



July 13, 2010

Docket Clerk
U.S. Department of Agriculture
Food Safety Inspection Service
Room 2-2127
George Washington Carver Center
5601 Sunnyside Avenue
Mailstop 5474
Beltsville, MD 20705-5474

***Re: Docket No. FSIS-2009-0034: Pre-Harvest Management Controls and Intervention
Options for Reducing Escherichia coli O157:H7 Shedding in Cattle-May 2010***

To Whom It May Concern:

Formed in 1906, the American Meat Institute (AMI) is the nation's oldest and largest trade association representing packers and processors of beef, pork, lamb, veal, turkey, and processed meat products. AMI members manufacture more than 90 percent of these products. Also, approximately 80 percent of AMI member companies are classified as small or very small according to Small Business Administration standards. AMI members continue to adopt food safety practices to produce meat and poultry products, which are safe, affordable, and available. The safety of the meat and poultry products AMI members produce is their top priority.

AMI appreciates the opportunity to comment on the Food Safety and Inspection Service's (FSIS or the agency) *Pre-Harvest Management Controls and Intervention Options for Reducing E. coli O157:H7 Shedding in Cattle* (Guide). This sharing of information strengthens the partnership between industry and government in producing safe meat and poultry products. This process is an opportunity for the meat and poultry industry to provide meaningful feedback so policy can be implemented with clarity; resulting in timely, effective and cost effective policy changes.

Overview

As HACCP plans were implemented, the intent of the hazard analysis addressing pre-harvest raw material supply was defined immediately before the livestock entered the establishment or came on the establishment's premises. These portions of the hazard analysis addressed programs that were controlled by federal regulations such as withdrawal times of veterinary drugs or adherence to ruminant feed ban instead of supplier specification requirements.

However, as stated in the Guide, the regulatory pre-harvest scope has expanded without the proper interpretation of scientific facts. The Guide provides informational resources on pre-harvest management control for reducing *E. coli* O157:H7 shedding in beef cattle. Currently, packers and processors rely on programs implemented at the producer level to address animal husbandry practices administered at the production location. Since the packer/processor has no direct control over their supply base, the use of pre-harvest programs would be difficult to implement. When supplier programs can be used to support the hazard analysis determination, then these producer driven pre-harvest programs could become part of the HACCP plan.

The Guide does not address the fact that a large amount of beef livestock are also marketed through auctions. Customer specifications would not be feasible in this type of marketing scenario as pre-harvest on-farm information would not be known. Whereas, plants and processors that buy livestock directly from feedyards or dairies could be able to address a specification program. Also, recent emphasis has been placed on small locally raised and processed livestock as the history of the animal is better known. The impact of the Guide on these marketing scenarios needs to be reviewed before final issuance.

The Guide states that "slaughter establishments receive their cattle from beef producers that implement one or more documented pre-harvest management practices to reduce fecal shedding." This statement is noteworthy, but creates issues with implementation. First, as stated above, how would this requested information from the pre-harvest supplier be provided to the packer/processor and the packer/processors' specifications shared to the pre-harvest supplier? To be meaningful, a two-way communication system should be established, which is an incredibly difficult task in today's complex beef marketing arena. Secondly, does information exist that demonstrates that one pre-harvest intervention will reduce shedding of *E. coli* O157:H7? The Guide states, '*Current research has not shown a reduction of E. coli O157:H7 shedding in cattle when these basic principles¹ are used. Nevertheless, FSIS supports the principles because of their foundation in animal health and welfare. They provide a foundation for the processing interventions and sanitary dressing procedures used to control E. coli O157:H7 contamination in raw beef.*'

¹ Clean water, clean feed, clean environment that is appropriately drained, separate housing of calves and heifer or reduced animal density, and biosecurity-wildlife exclusion to the extent possible, page 3, Guide.

AMI is concerned that current research does not conclusively demonstrate a reduction in shedding, yet the agency stills supports these principles for animal health and welfare, which is not supported or in the scope of purpose of this Guide. While these are noble goals and ones that the producer community would agree to, the direct link to reduced shedding of *E. coli* O157:H7 is unclear. If the research does not show a reduction in shedding, then what is the practical purpose of the Guide?

AMI maintains support of beef and dairy cattle associations to continue to implement husbandry practices that may reduce *E. coli* O157:H7 shedding, but the agency should be cognizant that information sharing they request should cover all livestock marketing methods. The Food and Drug Administration, Department of Agriculture's Animal and Plant Health Inspection Service and state veterinarians have an important role in assuring the animal health programs currently in place are being implemented properly. The removal of time consuming barriers, that are obstacles to implementation of trials, approvals of systems and interventions that will impact food safety should be continuously reviewed by governmental agencies to aid in meeting common food safety objectives with industry. As previously stated, AMI members actively seek and evaluate new food safety technologies and pre-harvest interventions when they become available. AMI encourages the timely regulatory approval of effective pre-harvest interventions.

To fully benefit public health, a mechanism for information sharing relating to potentially problematic supply sources is needed. If implemented properly, this information could have a substantial impact on food safety. Although this is an industry driven initiative, from a marketing standpoint this concept could be viewed negatively by regulators.

Research Summary

Throughout the Guide references are made to the inability of on-farm management controls to reduce the shedding of *E. coli* O157:H7, specifically:

- **“Water and Feed Management:** Providing cattle with treated water sources is one way to reduce herd transmission; however, it does not directly reduce *E. coli* O157:H7 shedding in cattle.”
- **“Feed Types and Feeding Strategies:** Changes in diet can alter the *E. coli* O157:H7 shedding in cattle, but the observed change is inconsistent.”
- **“Management Practices and Transportation:** Sound management practices, including proper sanitation measures and pest control, can reduce levels of *E. coli* O157:H7 and other pathogens in the cattle's environment.” But in the detail of Clean and Dry Bedding it is stated that research suggests that clean bedding and housing does not reduce *E. coli* O157:H7 fecal shedding in cattle. Also, none of the other subparts of this bullet point (sanitation practice on farms and feedlots, housing, nor transportation) addressed any methods to address shedding of *E. coli* O157:H7 in cattle. Therefore, it is unclear how the conclusion was made that management practices can impact *E. coli* O157:H7 shedding.

Additionally, the Guide reviews many pre-harvest related documents. It would be helpful if the critical operation parameters from each of the documents were stated and the specific scientific documentation that was referenced in the summary was cited.

In the note on page 23 of the Guide, it states, "In addition to EHEC, cattle reservoirs of several food borne pathogens that include *Campylobacter* spp., *Cryptosporidium* spp., *Listeria* spp., and *Salmonella* and also of several emerging human diseases, such as *Helicobacterium pylori* and *Mycobacteria paratuberculosis*." Many of the pathogens listed are ubiquitous to the environment such as on money or public transportation. This supports the long-held understanding that good personal hygiene as well as proper food preparation is a means of eradication of possible illness caused by raw foods. The note adds nothing to the purpose of the Guide and AMI recommends it should be removed.

Summary

In summary, AMI encourages federal regulatory agencies to approve pre-harvest interventions in a timely fashion that can truly impact shedding of *E. coli* O157:H7. AMI supports the use of appropriate pre-harvest programs to reduce shedding of *E. coli* O157:H7, but:

- based on information provided in this Guide there is not sufficient scientific evidence to support the incorporation of such programs; and
- because of the current marketing differences of beef cattle, this concept, at this time, is impractical to implement.

Again, AMI appreciates the opportunity to provide comment on the Guide. Thank you for your consideration of the comments provided above. If there are any questions about the above comments, please do not hesitate to contact me at sgoltry@meatami.com.

Respectfully submitted,



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cc: J. Patrick Boyle
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