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NATIONAL
MEAT CANNERS
ASSOCIATION

January 18, 2000

Docket Clerk
Food Safety and Inspection Service, USDA
Room 102, Cotton Annex Building
300 12th St., SW
Washington, DC 20250-3700

98-027R-17
98-027R
Bill F. Dennis

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03 JAN 19 PM 7:25

Re: Docket No. 98-027R, Meat produced by Advanced Meat/Bone Separation Systems
(63 FR 17959)

The National Meat Canners Association (NMCA) is the organization representing the interests of meat and poultry canners, their suppliers, and importers of canned meat and poultry products throughout North America (NA). NMCA's members produce the majority of canned meat and poultry products, and have an interest in this matter because meat produced by Advanced Meat Recovery Systems (AMRS) can be used in many canned products.

Based on newer research done by the Department's Agriculture Research Service and others, two inferences seem reasonable. First, iron is not as valid of a predictor of the quantity of certain bone constituents in meat from AMRS as older research data suggested. This seems to be due in part to the number of variables affecting the iron content. Second, analytical results for iron may be unreliable for stringent regulatory use such as the agency proposed. One reason this is true is because of the great difficulty maintaining the calibration of analytical instruments to coincide with the standard of reference. This one problem could result in the agency falsely concluding the lot of product that has been analyzed is out of compliance when, in fact, the lot was in compliance.

We have reviewed the letter submitted by the American Meat Institute (AMI), and believe the four main points are highly credible. Therefore, NMCA fully endorses the AMI letter. The agency's rulemaking on meat produced by AMRS is not about food safety, and based on the problems brought to the agency's attention concerning this matter, should drop the rulemaking in favor of issues of greater importance and concern to all interested parties.

Thank you for your consideration.

Sincerely,

Bill F. Dennis
Regulatory Advisor