



September 16, 2009

Jerold R. Mande, M.P.H.
Deputy Under Secretary Food Safety
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Mr. Mande:

Over the past few weeks, officials within the Food Safety and Inspection Service (FSIS) have voiced concerns regarding the American Meat Institute's (AMI) petition to allow electron beam irradiation (e-beam) to be applied to the surface of beef carcasses as a processing aid. Given the substantial food safety benefits this technology offers it seems that the technical issues being raised four years after the petition's submission can be appropriately addressed during the notice and comment rulemaking process that would be required to allow use of this technology in the manner requested.

The requested action pending before USDA is very simple. AMI has asked that FSIS recognize e-beam irradiation as a processing aid when applied to the surface of chilled beef carcasses and that the agency treat this process no differently than it treats any other processing aid. AMI has provided the necessary research and rationale to support our request.

We recognize this regulatory decision is the first step in a process of developing and further validating the technology in an operational setting and promulgating appropriate regulations to assure the safe and appropriate use of the technology. We continue to believe this technology can be another effective microbiological intervention to enhance the safety of the meat supply.

AMI respectfully requests the opportunity to meet with you to resolve any issues of concern and to clarify any misunderstanding that may exist regarding the regulatory process to implement this promising technology. Thank you in advance for considering our request for a meeting.

Sincerely,

A handwritten signature in black ink that reads "James H. Hodges". The signature is written in a cursive, flowing style.

James H. Hodges
Executive Vice President

cc: Alfred Almanza
David Lazarus
Adela Ramos