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Sent: Thursday, August 03, 2006 10:39 AM
To: FSIS RegulationsComments
Cc: Palesano, Bobby; Kelly, Karlease; McKee, Garry
Subject: COMMENTS ON DOCKET NUMBER FSIS-2006-0017

I am pleased to submit suggestions for consideration at the Technical Service Center, especially in reference to FSIS Outreach to Small and Very Small Plants.

1. Dr. Richard Raymond has suggested that when problems arise at plants, that the IIC and a plant representative place a joint conference call to the TSC and cooperatively work towards a resolution. I fully endorse this idea. However, the eventual conclusion should be documented somehow and be made part of the formal record to eliminate the need for subsequently reinventing this same wheel at numerous other plants. I am suggesting that after the conference call is terminated, that TSC personnel type a summary of the conclusions made by all parties to the call, and email the summary to both (a) the IIC, and (b) the plant representative, both of whom would have the opportunity to respond. These review/edit process would eliminate confusion and misinterpretation of conclusions. If an ammended report is necessary, the same TSC personnel should create such a report and again email it to the IIC and plant personnel. Once no further ammendments are necessary, a copy of the final agreement can be filed by the TSC, the IIC, and plant management.

2. Refer back to # 1 above. When the final agreement has been accomplished, the TSC should post the agreement conclusions on its Web Site, allowing the entire industry to have access to the information. Many issues brought before the agency, including the TSC, are redundant. Multiple recurring similar requests unnecessarily demand time and resources from agency personnel to answer duplicate requests which had previously been answered. Historically, many of these redundant requests have been provided answers which have contradicted answers provided by other FSIS personnel, creating confusion which could have been averted.

3. The website should be segregated into dozens (perhaps hundreds) of categories into which these answers can be filed for expedited future access by agency personnel as well as industry representatives. Examples of categories would include:

A. Slaughter: Validation studies for use of Lactic Acid
 Frequency of monitoring carcasses for Zero Tolerance
 Generic HACCP plans for Sheep Slaughter
 How to utilize Statistical Process Control (SPC) when reviewing lab results of swab testing carcasses for generic

E.coli

B. Chill Cooler: Scientific Papers justifying establishment of Temperatures allowable under HACCP plans.
 Space separation between carcasses in chill cooler: does FSIS have minimum standards?

C. Processing Room: Scientific Papers to justify establishment of appropriate temperature minimums for HACCP plan design.

Lot Designation: how to establish the number of lots for each production shift
 Pre Shipment Review (PSR) considerations prior to shipment of ground beef into commerce

D. HACCP Plan Hazard Analyses: 1. Slaughter: (a) Must BSE be considered? If so, at which step?
 (b) Can Zero Tolerance be a CCP?
 (c) Must small plants implement a chemical spray intervention step?

2. Processing, Raw Ground: (a) Must hand soap be considered a potential hazard?
 (b) If spices are considered a potential hazard, what kinds of

control measures are

considered acceptable?

E. Validation Methods Acceptable to Agency: (1) Slaughter decisions

- (2) RTE
- (3) Raw, Not Ground

Bottom Line: whenever the TSC or SIPO provide technical answers to the industry, these agency answers must be posted on a user-friendly web site for access by all parties. Admittedly, these answers then establish national standards (safe harbors) which all plants can safely use with tacit agency endorsement. The advantage of consistent national standards are numerous, and the need for such standardization has become obvious since HACCP's advent.

Respectfully submitted by:

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