, in the stockyard, or in other pre-slaughter arenas . An added advantage of the system would be to bring animal health experts to countless numbers of producers who may never have seen a veterinarian.

As for being held responsible for a problem, in spite of all of the steps they may have taken to ensure that pathogen contamination did not occur, NAMP members face that possibility every day they are in operation. This in spite of the fact that the company had done everything possible to prevent it. In the event of a recall the establishment finds itself at economic risk, yet, the producer loses nothing, and in fact has no accountability whatsoever. This situation makes very little sense. If the goal is to have a safe food supply then the problem must be addressed from the beginning to the end of the process. Not starting in the middle as is presently done.

FSIS currently lists a variety of management practices on its website that have shown to help reduce the incidence of *E. coli* O157:H7 and *Salmonella*. These range from housing practices to feed and water sources, antibiotic use and a variety of other pre-slaughter treatments that could be used at the present time on the farm to reduce these pathogens. While research may be needed to develop and implement other actions that could reduce the incidence of these pathogens even further there is little reason to not begin to require the application of known procedures to help the situation at the present time.

NAMP applauds FSIS for taking this step towards development of on-farm procedures to reduce *E. coli* O157:H7 and other food pathogens. In summary, we encourage FSIS to move rapidly in applying what is already known in the area of pre-harvest improvements. Further, we encourage FSIS to continue to research other possible methods to reduce food

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pathogens at the farm level, and we also encourage FSIS to form a working group with other USDA agencies, as well as the Food and Drug Administration and Homeland Security, in developing a uniform set of procedures and guidelines that can be implemented on the farm to make our food supply even safer than it is today.

Sincerely,

A handwritten signature in cursive script that reads "Joseph A. Miller".

Joseph A. Miller
Executive Vice-President

cc: Board of Directors