



September 14, 2011

Docket Clerk
United States Department of Agriculture
Food Safety and Inspection Service
Room 2-2127 George Washington Carver Center
5601 Sunnyside Avenue Mailstop 5474
Beltsville, Maryland 20705-5474

Re: Salmonella Verification Sampling Program: Response to Comments on New Agency Policies and Clarification of Timeline for the Salmonella Initiative Program (SIP) (Docket No. FSIS-2008-0008)

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 products, which are safe, affordable, and available. The safety of the products AMI members produce is their top priority.

On February 28, 2008, AMI submitted comments on the *Federal Register* Notice published January 28, 2008 (*Fed. Reg.* Vol. 73, No. 18, pp. 4767-4774). Below are comments in response to *Salmonella* Verification Sampling Program: Response to Comments on New Agency Policies and Clarification on Timeline for *Salmonella* Initiative Program (SIP), *Federal Register* Vol. 76, No. 134, pp. 41186 - 41192.

SIP is open to all establishments

AMI is encouraged that SIP will be open to all establishments. AMI supports process monitoring and control as a means to assure products are uniformly processed with appropriate interventions to reduce or eliminate harmful bacteria. Even though most of the information contained in the Notices relate to poultry, pork and beef members are interested to learn more about SIP. For the AMI members that participate in market hog HACCP Inspection Models Project (HIMP), AMI requests that implementation be extended to 120 days after SIP education to the pork HIMP plants is completed.

SIP for Beef

Although SIP is open to all establishments, since the performance standard for steers and heifers as well as cows and bulls is lowest of all specie classes, can the agency provide more information regarding the expectation of a SIP program for beef? Is the agency's intent for this program to become a pathogen initiative program (i.e. *E. coli* O157:H7)?

Implementation of SIP or waivers are lost

In the Notice it is stated that SIP must be adopted to maintain waivers in HIMP and online reprocessing (OLR). It is also unknown if HIMP and OLR will continue to exist or will they be consolidated into SIP or vice versa. AMI suggests that all programs be consolidated under a term that is less prescriptive than SIP and the program is allowed to expand based on improved public health outcomes.

Resource Allocation

The industry implements controls in the manufacturing process to prevent product contamination and foodborne illness. Prior to HACCP, it was common for plants to subscribe to various quality control programs including error cause removal programs to correct flaws in the system. Through this process, analysis is completed and resources are allocated to correct the out of compliance processes. AMI envisions SIP to be no different; resources (inspection personnel, and testing programs) would be properly allocated based on out of compliance processes which would be supported by the Public Health Information System when fully implemented. AMI supports this type of inspection program.

Science Focused

Good science must be used to address issues and improve the manufacturing process. An example of this is the comment on page 41187 of the Notice that states, "Significantly, outbreaks resulting in human illness involving pork have been consistently identified on an annual basis, suggesting pork as a vehicle for salmonellosis." No doubt this statement from the Centers for Disease Control and Prevention (CDC) is correct but this is not a statement of prevention. In fact, the Notice states that a compliance guide will be issued in 120 days and FSIS will confer with the pork industry. This alludes to more testing instead of analyzing the data and implies that all pork issues are from the consuming of the same type or pork. An alternative would be to analyze the CDC data (some of which is incomplete as to type of pork product) and determine if there are common causes, i.e. BBQ, or products where species or seasoning are added after cooking. A post analysis discussion of learnings could then take place. The recent Notice, "Assessment of the Hazards Associated with Pork Barbecue with Vinegar and Pepper-Based Sauce" is an example of how learnings can be communicated. This science focused approach to manufacturing practices would have a more immediate impact.

Public Health Driven Food Safety

The setting of baseline targets should be based on current technologies and the ability of the government to approve new technologies. The reduction of microbiological performance standard targets should be transparent to the affected industry. The improper setting of these targets can have unintended consequences to both businesses and their employees.

The American Meat Institute appreciates the opportunity to submit comments in response to this *Federal Register* Notice. If you have any questions regarding the above-outlined comments, please contact me at sgoltry@meatami.com. Thank you.

Respectfully submitted,

A handwritten signature in black ink that reads "Scott J. Goltry". The signature is written in a cursive style with a large, stylized initial "S".

Scott J. Goltry
Vice President, Food Safety and Inspection Services