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January 14, 1999

F.S.I.S. Docket Clerk
Docket #98-027R
Room 102 – Cotton Annex
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Washington D.C. 20250-3700

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Karen J. McNish

Re: Comments on Proposed Rule For Advanced Meat Recovery.

The Administration speaks to a science based food safety system. The Secretary is responsible for complying with policy. The Undersecretary and the F.S.I.S. Administrator speak to a science based food safety, but as of yet, where is the plan of action?

Meat scientists from industry, academia, and including the F.S.I.S. Administrator have stated "This is not a food safety issue; meat produced by Advanced Meat Recovery Systems is safe and wholesome.

How does F.S.I.S. account for the proposed rule on Advanced Meat Recovery? How does the Secretary comply with the President's Executive Order #13100?

The F.S.I.S. Administrator speaks to "using science to avoid chaos in the food safety realm", which then poses the question, are current standards setting accomplished by special interest advocates?

Then why additional proposed arduous regulation? Where is the science supporting the Agency's decision to promulgate this proposed rule?

Why is meat produced by Advanced Meat Recovery singled out for special rulemaking?

It is the Agency's responsibility to apply the law equally and uniformly. However, one could suspect the Agency's agenda when other processes purporting to render "meat" have been free of similar Agency examination. How can a rendered byproduct be accepted by the U.S.D.A.'s School Lunch Program escape being labeled: contains rendered meat?

The simple question that must be addressed by U.S.D.A. is the following: Why has the U.S.D.A.-A.M.S. allowed the adulteration of ground beef in the School Lunch Program?

Whereas, meat produced by Advanced Meat Recovery that is deemed safe and wholesome by the Agency in public pronouncements, is specifically prohibited by A.M.S. without benefit of science.

The Agency must apply the law uniformly and without prejudice. The Agency is charged by Executive Order 13100 with applying a seamless, science based food safety system. The facts speak for themselves; the Agency is suspect of favoritism.

Based on the foregoing, I respectfully request the withdrawal of this burdensome rulemaking. The Agency's original rule, is a good rule, it is a sound rule and relied on by industry.

A Consumer,

Karen J. McNish
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