



1452 ALAMANCE CHURCH ROAD  
GREENSBORO, N.C. 27406

TELEPHONE: (336) 275-9548  
GREENSBORO WATS: 1-800-632-1010

COUNTRY SAUSAGE

July 19, 2004

FDA  
Docket Number 2003P-0574  
Division of Dockets Management  
5620 Fishers Lane, Room 1061  
Rockville, MD 20852

Dear Sir or Madam:

We at Neese Country Sausage support the petition for a regulatory limit of 100 CFU per gram for *Listeria monocytogenes*. This approach is reasonable and supported by science. As you are aware, this has been the policy of the Canadian Food Safety and Inspection Service for several years.

However, there is another factor to consider when determining which RTE foods to target for increased scrutiny. These are the products with short shelf lives. In a study conducted by Samuel Palumbo published in the *Journal of Food Protection* (December 1986) it was shown that long periods of refrigerated storage could enrich the Lm resulting in a more pathogenic contamination. Products with short (less than 40 days) are much less likely to incubate an infectious dose of Listeriosis. Companies producing short shelf life RTE not shelf stable products should be allowed to show by scientific and historical data that the organism does not multiply to infectious dose levels at refrigerated storage temperatures during the useful shelf life of their products.

Sincerely,  
  
Michael Garrett  
V.P. Manufacturing  
Neese Country Sausage, Inc.

2003P-0574

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ALL PORK

COUNTRY SAUSAGE

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