

OFFICE OF THE EXECUTIVE SECRETARIAT, USDA

1999 MAY 19 A 10:36

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May 14, 1999

Mr. Daniel R. Glickman
Secretary of Agriculture
400 Independence Avenue SW
Washington, DC 20250

DENNIS HECKER
Vice President, Quality Assurance

Dear Secretary Glickman:

Wendy's International fully supports the proposed FSIS policy declaring E. coli O157:H7 as an adulterant in non-intact beef products as well as the lotting protocol outlined in the FSIS Q&A/Current Thinking document dated February 26, 1999.

Wendy's is committed to providing the safest and highest quality ground beef to our customers and has worked very diligently over the years to employ strict, fully integrated quality control and food safety programs to reduce the risk of food borne illness. Our integrated approach to food safety starts with the most up-to-date pathogen reduction interventions such as steam vacuums, hot water/steam pasteurization at our raw material plants and continues all the way to our restaurants where extensive employee food safety training programs, mandatory glove usage, and handwashing procedures have been implemented.

A critical element of our overall pathogen risk reduction strategy for beef has been our trim combo lot testing procedure for E. coli O157:H7. This procedure, which has been in place since November 1994, has allowed us to test every combo of trim prior to manufacture and has been extremely successful in preventing E. coli O157:H7 contaminated combos of trim from being incorporated into our beef supply. Even though it can be argued that E. coli O157:H7 contamination may be a non-random event, it is our experience that when a positive lot is detected on any truckload, the contamination has been confined to that one lot and has not carried forward to the other lots on that same truckload.

We at Wendy's International believe that our trim combo lot testing program coupled with our other required pathogen reduction interventions offers us the best protection against E. coli O157:H7 and would strongly urge the FSIS to adopt a final policy that would allow lot testing of trim combos.

Sincerely,

WENDY'S INTERNATIONAL INC.

Dennis Hecker
Vice President of Quality Assurance



DH/pkm