

Meat Produced by Advance Meat/Bone Separation Machinery and Meat Recovery Systems

The California Department of Food and Agriculture (CDFA) has the following concerns about the use of Advanced Meat Recovery (AMR) Systems on bovine carcasses:

1. **Risk:** The 1998 Harvard study identified AMR as the most important process in which “low-risk tissue” such as muscle are contamination by “high risk tissues” including spinal cord, brain, and dorsal root ganglia.
2. **Compliance:** The presence of spinal cord and dorsal root ganglia in AMR products is a persistent problem. We are concerned that complete exclusion of neural tissue from AMR cannot be achieved with current techniques.
3. **Product Testing:** If the proposed AMR rule is approved, FSIS must establish sensitive validated tests that would assure that product contaminated with neural tissue would be readily detected and prevented from entering commerce.
4. **Determination of Cattle Age:** FSIS must establish methods to assure that the head and spinal column from cattle over 30 months is excluded from the AMR process. If this cannot be assured, the head and spinal column from all cattle should be banned from AMR.
5. **Disposal of Contaminated Product:** AMR product derived from cattle over thirty months of age and contaminated with neural tissue should not be permitted to enter edible rendering. Rendering does not destroy the prion protein; allowing this method of use of contaminated product does not protect the consumer. Contaminated AMR product derived from cattle over thirty months of age should only be permitted to enter the inedible rendering process.
6. **Product Recall:** Currently, FSIS issues a voluntary recall of product if spinal cord is detected in the sample. Based on scientific risk of human exposure to BSE agent in AMR, a mandatory recall of contaminated product is warranted.

Based on these concerns, CDFA proposes AMR not be permitted on any bovine carcass, whole or part, if FSIS cannot ensure the product is free of neuronal tissue.