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THE NATIONAL ASSOCIATION OF  
STATE MEAT AND FOOD INSPECTION DIRECTORS

c/o Texas Department of Health  
Meat Safety Assurance Division  
1100 West 49th Street  
Austin, Texas 78756

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Telephone: (512) 719-0205 Ext. 472

Facsimile: (512) 719-0240

March 17, 1999

FSIS DOCKET CLERK DOCKET NO 97-068N  
U S DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
ROOM 102 COTTON ANNEX  
300 12<sup>TH</sup> STREET SW  
WASHINGTON DC 20250-3700

Dear Sir or Madam:

The National Association of State Meat and Food Inspection Directors (NASMFID) agree that *E. coli O157:H7* is a potentially deadly human pathogen, and food products containing the pathogen must be properly treated, to include adequate heat processing (cooking) to destroy the pathogen before consumption. We do agree that the organism could be introduced below the surface of meat products by processes such as injection, mechanical tenderization, and chopping, and if these products, when contaminated with *E. coli O157:H7*, are not cooked to an appropriate internal temperature before consumption, could result in food borne illness. We do not agree that *E. coli O157:H7* should be considered an adulterant on or in any raw meat or raw meat product, because this and other organisms are an inherent part of raw meat and poultry when produced employing current technology. This fact was recognized by Secretary Glickman in his news release announcing USDA plans to allow irradiation of meat. Mr. Glickman stated "Irradiation is currently the only known method to reduce or eliminate potentially dangerous microorganisms on meat and poultry." We would support increased consumer awareness programs regarding the importance of cooking such products thoroughly (at least medium-well where the juices run clear or preferably to an internal temperature of 160° F.) We would not oppose a requirement to label such products with a warning to the consumer to cook to at least medium-well doneness.

Sincerely,



Lee C. Jan, D.V.M.  
President