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## AGRICULTURAL TRADE SERVICES

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January 27, 1999

FSIS Docket Clerk  
Docket No. 97-068N  
U. S. Department of Agriculture  
Food Safety and Inspection Service  
Room 102 Cotton Annex  
300 12th Street, SW  
Washington, D C 20250-3700

Re: Beef Products Contaminated with Escherichia Coli 0157:H7

In Docket No. 97-068N the Agency has stated that it believes that with the exception of beef products that are intact cuts of muscle, an E. coli 0157:H7-contaminated beef product must not be distributed until it has been processed into a ready-to-eat product. The Agency defined a ready-to-eat food product as one that may be consumed safely without further cooking or other preparation.

This language differs from the broader language in the 1994 rule which governed raw ground beef. In that rule it stated that if a product was contaminated with E. coli 0157:H7 it would be considered adulterated unless it was further processed to destroy this pathogen.

In the last paragraph of this Docket the Agency notes that it is preparing a proposed rule on procedural and labeling requirements for irradiated products and that interested persons would have an opportunity to comment on irradiation treatment of E. coli 0157:H7-contaminated products as an option for effectively eliminating this one specific pathogen.

My comment is; will irradiated beef products be included under the *ready-to-eat category* or will the language in the proposed rule revert back to that in the 1994 rule that simply refers to *further processed to destroy this pathogen*.

A second comment is; assuming that the proposed rule for irradiated products will address a variety of food-borne pathogens, why would comments on contaminated products be limited to one specific pathogen, E. coli 0157:H7.

Respectfully submitted,

*Albert S. Marulli*  
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