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TELEPHONE: (202) 797-3319
FACSIMILE: (202) 797-3037
E-MAIL: Peter.Miller@dfat.gov.au

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OFFICE OF
THE VETERINARY COUNSELLOR
1601 MASSACHUSETTS AVE. NW
WASHINGTON DC 20036-2273



EMBASSY OF AUSTRALIA
WASHINGTON DC

IN REPLY QUOTE:

26 May, 1998

FSIS Docket Clerk
Food Safety and Inspection Service
Annex Building
300 - 12th St. SW Room 102
Washington D C 20250

**Comment on 98-004N "Guidance For Beef Grinders
To Better Protect Public Health"**

I am writing on behalf of the Australian Meat Council, the National Meat Association of Australia, the Australian Meat and Livestock Corporation and the Australian Quarantine and Inspection Service to provide comment on draft document 98-004N entitled "Guidance For Beef Grinders To Better Protect Public Health" published by the Food Safety and Inspection Service, published in the Federal Register on 20 March 1998.

It is noted that the guidance document is premised on three main points: grinders structuring their operations in a manner that takes into account safety; implementation of process and distribution controls that reduce public health concerns associated with ground beef contaminated with *E.coli 0157:H7*; and the maintenance of records for the identification and retrieval of any ground beef that may pose a threat to public health.

In recent years there has been a general consensus that the most effective method in commercial circumstances of minimising the risks with microbiological hazards of gastrointestinal origin in fresh meat is through the adoption and verification of HACCP procedures. The FSIS PR/HACCP rule with its components of standard sanitary operating procedures (SSOPs), microbiological verification of process control by generic *E. coli* testing, HACCP, and *Salmonella* standards is an expression of this approach.

It is also noted that in complying with the Rule, all countries exporting to the United States have embraced these components, either by replication of the requirements of the rule or by implementing equivalent sanitary measures, and that certification attesting that all relevant measures have been met is issued by competent authorities of countries exporting meat to the US.

In our view, the points on structuring operations, implementation of controls and implementation of retrieval mechanisms in the guidance document do provide a HACCP-consistent emphasis on controls to better protect public health. However, the specific reference to *E.coli 0157:H7* testing in the Guidance document cannot, we contend, be viewed as consistent with this objective.

The specific reference to *E.coli 0157:H7* testing is of concern because: there is no mention of other specific pathogens that could be of concern to public health eg other Enterohaemorrhagic *E.coli* or *Salmonella*; and it is likely to provide an indication to producers of grinding meat and consumers that validated HACCP systems do not provide the most effective method of minimising the risk in commercial circumstances from microbiological hazards of gastrointestinal origin. The guidelines recommend that testing for *E.coli 0157:H7* be undertaken in addition to, and not as part of, monitoring of grinding operations. As indicated on page 2 of the guidelines, the results of any

microbiological testing plan can only provide a limited assurance that this or indeed any other pathogen is not present. In this regard, absence of evidence could not be considered evidence of absence of pathogens.

There is also the question that guidelines do not indicate that sampling for *E. coli* 0157:H7 testing should be undertaken in any scientifically valid manner, and without that caveat, would not provide any additional safeguards or assurances to consumers and producers of grinding meat in regard to microbiological hazards of gastrointestinal origin, in particular *E. coli* 0157:H7. The statistical confidence of a negative test result under any sampling program would need to be defined and understood.

The alternative approach of employing process interventions capable of reducing *E. coli* 0157:H7 numbers in either raw meat and trimmings for grinding or the finished product has the potential to provide a greater degree of public health protection than the proposed testing scheme. Such process interventions should not be mandated by governments, but be subject to individual process line implementation by industry, as part of its on-going development of HACCP programs.

It has proven possible to reduce the end microbiological load for carcasses through certain additional process interventions. The effectiveness of trimming operations may be enhanced by steam vacuuming. Available process interventions include the use of steam, hot water and organic acid treatments. The successful operation of such process adjuncts can be readily verified. In the case of hot water treatments, the close monitoring of the operation of the treatment equipment and its appropriate maintenance can be used to ensure its effective operation. Additionally, some limited bacteriological testing using indicator organisms (for example Total Viable Counts) can be employed. Little or no benefit would be envisaged in utilising pathogen testing as a tool for verifying the satisfactory operation of this equipment. Similar principles apply to the monitoring and verification of steam and organic acid treatments on the slaughter floor.

In relation to finished ground product, a number of process interventions are potentially available. These could include product irradiation.

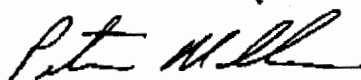
There is also a need to continue to educate end users that proper food hygiene measures including adequate cooking, are an essential part of ensuring the safety of the food supply. In this regard, proper cooking ensures destruction of pathogens of concern and is an effective means of meeting public health objectives.

In summary, modern meat inspection systems address the risk posed by microbiological contamination through the application of HACCP-based systems which serve to ensure these risks is minimised. The operation of HACCP systems on slaughter floors is verified through a process of generic *E. coli* testing and other objective measurement systems. Additional process interventions also included within the HACCP program will further reduce these risks. Requesting end product testing for *E. coli* 0157:H7 is of questionable scientific value and does not provide additional assurances for consumers or producers of ground meat.

Any imposition by US grinders of an *E. coli* 0157:H7 testing regime on overseas suppliers of frozen, boneless boxed manufacturing meat would pose additional logistic difficulties for exporting country packers. In part this arises from the fact that the ultimate fate of the product (ie for grinding or for manufacturing purposes involving validated lethality steps) is not necessarily known at the time of packing or shipping. Under this circumstance, unnecessary and costly testing would potentially need to be undertaken and would be most unlikely to significantly improve the safety of the finished ground product.

Therefore we seek that consideration be given to amending this "Guidance" document so as to remove reference to the need for *E. coli* 0157:H7 testing of meat and trimmings used in the manufacture of ground beef.

Yours sincerely



for RR Biddle
Assistant Director