



# Public Citizen

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Joan Claybrook, President

April 2, 2001

FSIS Docket Clerk  
Cotton Annex Building, Room 102  
300 12<sup>th</sup> Street, S.W.  
Washington, DC 20250-3700

98-062P  
98-062P-11  
Wenonah Hauter, Director

RE: Docket Number 98-062P

Dear Sir or Madam:

On behalf of Public Citizen, I am writing to oppose the proposed Performance Standards for On-Line Microbial Reprocessing of Pre-Chill Poultry Carcasses.

Public Citizen is consumer organization founded by Ralph Nader in 1971. We represent some 150,000 members.

We oppose this proposed standard for a number of reasons.

First, the need to use chemical compounds such as trisodium phosphate (TSP) and acidified sodium chlorite to kill potential food-borne pathogens has been caused by excessive line speeds during the processing of chicken carcasses. Line speeds need to be reduced so that plant workers and federal and/or state inspectors can do their jobs properly and reduce the need to reprocess carcasses that contain excessive viscera.

Second, with the implementation of revised inspection standards called for by *American Federation of Government Employees, et. al v. Daniel Glickman, et. al*, federal food inspectors are not permitted to inspect carcasses properly in HACCP-based Inspection Models Project (HIMP) plants since they are not able inspect the backside or inside the cavity of processed chicken carcasses as they reach the end of processing lines. Consequently, excessive viscera that would otherwise be detected using traditional inspection methods may be going unnoticed.

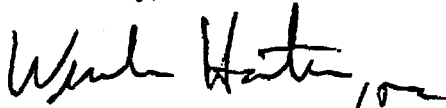
Third, we are not certain that the chemicals being proposed in this proposed rule are safe for human consumption. On February 20, 2001, we requested through the Freedom of Information Act all testing information for Aicide Corporation's Sanova process from

both the Food and Drug Administration and the Food Safety and Inspection Service. We have yet to receive this information to evaluate the testing protocol. Furthermore, we object to the determination made by the Food Safety and Inspection Service that there be no labeling requirement for chicken carcasses processed with the Sanova process. We have yet to receive any information from FSIS concerning the logic for this decision.

Fourth, notwithstanding the assertions contained in December 1, 2000 Federal Register notice on this proposed rule, federal food inspectors and plant workers have indeed suffered from deleterious respiratory health problems from inhaling TSP fumes. The application of this chemical needs to be stopped until all necessary health and safety protections have been applied. We enclose a Material Safety Data Sheet on the product for your information.

We find it very disturbing that the Food Safety and Inspection Service is entertaining the use of all sorts of untested technology to subvert and undermine the work that its employees are charged to perform under the food inspection statutes. Instead of ensuring that the food we eat is safe and wholesome, we find that the Food Safety and Inspection Service is searching for easy fixes so that industry can increase its profits, while paying lip-service about food safety to consumers. This is a very dangerous trend. This proposed rule is yet another element in that dangerous trend.

Sincerely,



Wenonah Hauter, Director  
Critical ~~Mass~~ Energy and Environment Program

enclosure