I want to take advantage of your expert skill, if I might, for a moment, and ask you to look at a document which describes the bacteriological condition of a food product. Now it relates to example No. 1 appended to my statement: 18,000 TV dinners that were rejected by DSA and subsequently sold through a commercial channel.

Could you tell us, what the significance of that bacteriological

analysis is or what it would mean to a layman?

(The analysis follows:)

## DEFENSE SUPPLY AGENCY

MARCH 19, 1968.

Memo for Mr. Peter Barash, professional staff member in charge, Special Consumer Inquiry, House Government Operations Committee. Subject: Request for specific information on the DSA/DPSC rejection of

In accordance with your request on the above subject the following informaprecooked frozen meals. tion is an explanation of the bacterial counts as related to the subsistence items in question:

n question :	Lot No.	Standard plate count	Number of samples	Coliform status
Sample No: 20	58	- OK - OK OK OK 2,700,000	8 2 3 8	Do. Do.
18	40 41: 1st sample 2d sample	1,900,000 2,100,000		210 per gram. 180 per gram.

2. For clarification there are three areas of definition that must be understood: a. The maximum standard plate count (SPC) is set at 100,000/gm. If such a count is exceeded the lot does not comply. This explains the rejection of

b. The total coliform count shall not exceed 100/gm. In this case an agar plating technique is used. The agar is selective for the coliform group of bacteria. This agar will support the growth of members of the coliform group. If the total count on the agar plates (five plates) exceeds 100 the lot involved does not comply with the specification. In this case no further "family" distinction need be made. This discussion explains the portion of the reason for rejection of let 41 (the SDC was also high)

the reason for rejection of lot 41 (the SPC was also high).

c. The specification also states that the product shall be negative for E. Coli bacteria. For discussion, we are talking of five agar plates that show a total of more than five typical colonies but less than 100. Assume that the five agar plates showed a total of 10 colonies that had the physical appearance of typical coliform colonies. Four of these typical colonies are lifted from the agar and transferred into a liquid broth and incubated further. The four typical colonies would be transferred into eight tubes. If after incubation the invert tubes show bacterial growth and gas formation in one or more of the tubes, the product is regarded E. Coli positive and therefore not acceptable in accordance with the specification. This type of determination was used on sample 20, lot 55; sample 17, lots 55 and 58; and on sample 18, lots 59

3. In this submission it must be restated that none of the referenced laboratory data is sufficient to declare the product in question as unwholesome. These

bacterial levels are used as indices of production sanitation.

DANIEL A. VARLEY, Congressional Matters Advisor.

Dr. Goddard. It might not mean much to a layman, but I wouldn't want to ingest these products.

Mr. ROSENTHAL. Now, the fact of the matter is that those products: were sold and were presumably consumed.