

“Carcasses that are to be air-chilled after treatment” or to “carcasses that are to be treated [with CPC] after chilling (whether air or immersion chilled)” - Health Canada requirements,

and

“When application of the CPC is not followed by immersion in a chiller” - U.S. FDA requirements

Please provide clarification on whether the final language of the Code will include conditions such as the ones stated above for when a potable water rinse would be required in the amended Standard 1.3.3 and the new section in Schedule 18 of the Code. We believe that allowing the immersion chiller to function as a rinse for raw poultry treated with CPC prior to immersion and only requiring a cursory rinse under the conditions stated above (Health Canada and U.S. FDA requirements) will remove an unnecessary step of rinsing treated product prior to immersion in a water chiller.

Regarding the permitted level of CPC of 13.4 mg per kg, which was provided by the Applicant as the worst-case CPC residue value when raw poultry is treated within the use parameters (up to 1% CPC and up to 5 gallons of Cecure[®] solution per bird)¹, we are requesting regulatory permission based on the application parameters instead of the resulting levels of CPC on the product. This is due to the fact that measurement of the residual levels of CPC on the product requires the use of a High-Performance Liquid Chromatography (HPLC) equipment, to which most poultry processing facilities would not have easy access. Since tests submitted in the CPC application have shown that using the Cecure[®] solution at or below the concentration and volume limits above results in compliance with the residue limit of 13.4 mg per kg, we submit that regulation based on the application parameters would be more practical in the processing environment.

We appreciate the opportunity to provide further input in the application for CPC as an antimicrobial processing aid for raw poultry. Please feel free to contact me at Beatrice.Maingi@safefoods.net or 501-758-8500 if there are any questions regarding the information provided above. Thank you for your consideration.

Respectfully,

