

Table 23. Number of establishments adopting various interventions				
Item	HACCP Establishment Size Category			Average
	L	S	VS	
Product Volume Weights	0.48	0.48	0.04	
Deli-meat producing stab.	42	311	340	
Mitigation Measure	Number of Establishments			
Establishments adopting PL and GIP	2	20	0	
	Percent			
Establishments	4.8	6.4	0.0	
Product	2.3	3.1	0.0	5.4
Mitigation Measure	Number of Establishments			
Establishments adopting GIP	1	50	0	
	Percent			
Establishments	2.4	16.1	0.0	
Product	1.2	7.7	0.0	8.9
Mitigation Measure	Number of Establishments			
Establishments adopting FCS Testing at a 4-2-1 rate	0	66	260	
	Percent			
Establishments	0.0	21.2	76.5	
Product	0.0	10.2	3.1	13.3

The results in Tables 22 and 23 are used to estimate the possible reduction in listeriosis deaths that may be attributed to actions taken by deli-meat producing establishments as a result of the final rule (Table 24).

This analysis excludes neonate deaths estimated by the FSIS risk assessment because of concerns about using the standard values for a statistical life, which are derived from adult lives. Of course, it is obvious that

averting such neonate losses is a potentially significant benefit. However, excluding these losses does not substantially affect the conclusions of this analysis.

Calculations combining information from Tables 22 and 23 are fairly straightforward: for example, the 13.3 percent increase in adoption rates of sanitation coupled with FCS verification testing translates into 3.1 fewer listeriosis deaths at the median (0.133 from Table 23 times 24 from Table 22); 1.0

fewer at the 5th percentile (0.133 × 8.0); and, 3.1 fewer at the 95th percentile (0.133 × 24). Similar calculations for the other two mitigation measures result in a total reduction of 27.3 at the median; 8.9 at the 5th percentile; and, 31.2 at the 95th percentile. The corresponding reductions in illnesses are 136.7 at the median, 44.6 at the 5th percentile, and 156.0 at the 95th percentile, respectively.

Table 24. Reduction in listeriosis deaths due to various interventions			
Interventions	Averted Deaths		
	Median	5th percentile	95 th percentile
FCS Testing (4-2-1)	3.1	1.0	3.2
GIP	12.0	4.0	14.0
PL & GIP	12.2	3.9	14.0
Total Reduction	27.3	8.9	31.2