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April 30, 1998

Docket Clerk  
Food Safety and Inspection Service  
U.S. Department of Agriculture  
Docket Room 102, Cotton Annex  
300 12<sup>th</sup> Street, SW  
Washington, DC 20250-3700

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RE: FSIS Docket No. 98-004N  
*Ground Beef Processing Guidance Material*

Dear Sir:

The Food Marketing Institute (FMI) is pleased to have an opportunity to comment on the Food Safety and Inspection Service (FSIS) Notice, *Ground Beef Processing Guidance Material*. FMI's recent experience participating with FSIS and others in the development of the *Fight BAC* consumer education campaign serves as an outstanding example of the benefits we all achieve, especially consumers, when we work together for a common goal. FMI, and many others segments of the farm-to-table continuum, are anxious to continue to enhance the partnership that led to the success of our joint education effort.

The Food Marketing Institute (FMI) is a nonprofit association conducting programs in research, education, industry relations and public affairs on behalf of its 1,500 members including their subsidiaries — food retailers and wholesalers and their customers in the United States and around the world. FMI's domestic member companies operate approximately 21,000 retail food stores with a combined annual sales volume of \$220 billion — more than half of all grocery store sales in the United States. FMI's retail membership is composed of large multi-store chains, small regional firms and independent supermarkets. Its international membership includes 200 members from 60 countries.

The retail industry is the direct link to the consumer, and providing the safest food possible is a primary goal of retailers. Retailers are a part of the community they serve, and for them, food safety is more than a business goal — it is a personal responsibility and commitment. The

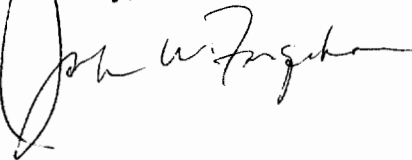
retail and wholesale industries support programs that will improve the safety of our food ultimately have responsibility for implementing them. The retail and wholesale industry commend FSIS for working with the ground beef processors to assure a safer meat supply.

Retailers are using a variety of methods to improve the safety of the meat they purchase to sell to their customers. Through FMI, the retailers are exploring ways to develop their own buyer specifications that will best suit their needs and their individual circumstances. Also, FMI members are embarking on a scientifically based program to develop and implement a total food safety management program at retail. Ground meat will be one of the highest priority areas for the total food safety management program.

Retailers continue to adjust and enhance their procedures to improve the safety of ground beef. The role of the retailer is to minimize cross-contamination and to prevent the further growth and multiplication of any pathogens that might be present in ready-to-cook ground beef. FMI has worked closely with its members to develop retail *Guidelines for Beef and Other Red Meat*. A copy of this information is enclosed (Attachment 1). As the retail industry continues to generate more scientific data on the best good manufacturing and handling practices for perishable products, we will update and modify our practices accordingly.

We support FSIS' activities to provide guidance to the ground beef processing industry, and encourage you to continue to work closely with that industry to improve the safety of our food supply. We have also enclosed comments (Attachment 2) on the guidance document that we hope will serve to improve the guidelines and provoke meaningful discussions on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Farquhar". The signature is written in a cursive style with a large, looped initial "J".

John W. Farquhar  
Group Vice President  
Scientific and Technical Services