



NORTH AMERICAN MEAT PROCESSORS ASSOCIATION
ASSOCIATION AMÉRIQUE DU NORD DES TRANSFORMATEURS DE VIANDE
ASOCIACIÓN NORTEAMERICANA DE PROCESADORES DE CARNE

May 2, 2011

Dr. Elisabeth Hagen
Under Secretary for Food Safety
U.S. Department of Agriculture
1400 Independence Ave., Suite 224E
Washington, DC 20250

Ref: NAMP petition on “pasteurization”

Dear Dr. Hagen:

The North American Meat Processors Association (NAMP) is a non-profit trade organization that represents small to medium sized meat and poultry processors across North America. Our members strive to produce the highest quality and safest products possible and are committed to food safety. NAMP has a long history of working with FSIS to achieve this mutually beneficial goal.

Within that context we hereby petition USDA’s Food Safety and Inspection Service (FSIS) to define the term “pasteurization” as it applies to meat and poultry products, and to allow the use of the term “pasteurized” on consumer labels.

NAMP members believe the term “pasteurized” should not be limited to heat treated liquid foods, but should also be allowed to describe meat and poultry products that are treated to meet established definitions of pasteurization. Processing technologies have become available that allow for the elimination of vegetative pathogens in meat and poultry products, and the prevention or elimination of post-process contamination. These technologies result in packaged consumer products which are free of enteric pathogens and therefore, are “pasteurized”.

The National Advisory Committee on Microbiological Criteria for Foods (NACMCF) addressed the issue of establishing the equivalence of alternative methods of pasteurization in 2004 and published its findings in a scientific paper in 2005 (Journal of Food Protection, Vol.69, No.5, 2006, Pages 1190–1216).

This document defines pasteurization as:

“Any process, treatment, or combination thereof, which is applied to food to reduce the most resistant microorganism(s) of public health significance to a level that is not likely to present a public health risk under normal conditions of distribution and storage.”

The document also describes several emerging technologies that can be applied to food products to achieve a pasteurization effect.

With respect to consumer labels, the term “pasteurized” best describes meat and poultry products which have been treated using heat, high hydrostatic pressure processing, or applications of chemical antimicrobial treatments to eliminate the risks posed by vegetative pathogens, including *Salmonella*, *Listeria monocytogenes* and *E. coli* O157:H7.

As a matter of process we would note that, for certain categories of products, FSIS acceptance of pasteurization claims can be conveyed immediately through the issuance of routine label approvals. FSIS is legally required to accept the use of such terminology unless it can reasonably assert that the use of such a claim on a given label is either false or misleading. Clearly that is not the case for products that are fully cooked or that have otherwise been processed in a manner that has effectively eliminated potential public health risks from pathogenic organisms, particularly when firms have validated this outcome.

In addition to approving such claims for products in this category, we think it would be advisable for FSIS to issue some sort of public guidance or other communication clarifying its policy in this area.

We also recognize that there is a second category of products where additional work needs to be done to establish acceptable parameters for such claims. For example, in raw beef products, it may be a validated 5-log reduction in *E. coli* O157:H7 and *Salmonella*. For cooked, RTE products, the performance standards might include both a lethality treatment and a post-lethality treatment. The NACMCF definition cited above should serve as the continuing benchmark.

For this second category of product, NAMP is therefore requesting that the agency, in consultation with NAMP, other meat and poultry industry associations, and academic and scientific experts:

1. Define the microbial reductions required to achieve “pasteurization”,
2. Delineate requirements for scientific validation of specific technologies that may be used to achieve the defined reductions,
3. Allow the term “pasteurized” to be used on consumer labels for qualified products,

4. Consider the use of the term to describe combinations of technologies that provide a cumulative pasteurization effect, i.e. heat treatment of RTE processed meat and poultry products in combination with high hydrostatic pressure processing to address possible post-process contamination,
5. Consider the use of the term “pasteurization” to apply to food animal carcasses that have been treated to eliminate vegetative pathogens,
6. Clarify the performance criteria for meeting the definition for carcass pasteurization. This application of the term would be used to designate carcasses, subprimals, cuts and trimmings used as raw materials for further processing.
7. Coordinate with the Canadian Food Inspection Agency (CFIA) and Servicio Nacional de Sanidad, Inocuidad y Calidad Agroalimentaria de México (SENASICA) and other appropriate government agencies in Canada and Mexico, to harmonize the labeling in the North America meat industry.

With respect to Safe Food Handling Labels for raw meat and poultry products, NAMP does not envision that a distinction would be made for pasteurized raw meat and poultry products at this time. Consumer labels for all raw products labels would continue to include Safe Handling and Preparation instructions. This is an issue the agency could revisit when the overall food safety advantages associated with pasteurized raw meat and poultry products are determined.

This petition is not intended to address irradiation. Irradiation is classified as a food additive, and regulations on food irradiation and the labeling of irradiated food products are already in place.

Your consideration is much appreciated. Please let us know if you have any questions, and if NAMP can be helpful in any way.

Sincerely,

/signed/

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Attachment: Journal of Food Protection, Vol.69, No.5, 2006, Pages 1190–1216