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**Foodbrands
America**

Howard C. Madsen
Vice President, Procurement

January 17, 2000

FSIS Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102, Cotton Annex
300 12th Street, S.W.
Washington, DC 20250-3700
(202) 720-3333

98-027R-6
98-027R
Howard C. Madsen

RE: Docket No. 96-027R – Reopening of Comment Period for the Proposed Rule Published April 13, 1998; Meat Produced by Advanced Meat/Bone Separation Machinery and Recovery Systems

To Whom It May Concern:

As a member of the meat and poultry processing industries, Foodbrands America, Inc. appreciates the opportunity to comment on the above-captioned notice. Our previous comments filed on June 10, 1998 are still appropriate and accurate to the issue at hand. Foodbrands respectfully requests that those comments be referred to in addition to the following:

The key issues are:

1. If adopted, this rule will result in a major and significant economic impact to the industry and consumer. Comments made in 1998 by the AMI, and others, attested to this fact. The size and significance of the economic impact have been further substantiated in a study conducted by Sparks Companies, Inc. in 1999.
2. If adopted, this rule will have a significant, negative impact on the ergonomics of the workplace and the safety and welfare of the meat processing plant worker. The AMR rule of 1994 allowed the industry to adopt new technology that automated previous jobs that were identified as significant ergonomic stress-related jobs. If adopted, this rule will effectively result in the loss of this technology and equipment from use in the beef industry, and which for competitive economic reasons, may cause the re-introduction of these manual tasks back into some meat processing operations.
3. Flawed science was used to develop the underlying details for iron limits that were presented in the proposed rule. The field survey data collected and analyzed by FSIS in 1996 are seriously flawed. There were problems with sample collection and identification, laboratory analysis methodology for iron, interpretation of results, and the drawing of erroneous conclusions. There is an arbitrary and unsupported assignment of iron limits in the proposed rule. We urge the use of scientific methods for managing and advancing food safety issues as well as the regulation of food production systems in the U.S.A. These points are supported by work conducted by USDA ARS in a study completed in 1999

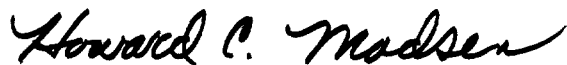
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4. **There is not a food safety issue.** This has been verified by FSIS in previous statements and public issuance and is further verified in a paper presented by Dr. Lester Crawford, Georgetown University Center for Food and Nutrition Policy.

Foodbrands recommends that the agency fully consider input from the AMI, as well as comments made by the industry-based AMR coalition. Points made in these comments regarding the need to re-evaluate the basic definition of meat are valid and merited, and Foodbrands challenges the agency to further consider reevaluation of this antiquated definition and requirement.

Thank you for your consideration of our views.

Respectfully
FOODBRANDS AMERICA, INC.



Howard C. Madsen
Vice President Procurement

HCM/vmr