



**Gourmet Beef Jerky**

Rt. 1, Box 87-C, Bokoshe, Oklahoma 74930

(918) 969-2600 • 1-800-969-2604

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April 25, 2001

FSIS Docket No. 97-013P  
U. S. Department of Agriculture  
Food Safety and Inspection Service  
Room 102, Cotton Annex  
30012 St., SW  
Washington, DC 20250-3700

97-013P-14  
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Charlotte Isaac

Re: Federal Register Docket 97-013P  
Subject: Federally Proposed Requirements for Ready-To-Eat Meat Products

To whom it may concern:

As a small plant owner I would like to address the seriousness of this proposal and the impact it would have on my processing plant.

First, a small background on listeria monocytogenes, the major topic of this proposal. Listeria has been around since the 1920's. It is only recently that it has been found to be present in food production i.e., processing plants. The biggest problem with this proposal is the inference that listeria is found ONLY in processing plants. This is not true. Listeria is an air born pathogen, and can be found in soil, dust, and water, and on the down side, animal intestines and sewage. Listeria is not particular about where it lives. The only way it can be controlled is through sanitation and temperatures low or high enough to minimize its ability to be harmful.

The USDA would like to make the meat processors the sole bearers of the bad tidings that this pathogen is in our food. That may be, but it's also everywhere else. With technology sliding off the scale, new pathogens and new bacteria are being isolated on a daily basis. With this in mind, plans have been implemented to insure the consumer that their foods are safe to eat. HACCP is one of them. The problem with HACCP or any other pathogen reduction program is that it's only as good as the HACCP team that implements it. Sanitation is high on the agenda with HACCP. So are time and temperature controls. Surface testing for listeria would be next to impossible simply because of listeria's invasive nature. A surface could be tested 24 hours a day, sanitized continually, and listeria would still work itself into the system. The key to control is minimizing. Pathogen Reduction: Hazard Analysis Critical Control Point (HACCP) was implemented for that purpose. I say that's good enough and my reasons are as follows:

1. Surface testing either in-house or by an outside lab would be of little value. Every time a door was opened, an air conditioner turned on, a delivery made; the pristine conditions of the plant would be quarantined. Retesting would be required. This is ludicrous. Not only would the price to any processor, large or small, be exorbitant, the process itself would be so consumptive that it would intervene with other operations.
2. The price of this testing would have to be passed through the system somewhere. That would be to the consumer. With BSE and Foot and Mouth Disease knocking at our door and prices already at their limits, will the consumer be willing to absorb even more Big Brother excessiveness from the government on the premise that its for their own safety? I think not.
3. The small processors will fall like a house of cards under the rulings of this new proposal. We cannot afford to implement an in-house testing program. With the small processors gone, the large processors will also lose. Without us to sell to, they will have to concentrate more and more on sales to wholesale grocers and other establishments that aren't even under federal jurisdiction. What will happen when the USDA discovers, too late, that we are not the only ones who are guilty of letting pathogens slip through the system and on to the consumer? Will they then implement HACCP and other pathogen reduction requirements to state health department inspected facilities? Again, I think not.

In short, this is a lose/lose proposition. Not only will it NOT work, it will destroy the meat industry. I'm all for food safety but this is not the answer. Consumer education, pathogen reduction requirements at lower levels, i.e. the neighborhood grocer, fast food restaurants, etc. is the direction we must now take. The packers and processors cannot take the entire blunt of responsibility and expense for this program. I think we've done enough. For the most part, we are diligent, hard working, compliant individuals that want the system to work for everyone. But, please, all we ask is don't regulate us out of business.

Sincerely,

Charlotte Isaac  
Owner/Partner