



NATIONAL CHICKEN COUNCIL

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Handwritten notes and signatures, including 'D. D. DeLoach' and 'Romy to'.

September 14, 2000

Mr. Thomas J. Billy
Administratdr
Food Safety and Inspection Service
U.S. Department of Agriculture
Room 331-E Whitten Building
Washington, DC 20250-3700

98-062P
98-062P-3
J. Stephen Pretanik

Re: Rhodia, Inc., Petition to Allow On-Line Reprocessing of Poultry
Carcasses, September 18, 1998.

Handwritten initials 'SJA' and 'A'.

Dear Mr. Billy:

The National Chicken Council and its member companies, who produce and process more than 90 percent of the broiler chickens in the United States, are committed to providing consumers with the safest product possible. It is because of this commitment that we ask that these comments and supporting data be included in the referenced docket.

Our main concern is that if FSIS adopts the performance standards proposed in the Rhodia petition, consumers will be deprived of the opportunity to purchase poultry products that are microbiologically safer than that obtained from normal on-line birds or off-line reprocessed birds. The proposed performance standards, as the enclosed data show, are neither realistic nor achievable utilizing current acceptable sampling and analytical procedures; and, if adopted, will effectively preclude the use of this food safety enhancement process in poultry slaughter establishments.

The data presented in Part I of the enclosed data set clearly show that trisodium phosphate (TSP) is an effective antimicrobial; and, that on-line reprocessed birds are microbiologically superior to normal, on-line visibly noncontaminated birds and to off-line reprocessed visibly contaminated birds. The data also show that the proposed performance standards in the Rhodia petition are not achievable even with the use of their own product (TSP).

The benefit to the consumer in treating all birds as if they were visibly contaminated, i.e., subjecting every bird to the on-line reprocessing procedure, is further demonstrated in the data presented in Parts 2a and 2b. This data once again, however, shows that the performance standards proposed in the Rhodia petition are not achievable.

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Part 3 of the enclosed data addresses the influence of freezing versus refrigeration of samples. This data shows that freezing samples lowers *Salmonella* spp. and *E. coli* incidence and *E. coli* counts as opposed to refrigerating. The influence of freezing versus refrigerating samples is also seen in the data presented in Parts 1 and 2a. The lower microbiological values submitted by Rhodia in support of their proposed performance standards may, in part, be explained by the difference (i.e. freezing) in the way they handled their samples.

On-line reprocessing is in reality a food safety enhancement process that significantly improves the microbiological quality of poultry products purchased by consumers. The efficacy of this process should be based on achieving a statistically significant reduction in the incidence of *Salmonella* spp. and *E. coli* levels on finished poultry carcasses exiting the chiller. Applying this performance standard to carcasses post-chill would not only be consistent with the application of FSIS's current microbiological standards; but it also more accurately reflects the quality of the product purchased by consumers.

Adopting a "statistically significant reduction" performance standard is preferable to a "fixed number" performance standard that may preclude or restrict the adoption of this food safety enhancement process. In the interest of providing consumers with the safest product possible, every effort should be made to encourage on-line reprocessing, not restrict its use.

We believe this can be accomplished by modifying the proposed amendment to 9 C.F.R. 381.91 contained in the Rhodia petition to read: "(c) Notwithstanding the provisions of subsection (b) of this section, any carcass of poultry accidentally contaminated during slaughter, but determined to not be grossly contaminated, with digestive tract contents may remain on the main processing/slaughter line and be promptly reprocessed while on-line through the application of a substance or a processing system that has demonstrated a statistically significant reduction in the incidence of *Salmonella* spp. and *E. coli* levels on finished poultry carcasses exiting the chiller."

Respectfully submitted,



J. Stephen Pretanik
Director of Science and Technology