DFF

DICKINSON FROZEN FOODS, INC

600 N.W 21st Street • P.O. Box 1010 • Fruitland, Idaho 83619

Phone (208) 452-5200 • FAX (208) 452-5365

May 7, 2003

Chere L. Shorter
Standardization Section
Processed Products Branch
STOP 0247, 1400 Independence Ave, SW
Rm. 0709, South Building
Washington, DC 20250

Dear Ms Shorter:

Dickinson Frozen Foods is one of several manufacturers of IQF frozen onions in the United States. It was brought to our attention approximately three weeks ago, USDA is in the final stages of approving a United States Standard for Grades of Frozen Onions. I have been asked to be the spokesperson for the majority of Northwest processors of frozen onions.

I have been in contact with other major manufacturers of frozen onions, as well as many of the large food companies that use frozen onions as an ingredient in their product. This group includes but is not limited to Heinz, Simplot, General Foods/ Pillsbury, Nestle, Rainsweet, and Appleton Produce. This group of users and manufacturers has one thing in common, they all operate to a quality standard for frozen onions that is substantially higher than the Grade A standard proposed by USDA. With their permission I have included specifications from these companies as well as our own. Given the short time we have known about this specification initiative, we have done our best job to show the very significant quality deviations between the standards currently in use by the industry, and the proposed standards, as we understand them to be.

Consumers and even corporate purchasing agents in smaller food companies rely on the standard designation of USDA Grade A to mean a product is of the highest quality and potentially safe for human consumption. It is our collective opinion, as onion processors, the proposed grade standards would provide a serious degradation in the quality of frozen onions.

We believe under the proposed standards, it is entirely possible to manufacture USDA grade A onions that would contain microbiological pathogens, rot and decay that would make consumers seriously ill, and could be potentially life-threatening.

There are several areas of concern. The most important are as follows:

A. The Grade A standard as proposed by USDA does not require the product be individually quick frozen (IQF). If onions are not IQF it requires the cases or totes to be defrosted slowly using a process called tempering. With case weights

from 45 lbs. to 1,300 lbs. this process may take up to 48 hours. During this period pathogen and plate count often become too high to calculate. Under this standard, block frozen onions could be USDA grade A and that is not acceptable.

B. Storage temperature is left to the discretion of the processor or shipper. Onions require storage at a maximum of 10 degrees Fahrenheit, although many specifications in the United States required -10 degrees Fahrenheit. This is important because microbiological damage from improper storage is not necessarily visible.

C. Strip cut is defined as "stemmed, peeled bulbs which have been cut lengthwise into long narrow pieces of uniform width". This cut is impossible with any mechanical technology available today. It would be extraordinarily difficult and time-consuming for a master chef with a knife. If you cut an onion lengthwise you cut it into wedges. The innermost pedal will be one-third the width of the outer most pedal in a 4-inch onion.

D. The total defect level for critical, and major defects is roughly 20 times greater than the industry standard. Industry standard is four to five units in a 16-ounce sample. The USDA proposed standard would allow about 105 units. There is a difference of opinion about the exact defect level allowance because the measurement criteria is grams instead of units. If the cut is quarter diced the number of defects would be substantially greater than if the cut was three quarter diced. In any event, it appears 10 percent of the product could be defective. This would equate to 4,000 lbs. per truckload.

E. 52.4075—AQL defined—" means the maximum percent of defective units or the maximum number of defects per 100 units" Table I and II use 50 units and 450 grams respectively. This is very confusing.

F. 52.4075—Appearance defined--- the definition for a good appearance and the definition for reasonably good appearance seem to be identical with just the same words reversed.

G. The specification as proposed does not include any microbiological standards. Industry standard is 100,000 aerobic plate count, 100 to 500 total coloform, E coli: less than 10, staphylococcus less than 10, Mold/yeast 500/g. In addition most specifications contain a statement to the effect that the product shall be free of pathogenic or toxic microorganisms at levels that could render the product adulterated or present a risk of growth of microorganisms to levels known to cause food borne illness in humans.

H. We have not commented on diced onion cut sizes or the specifications for tolerances of poor cuts. it appears that most anything is OK, however, no one in any of our Quality assurance departments was able to understand the proposed specification enough to comment.

I. We were unable to find any reference in the proposed specification regarding storage life, chemical residue, or pesticide tolerance in the specification. These areas are generally covered in most specifications for frozen onions.

J. Additional comparative material is contained in attachment A and B. The quality assurance departments of IQF onion processors prepared these documents.

Frozen onions, unlike broccoli and cauliflower, or most other frozen vegetables, are consumed in protein salads, potato salads, and used as a condiment without further heat treatment or any additional microbiological kill step. If frozen onions intentionally or unintentionally contain dangerous pathogenic organisms the USDA designation of grade A provides a false sense of security to the purchaser. If the current standard is adopted it is not only possible but highly likely that USDA Grade A onions will be sold that are toxic and potentially deadly to human beings.

In these difficult times, post 9/11, the safety of the food supply is more important than ever. It is theoretically possible for a toxic biological agent to be introduced to the water supply of a manufacturing plant in Poland or India. Because there are no current designations for standards of microbiology in the proposed standard this product could enter the United States with the coveted USDA Grade A label and be toxic to humans. It is widely believed by many that freezing will kill microbiological contamination, however this is totally false. Many pathogenic organisms will actually grow and multiply and the frozen state although at a substantially reduced rate. The chance of this happening with product produced in the United States is dramatically reduced because of the requirement of microbiological Standards in virtually all industry specifications.

I personally am proud to work in the United States food industry. Most major food corporations in the United States will compete with one another aggressively, and at the same time cooperate with each other in the area of food safety. All of the corporations that we are providing specifications for frozen onions consider their specifications to be proprietary and confidential. Each company listed when asked to provide a copy of their specifications to help the USDA develop standards for frozen onions immediately agreed to help. If we, or for that matter any of our processor or user colleagues can be of further assistance in developing this standard, please let us know.

Sincerely,

Charles B. Murphy
Vice-President