



Premium Standard Farms®

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FSIS Docket Clerk
Docket #03-0381F
Room 102, Cotton Annex
300 12th and C Street, SW
Washington, DC 20250-3700

Dear Sir/Madam,

This letter is in response to the interim final rule published by the Food Safety and Inspection Service (FSIS or the agency) on January 8, 2004, requesting public comment about the rule pertaining to Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems.

Premium Standard Farms operates two processing plants with a slaughter capacity of four million head annually. We have used Advanced Meat Recovery systems for many years, and estimate the value to be about \$2,000,000 per year.

We are opposed to the inclusion of pork from AMR systems in a rule designed to control risk materials from beef and to minimize exposure to SRM. In the summary, FSIS states, *"This new regulation is a prophylactic measure designed, in part, to prevent human exposure to the Bovine Spongiform Encephalopathy (BSE) agent by ensuring that AMR systems are not a means of introducing central nervous system tissue not product labeled as "meat".*

There is no basis for including pork from a scientific perspective because no case of naturally occurring Transmissible Spongiform Encephalopathy has ever been demonstrated in swine (NPB, 2004). In addition, there appears to be no basis for removing this to meet consumer expectations because DRG may already be present in hand deboned or bone-in products. We believe that implementation of the rule as proposed will have the effect of halting production of this valuable protein raw material costing our company, and the pork industry, a large amount of revenue and job loss.

The rule is very clearly designed to address the concern of BSE in beef raw materials, which is a valid concern, but the inclusion of pork raw material into this rule minimizes its risk-based orientation.

In keeping with the current definition of meat, spinal cord is removed during the slaughter process and its absence confirmed prior to back or neck bones entering the AMR system. The inclusion of brain, trigeminal ganglia and dorsal root ganglia (DRG) are not relevant for pork:

1. CNS is not a human-based risk factor for pork.
2. There is not testing methodology to support this requirement.
3. It is possible for DRG/CNS to be present in hand deboned product or associated with bone-in products such as chops/steaks, and so a risk-based exclusion from AMR is not relevant.

For these reasons, we specifically request the exclusion of pork from 318.24c(v).

We appreciate the opportunity to comment on this rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Collette Schultz Kaster". The signature is written in a cursive style with a large initial "C".

Collette Schultz Kaster

V.P. Food Safety and Technical Services