

Mike Harvey

From: Palo, Doug [Doug.Palo@fsis.usda.gov]
Sent: Monday, November 15, 2010 7:59 AM
To: Mike Harvey
Subject: PAA reuse Letter of No Objection.doc



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Office of Policy
and Program
Development

George Washington Carver Center
5601 Sunnyside Ave, STOP 5217
Beltsville, MD 20705-5217

November 15, 2010

Mr. Mike Harvey
Regulatory Manager
EnviroTech
500 Winmoore Way
Modesto, CA 95358

Dear Mr. Harvey:

This is in response your October 28, 2010, email pertaining to EnviroTech's Water Reuse of FCN # 887- [an aqueous mixture of peroxyacetic acid (PAA), hydrogen peroxide, acetic acid, and 1-hydroxyethylidene-1, 1-diphosphonic acid (HEDP) and optionally sulfuric acid] for use in poultry slaughter establishments; and your request for the Food Safety and Inspection Service (FSIS), Risk and Innovations Management Division (RIMD) to issue a "no objection" letter for EnviroTech's Water Reuse of FCN # 887 (FSIS Log Number 10-NT-0648-N-A.)

RIMD reviewed your latest email information and has determined that the Water Reuse of FCN # 887 would not be considered a new technology. The submitted technology is already a recognized technology that is currently permitted to be used in federally inspected establishments.

Every establishment using EnviroTech's Water Reuse of FCN # 887 must take measures as outlined in 9 CFR 416.2(g)(3) to reduce physical, chemical, and microbiological contamination to prevent contamination or adulteration of product. Additionally, the establishments will need to factor into a hazard analysis EnviroTech's Water Reuse of FCN # 887 and if appropriate, incorporated into a Hazard Analysis and Critical Control Point (HACCP) plan or written Standard Operating Procedures for Sanitation (SSOP) or other prerequisite program, validated for its application, and verified on an "on-going" basis for its effectiveness.

Establishments using EnviroTech's Water Reuse of FCN # 887 must demonstrate on-going evidence that pathogens of public health concern, including *E. coli* O157H7 and *Salmonella* are not spread from one carcass to the next as a consequence of the use of EnviroTech's Water Reuse of FCN # 887.

If you have any questions, please contact me at (301) 504-0847 or e-mail Doug.Palo@fsis.usda.gov.

Sincerely,

Doug Palo
Project Manager
Risk and Innovations Management Division