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John Heuer

September 20, 2001

FSIS Docket Clerk
Food Safety and Inspection Service
United States Department of Agriculture
Room 102 Cotton Annex Building
300 12th Street SW
Washington D.C. 202250-3700

RE: FSIS Docket No. 97-013P: ***Performance Standards for the Production of Processed Meat and Poultry Products***

To Whom It May Concern:

I am writing this letter on behalf of Redi-Serve Foods, Establishment 1300, in response to a request for comments regarding the proposal mentioned above.

Our specific comments are outlined below. However, it should be stated up front that in general, we oppose the rule. As written, the proposal adds significant operational and financial burden to the food industry without supplying any real evidence of benefit to public health. It is our opinion that FSIS should withdraw this proposal.

A. General

The proposal summary states "...there are no specific regulatory pathogen reduction requirements for most of these products." We strongly disagree. We are a heavily regulated industry with performance standards for lethality and stabilization currently in place.

B. Lethality

We find it both confusing and troublesome that the proposal goes on at LENTGH about statistical probabilities for reducing levels of **Salmonella** in worst case scenarios, then, it briefly states "...the establishment must also reduce other pathogens... to levels necessary to prevent product adulteration." If the absence of pathogens is the standard, great, we have met that standard for years. Write the standard to read exactly that way. Allow establishments to operate with validated HACCP plans that are routinely verified to produce pathogen free products. Then, if establishments fail their verification steps, they would, as outlined in Part 417, be required to go through corrective action steps including HACCP reassessment.

Our factory, like many others, has produced RTE meat patties for years without pathogen contamination. The proposal states "...FSIS determined that a higher lethality was likely necessary..." Why? On what basis does FSIS believe we need to process our products differently than we do now? We have years of data that suggest our current processing parameters are meeting the standard of no pathogens.

C. Stabilization

Our establishment is currently operating with a validated HACCP plan that allow us to produce products with <10 clostridia organisms per gram. Also, botulism has not been associated in any significant way with fully cooked, not shelf stable meat and poultry products. Why then, should we be held to a higher standard?

D. Listeria monocytogenes

Part 416 requires us to clean our plant in a manner which will prevent contamination and adulteration of our products. Also, Part 417 requires us to identify and address potential hazards. Therefore, if the standard is no Lm and we are currently operating with a validated HACCP plan and regularly verify the absence of Lm in our products, shouldn't the agency let us continue to operate and assume we are currently meeting their standard? It seems logical that only the establishments that can not verify Lm free products should be asked to conduct corrective action and HACCP/SSOP reassessment, not the ones that are currently meeting the standard.

Additional comments would be; what further reduction in Lm would this rule actually facilitate and shouldn't risk of grow out after processing somehow be incorporated in the rule?

E. Financial Impact

This rule would have a significant negative annual financial impact on our company in terms of yield and production loss because of over cooking product and due to a significant increase in expenses for holding production while waiting for Lm results.

In summary, we feel HACCP and SSOP programs have been adequate guidelines in assisting us in producing wholesome products, and we see absolutely no need for further restrictive regulations that would not significantly benefit public health.

Sincerely,

John Heuer
Director of Quality Assurance
Redi-Serve Foods