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April 15, 2004
FSIS Docket 97-013F
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102 Cotton Annex,
100 12th Street, SW.
Washington, DC 20250-3700

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Rebecca Kurylo

Docket 0583- AC46 Control of *Listeria monocytogenes* in Ready-To-Eat Meat
and Poultry Products 09 CFR 430 June 06, 2003

Dear Madam or Sir,

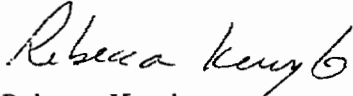
The Interim Final Rule relies heavily on HACCP and Sanitation SOPs to govern the environmental testing requirements of the proposed standard. The provision for validation of controls included in a HACCP plan just states existing requirements of 9 CFR 417.4. Similarly, the requirement that Sanitation SOPs be evaluated routinely to ensure their effectiveness restates the requirements in 9 CFR 416.14.

As you well know, an effective environmental sampling program can identify potential contamination and prevent recurrence. In addition to the requirements of the HACCP and Sanitation SOPs reiterated in this proposed rule, long term trend analysis is a key component of preventing future contamination. Under 9 CFR 416.16- Sanitation SOP records are only maintained for six months and under 9 CFR 417.4- HACCP the requirement to keep records vary from 1 year to 2 years. No specific record keeping time frame is established in this proposed rule. My comment would be to use this opportunity to clarify an effective environmental sampling program that includes long term trend analysis.

Please consider the following in the Final Rule:

1. Inclusion of long-term trend analysis in environmental sampling

Sincerely,


Rebecca Kurylo