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United States
Department of
Agriculture

Food Safety
and Inspection
Service

Office of Policy, Program
Employee Development

Washington, D.C.
20250

Dr. Lane Highbarger
Office of Food Additive Safety
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paintbranch Parkway, HFS-255
College Park, MD 20740

JUN 2 2004

Dear Dr. Highbarger:

This letter is a follow up to our previous letter dated April 28, 2004, in regard to GRAS Notice No. GRN 000143, submitted by Precept Foods, LLC, for the use of carbon monoxide as a component of a modified atmosphere packaging (MAP) system for packaging case-ready fresh cuts of beef and pork as well as ground beef and ground pork. The carbon monoxide will be used at the targeted concentration of 0.4 percent of the modified atmosphere packaging (MAP) system.

In our previous evaluation, the Food Safety and Inspection Service (FSIS) had concerns that the proposed use of carbon monoxide may result in meat that has microbial levels indicative of spoilage but appear to be acceptable to the consumer. In addition, FSIS requested data to show packaged meat remained wholesome with an open date code proposed by Precept Foods, LLC, i.e., 35 days for whole muscle cuts and 28 days for ground meat. Subsequent to our letter dated April 28, 2004, representatives from Precept Foods, LLC, met with FSIS and provided additional data to address our concerns.

The data that was submitted on May 12, and May 28, 2004, reflected the evaluation of the shelf life, bloom, and cooked color of ground beef packaged in the Precept Foods MAP system extended to 28 days and the shelf life of whole muscle cuts packaged in the Precept Foods MAP system extended to 41 days. In the ground beef study, ground chuck was subjected to four packaging treatments: 1) 0.4% CO in a tray with a peelable lid; 2) 0.2% CO in a package with barrier film; 3) 0.3% CO in a package with barrier film; and 4) 0.4% CO in a package with a barrier film. Tests showed that the microbial counts for the different treatments were not significantly different. In addition, the study evaluated the color of the meat using Minolta color scores and a subjective (visual) evaluation. Under the proposed conditions of use, the Minolta scores and subjective evaluation were shown to be acceptable during a shelf life of 27 days under the proposed conditions of use. In regard to the whole muscle cuts, the data showed that after 41 days the approximate total plate count was 10^9 and the typical count for psychrotropic bacteria was up to 10^8 . Thus, the microbial counts were below levels that would be considered indicative of spoilage beyond the 35 days that we previously assessed.

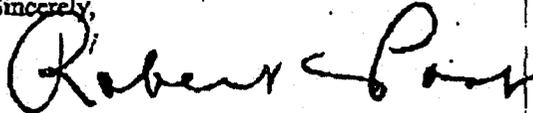
In summary, it is our opinion that the use of the Precept Foods MAP system described in GRAS Notice No. GRN 000143 for use with case-ready fresh cuts of meat and ground meat

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will not mislead consumers into believing that they are purchasing a product that is fresher or of greater value than it actually is or increase the potential for masking spoilage. If you need any additional information regarding this review, do not hesitate to contact Mr. Jeff Canavan, or Mr. Bill Jones at Area Code (202) 205-0279.

Sincerely,



Robert C. Post, Ph.D., Director
Labeling and Consumer Protection Staff

Cc:

Robert C. Post, Director, LCPS
Bobby Palesano, Acting Director, NTS
Jeff Canavan, LCPS
Bill Jones, LCPS
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Mark Wheeler, LCPS
Tawana Duncan, LCPS
Lynn Yoder, LCPS
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