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FSIS Docket Clerk
Room 102
Cotton Annex Building
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Washington, DC 20250-3700

98-062P
98-062P-12
Alice L. Johnson, DVM

RE: Docket Number 98-062P
Performance Standards for On-Line Antimicrobial Reprocessing of Pre-Chill Poultry Carcasses Federal Register: December 1, 2000 (Volume 65, Number 232)

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Dear Ms. Moore:

The National Turkey Federation (NTF) appreciates the opportunity to submit comments in response to the Food Safety and Inspection Service (FSIS) proposed rule on Performance Standards for On-Line Antimicrobial Reprocessing of Pre-Chill Poultry Carcasses, **65** Federal Register, December 1, 2000. **NTF** is the only national trade association exclusively representing all segments of the turkey industry, including growers, processors, breeders, hatchery owners and allied industry. NTF's membership accounts for more than **95** percent of all turkey production and processing in the United States.

The proposal published by the agency would permit, on a voluntary basis, the on-line reprocessing of pre-chill carcasses that are accidentally contaminated with digestive tract contents during slaughter. NTF strongly supports the voluntary application of on-line reprocessing; however, to require performance standards specific for on-line reprocessing is not appropriate and is inconsistent with the Pathogen Reduction/HACCP regulation.

Slaughter Interventions

On-line reprocessing is just one of several intervention **steps** that many poultry companies are exploring in order to provide the safest possible product to the consumer. This intervention, similar to many others in a slaughter facility, should be considered when a plant is developing a HACCP plan. If appropriate, the intervention should be included **as** a part of a company's plan with the plant assuming the responsibility to validate the effectiveness of the intervention as outlined in the HACCP final rule. To establish a separate performance standard specific for on-line reprocessing or any other intervention/technology is not consistent with the agency's HACCP initiative.

NTF strongly believes that following the HACCP principles for technology and intervention is the most appropriate manner to determine the acceptability of the process. It is difficult to understand why the agency believes that on-line reprocessing should be



singled out as a “special” intervention requiring the agency to take such action. If the agency moves forward with a performance standard specifically for on-line reprocessing the question must then be raised: Is it the intent of the agency to establish performance standards for all current and any yet to be applied interventions in slaughter facilities? This direction by the agency would appear to be inconsistent with HACCP and would place obstacles to exploration of new technologies and intervention for improving the safety of meat and poultry products.

Pre-Chill Performance Standards Inconsistent with HACCP

Post-chill performance standards and criteria are already in place under the Pathogen Reduction/HACCP regulations. The pre-ambule to this final regulation indicates the agency believes that performance tests at the end of production is the only point that reflects all steps in the production process and ultimately, all elements of the HACCP plan. It would appear that by proposing pre-chill performance standards as described in this proposal, FSIS is reconsidering the current end point performance standard as not reflecting appropriate production validation.

Moreover, additional agency requirements for zero visible contamination are also in place prior to product entering the chiller at whatever point it is introduced. It would appear that in keeping with the departure from command and control, the agency would allow facilities to determine the appropriate technology or intervention necessary for the individual establishment.

For the above listed reasons, NTF encourages the agency to proceed with finalizing the proposal for applying on-line reprocessing on a voluntary basis. However, NTF does not feel that pre-chill performance standards for this on-line procedure are appropriate. In fact, the establishment of pre-chill performance standards would reflect a command and control approach to new technologies and intervention that is inconsistent with the HACCP philosophy.

NTF strongly believes that new technologies and interventions such as on-line reprocessing are appropriate within facilities if scientific documentation for validation of the technology/ intervention reveals the reduction or elimination of the identified hazard. This validation along with the current regulatory requirements for zero tolerance for fecal contamination and the pathogen reduction standards/criteria should be adequate. By requiring tighter criteria are met when using on-line reprocessing, the agency is discouraging companies from pursuing such technologies/interventions. Furthermore, the agency is focusing on one particular step or process in the slaughter facility instead of considering the cumulative effect that the agency has deemed appropriate and used for the justification of the current performance standard. It would appear that any process that reduces or eliminates a hazard should be acceptable. The establishment of a pre-chill performance standard would result in maintaining the status quo.

NTF realizes however, that validation must be appropriate for determining the effectiveness of the reduction or elimination of the hazard. This validation is a part of a company HACCP plan that is available to FSIS for review. The agency should consider a significant reduction in generic *E. coli* through the technology/ intervention being utilized during on-line reprocessing as adequate to validate that the process is working. **This** combined with compliance with the zero tolerance for visible fecal, meeting the finished product performance standards and the pathogen reduction standards and criteria should assure FSIS that carcasses are safe and wholesome.

NTF also encourages the agency to remain flexible with regards to acceptable rinses or procedures for on-line reprocessing or any other new technology or intervention. In the proposal, FSIS mentions specific chemicals currently in use. We hope that the agency will allow for plant validation of any chemical or process to be considered for on-line reprocessing or other use if the scientific documentation justifies.

Conclusion

On-line reprocessing is appropriate for poultry slaughter facilities on a voluntary basis. The agency should move away from the proposal to establish a set pre-chill performance standard. Current performance standards for zero tolerance for fecal contamination, finished product pre-chill performance standards, and post-chill pathogen reduction standards and criteria are adequate for the determination of process control. Slaughter facilities should be allowed to use the technologies/interventions needed for on-line reprocessing with the understanding that it is the plant's responsibility to validate that the process is reducing or eliminating the microbiological hazard with appropriate scientific literature and in-plant data.

NTF appreciates the opportunity to comment on this proposal.

Sincerely,



Alice L. Johnson, **DVM**

Vice President, Scientific and Regulatory Affairs