



NATIONAL CHICKEN COUNCIL

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98-062P
98-062P-8
Stephen Pretanik

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Re: Docket Number 98-062P, Performance Standard for On-line Antimicrobial Reprocessing of Pre-Chill Poultry Carcasses

Dear Sir or Madam:

The National Chicken Council (NCC) is the national trade association representing the integrated chicken industry. NCC member companies produce, process and market 92 percent of the chickens sold in the United States.

We are 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.

On-line reprocessing is in reality only one of several interventions used in processing poultry. We strongly believe it would be inappropriate to establish a performance standard for this step or any food safety intervention steps prior to the final intervention step i.e., the chlorinated chiller. To do so would be in opposition to the HACCP principals that USDA and industry are trying to employ. On-line reprocessing should be validated as was off-line reprocessing and verification should be accomplished per an establishment's HACCP plan. It should not be subject to a different performance standard post chill and especially not to a performance standard imposed prior to the final intervention step.

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. 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, NCC conducted a study in 37 plants employing either TSP or acidified sodium chlorite as the antimicrobial treatment. A summary of the study is included as Attachment 1 and the study protocol is included as Attachment 2.

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 this study and previously performed studies from both industry and petitioners, we recommend that the performance level for validating on-line antimicrobial reprocessing be established as follows:

1). Carcasses contaminated with digestive tract contents should have significantly ($p \leq .05$) lower *E. coli* counts, post treatment, than visibly clean carcasses identified at the inspection station and sampled before the carcass washes; and,

2). Carcasses Contaminated with digestive tract contents should have *E.coli* counts, post treatment, not different than ($p > .05$) or less than ($p \leq .05$) visibly clean carcasses identified at the inspection station and sampled prior to the on-line antimicrobial treatment step.

This may be stated in the final rule as follows:

9 CFR Part 381

381.91 Contamination

(c) In lieu of the provisions in paragraph (b) of this section, any poultry carcass contaminated during slaughter with digestive tract contents may remain on the main processing/slaughter line and be reprocessed while on-line through use of **a wash and** an antimicrobial technique, in accordance with the Hazard Analysis and Critical Control Points (HACCP) system requirements in part 417 of this chapter. Validating data, generated under conditions of in-plant commercial operations, must demonstrate that the visibly contaminated carcasses that are reprocessed on-line meet the pre-chill performance level of: **generic *E. coli* counts must be significantly lower ($p \leq .05$) than visibly clean carcasses sampled pre-wash; and, lower than ($p \leq .05$) or not different than ($p > .05$) visibly clean carcasses sampled post-wash.** Birds whose entire carcass is contaminated by digestive contents under paragraph (b)(1) of this section or birds that have been mutilated under paragraph (a) of this section may not remain on the main processing line and may not be reprocessed using the on-line antimicrobial technique.

Respectfully submitted,



Stephen Pretanik

Director of Science and Technology