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From: Wagner, Darrell

Sent: Friday, June 13, 2008 1:35 PM

To: Yedinak, Lynne

Subject: RE: Review of Proposed CID for Mayonnaise, Salad Dressings, and Tartar Sauce, A-A-20140D

Hi Lynne:

I have the following comments or suggestions regarding this CID:

Page 4, 6.2.3 Egg ingredients

I have a concern about the language used to report Salmonella, not detected or not isolated. The AMS, Science and Technology Programs, Field Laboratory Services, laboratories will report fee-for-service analysis results for Salmonella as "Negative / 100 grams". As it is currently written in the CID this may create some confusion.

I also have a concern in this section about the statement on the standard plate count limitation of 20,000 per gram. Since there is no mandatory standard for standard plate count regarding egg products produced and inspected according to 9 CFR 590 I have recommended some different language that might be used to limit confusion: ".....and shall be limited to a Standard Plate Count of no greater than 20,000 per gram as reported on a recognized U.S. Department of Agriculture certificate of analysis."

I would like to add to the last sentence in this section that egg products are processed and "continuously inspected" according to 9 CFR 590.

To capture all of the points that I raise I will re-write the section completely with my recommendation below:

6.2.3 Egg ingredients. All egg ingredients shall be reported as Salmonella, not detected , or as Salmonella Negative / 100 grams and shall be limited to a Standard Plate Count of no greater than 20,000 per gram as reported on a recognized U.S. Department of Agriculture certificate of analysis. Egg ingredients shall have been processed and continuously inspected according to the Regulations Governing the Inspection of Eggs and Egg Products (9 CFR 590) as amended.

Thanks for the opportunity to comment.

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