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ROCCO, INC.

One Kratzer Road
Harrisonburg, VA 22802
540-568-1400
FAX 540-568-1401

ROCCO

April 2, 2001

FSIS Docket Clerk
Room 102
Cotton Annex Building
300 12th Street, SW
Washington, DC 20250-3700

98-062P
98-062P-13
Charles Link

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)

Dear Ms. Moore:

Rocco Poultry Operations, Inc. 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. Rocco Poultry Operations, Inc. (Rocco), doing business as Shady Brook Farms and Rocco Farm Foods ranks among the top 6 producers of turkey products and 29th among chicken processors.

Rocco is fully supportive of the referenced docket that would permit, on a voluntary basis, the on-line reprocessing of pre-chill poultry carcasses that are accidentally contaminated with digestive tract contents during slaughter. Adoption of this process will provide the industry with another intervention step that will enable it to provide the consumer with poultry products that are microbiologically safer than that obtained from normal on-line birds or off-line reprocessed birds.

Under the current rules of off-line reprocessing, the requirement to segregate visibly contaminated carcasses by removal from the slaughter line to a designated reprocessing station involves a significant amount of handling. Once a carcass is determined to be visibly contaminated, it is removed from the slaughter line with the viscera separated from the carcass and condemned. The carcass is then placed on a rack or moving reprocessing line to be transferred from the point of removal through the slaughter facility to the designated reprocessing station. Carcass removal, viscera dropping and carcass placement are all done by hand. Once the carcass reaches the reprocessing area, it may be once again taken from the rack or reprocess line to begin the reprocessing

procedure. The carcass is reprocessed **as** determined by the facility with FSIS approval and then placed in vats or other type of approved holding area on ice for re-inspection. After **this** re-inspection, the carcass is dumped in the chiller either by hand or mechanical conveyance. The handling and transferring of these carcasses provides an opportunity for cross-contamination. A continuous carcass flow down the slaughter line adds to the safety and quality of the carcass by allowing equipment and rinses to work appropriately and by placing carcasses in the chill tanks for temperature reduction. When slaughter lines are stopped or speeds decreased additional concerns for safety and quality may result.

In addition to cross contamination concerns, once carcasses are removed from the slaughter line they **are** not subject to the various processes on **the continuous** line **that** serve to improve the microbial and quality aspects of the carcass. Current slaughter line configurations include many interventions and technologies that have a cumulative effect on the safety and quality of the carcass upon entering the chill tank. Many of these interventions and technologies were not in place when the **original** off-line reprocessing procedures were introduced by the agency and thus the effect on the carcasses was not considered. When carcasses are removed from the current slaughter line, in most cases, they are not subject to the cumulative effect of the various processes. In many facilities, space limitations at the reprocessing stations and the FSIS requirement to hold carcasses after reprocessing, prevent the reprocessed carcasses from receiving the benefits of this cumulative effect found on the continuous slaughter line.

Another important component of on-line reprocessing is that carcasses **staying** on the slaughter **line** reach **the** chill tanks and therefore are subject to temperature reduction faster than carcasses that are removed **from** the slaughter line. Temperature reduction is a key in eliminating bacterial **growth**.

On-line reprocessing is in reality only one of several interventions used in processing poultry. Therefore, Rocco encourages the agency to proceed with finalizing the proposal for applying on-line reprocessing on a voluntary basis. However, we do 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.

Post -chill performance standards and criteria are already in place under the Pathogen Reduction/HACCP regulation. The pre-ambule to the Pathogen Reduction/HACCP regulation indicates the agency believes that in *Salmonella* performance tests the end of production is the only point that reflects all steps in the production process and ultimately, all elements of the HACCP plan. Poultry slaughter facilities include reprocessing **as** a part of a slaughter HACCP plan. Whether the reprocessing is done **on-**line or off-line, poultry plants have identified **this** step in the process **as** a point where the microbial **hazard can** be eliminated or reduced to **an** acceptable level. It is therefore incorporated into the HACCP plan and requires validation that the established critical

limits are appropriate to eliminate or reduce the hazard, in this case, a microbiological hazard.

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.

Rocco 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 that 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.

We do agree that establishing a performance level that must be met to validate the efficacy of the on-line antimicrobial reprocessing **step** is appropriate. It would therefore be appropriate for companies wishing to be eligible for on-line reprocessing to show a significant reduction in microbiological counts using organisms such **as** generic E. coli. Generic E. coli has been recognized by the agency **as** an indicator organism.

In order to determine the appropriate measurement point for evaluating the efficacy of on-line reprocessing and to address the questions raised in the proposed rule, **Rocco** participated in a 37-plant study conducted by the National Chicken Council (NCC). The study was focused in plants employing either TSP or acidified sodium chlorite **as** the antimicrobial treatment. (**A** summary of the study and the protocol were forwarded via the NCC comments.) The data from this study indicates that on-line reprocessing can be effectively validated prior to the chilling process. It also indicates that a numeric performance level would not be appropriate because of plant to plant variability. Additionally, the data further indicates that generic E. coli would be an effective organism to use **as an** indicator organism to validate the on-line reprocessing step.

Salmonella spp. should not be part of the validation process for on-line reprocessing since it is not closely associated with digestive *tract* **contamination**. More importantly, its occurrence on poultry carcasses has become **so** sporadic that it is no longer an appropriate organism to **use** for validation or verification purposes with respect **to** individual processing **steps** on the slaughter line.

Based on the data obtained from the NCC study and previously performed studies from both industry and petitioners, performance level for validating on-line antimicrobial reprocessing could be established as follows:

- 1). Carcasses contaminated with digestive tract contents should have significantly ($p \leq .05$) lower *E. coli* counts (**post** anti-microbial treatment) than visibly clean carcasses identified ~~at~~ the inspection station and sampled before the carcass washes; and,
- 2). Carcasses contaminated with digestive tract contents (**post** anti-microbial treatment) should have *E. coli* counts not different than ($p > .05$) or less than ($p \leq .05$) visibly clean carcasses identified at the inspection station and sampled following the on-line antimicrobial treatment step.

In conclusion, **Rocco** believes that 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. 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. 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.

Respectfully Submitted,



Charles Link
Director, Regulatory Affairs
Rocco Poultry Operations, Inc.