



NATIONAL MEAT ASSOCIATION

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Docket Clerk,
U.S. Department of Agriculture (USDA), FSIS
Room 2-2127
George Washington Carver Center,
5601 Sunnyside Avenue,
Mailstop 5474,
Beltsville, MD 20705

Re: FSIS Docket Number: FSIS-2010-0008
FSIS Public Meeting on Product Tracing for *E. coli* O157:H7

Gentlemen:

On behalf of the members of National Meat Association (NMA), we respectfully submit the following comments in response to the FSIS Public Meeting on Product Tracing on *E. coli* O157:H7.

Organized in 1946, NMA represents the interests of meat packers and processors throughout the United States. With approximately 225 general member companies, many of whom had a vested interest in the proceedings of the FSIS Public Meeting on Product Tracing on *E. coli* O157:H7. NMA has a great interest in this request for comment.

Relative to trace back, as FSIS assigns EIAOs the principal trace back responsibilities, NMA feels that the EIAO's trace back methodology should be transparent to all stakeholders relative to the specific methodology that will be utilized. Stakeholders should be provided the opportunity to comment on the specific methodology that will be utilized, not the general framework. We feel that the methodology should be precise and based on facts and science. The EIAOs should receive adequate training for their trace back responsibilities.

As EIAOs go upstream and conduct verification activities at suppliers, we feel an important component is the understanding of the supplier's testing procedures and laboratory methodology. As you are aware, NMA has been an advocate for FSIS to provide assistance to the test kit manufacturers and third party laboratories so that there is an understanding of what is necessary to ensure appropriate methods are available for establishment testing and usable results that

provide necessary feedback to the establishment. This sort of data is what we believe should be the primary focus when making a systems assessment of the facility, as opposed to components in the currently described methodology that directs the EIAO to review all GMP compliance, SSOP findings, and NRs, which is still important. While there may be information in these programs that is important, we do not believe these programs have the direct correlation to *E. coli* O157:H7 that the testing methodology does, in order to be prioritized in the EIAO's trace back investigation.

The methodology also includes a review of an establishment's testing records for generic *E. coli* and the agency's *Salmonella* testing results. There is no evidence of which we are aware linking *E. coli* O157:H7 contamination to generic *E. coli* results (which, based on experience, can remain within regulatory limits during periods of high O157 incidence) or to *Salmonella* test results (especially if the establishment was not in a performance set at the time the suspect product was produced). Reviewing this information is useful for an overall view in a full food safety assessment, but it is unclear as to the value when there is no apparent correlation between generic *E. coli*, *Salmonella* and *E. coli* O157:H7 and a full assessment is not being performed.

We strongly encourage the Agency to quickly distribute the Compliance Guidance resources on test kits and laboratories and verify that robust testing is appropriately being applied at the supplier.

As part of verification of testing at the supplying establishment, we would remind FSIS that when an establishment is testing with an appropriate methodology, some positives will occur. It is our understanding that it is the establishment's responsibility to investigate each positive. As part of the investigation, the establishment must determine whether the positive was a random event or had an assignable cause (FSIS Directive 10,010.1, Rev. 3). If the establishment has positive findings over what is normally anticipated (when viewed over a period of time, or by type of product), the establishment may no longer be able to rely on its negative findings absent additional evidence.

We strongly encourage the Agency to quickly distribute the Compliance Guidance resources on test kits and laboratories and verify that robust testing is appropriately being applied at the supplier. Again, we believe verification of appropriate testing is the most effective means of verification at the supplying establishment, and the Agency needs to provide additional resources for the industry to be able to fully meet this demand, particularly at the small and very small establishments.

Other Comments from the public meeting

During the public meeting, information was provided with regards to the Agency's new sampling method for N-60. NMA is very interested in continuing to work with the Agency in terms of the development of new N-60 testing procedures contained in FSIS Directive 10,010.1, Rev. 3. Our members are concerned that the sample size appears to have increased from 325 grams to about 600 grams. It is unclear whether the Agency will test the entire amount submitted. Is the FSIS method validated for this increased sample weight? And, is there any information demonstrating

that this will provide improved results? Will this information be taken into consideration as the Agency works to provide information to the test kit manufacturers and laboratories regarding testing for the small and very small plants as we move forward?

Conclusion

Thank you for the opportunity to comment on the Agency's current thinking on how to improve trace back investigations and other issues from the FSIS public meeting. We urge FSIS in going forward that providing information to test kit manufacturers and laboratories so that appropriate *E. coli* O157:H7 sampling can be conducted and verified at the supplying establishments, given such testing is the most important step that can provide feedback at these establishments.

Thank you for providing this opportunity to comment.



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