



OSI INDUSTRIES, INC.

20

RECEIVED
FSIS DOCKET ROOM
99 MAR 22 AM 9:49

March 19, 1999

FSIS Docket Clerk
Docket #97-068N
USDA FSIS
Room 102
Cotton Annex
312 12th Street SW
Washington, DC 20250-3700

RE: FSIS Docket No. 97-068N Beef Products Contaminated with *E.coli* 0157:H7

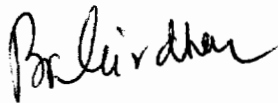
To Whom It May Concern:

This is in response to your policy on beef products contaminated with *E.coli* 0157:H7. The Agency's January 19, 1999 notice significantly expanded the scope of the FSIS policy governing beef products containing *E.coli* 1057:H7 which was originally implemented in 1994 and applicable only to raw ground beef. We, as a premier processor of raw ground beef products to the QSR industry in the US, would like to submit our comments to this policy change.

1. We recommend carcass swabbing along with multiple microbial interventions at the slaughter plants rather than end product testing. We believe this is a better way to detect and prevent *E.coli* 0157:H7. We believe carcass swabbing for the pathogen should be at the same sampling rate as is currently done for generic e.coli (i.e., in every 300 carcasses). Carcass testing combined with generic e.coli testing will serve as a validation of process controls and would require action upon the confirmation of a positive test result.
2. The six month exempt/non-exempt window should be removed because emphasis is on process control rather than accept/reject policy.

3. We need a clear definition on the lost size. We would suggest:
 - The carcass be a lot; and
 - A combo of trim be a lot
4. We recommend no finished product testing if it has been through an exempt chain.
5. FSIS should offer assistance to companies who want to participate but need assistance.
6. FSIS should support education for consumers, pre-harvest research and risk assessment.

Sincerely,



Dr. B.K. Girdhar
Vice President
Director of Research & Development
and Quality Assurance.