



NATIONAL CATTLEMEN'S BEEF ASSOCIATION

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December 19, 2000

FSIS Docket Room
Docket #00-014R2
Room 102 Cotton Annex Building
300 12th Street, SW.
Washington, DC 20250-3700

Re: [Docket No. 00-014R2] Announcement of and Request for Comment Regarding Industry Petition on Hazard Analysis and Critical Control Point (HACCP); Federal Register: October 23, 2000, Volume 65, Number 205, Page 63229-63230

Dear Ms. Moore:

The National Cattlemen's Beef Association (NCBA) respectfully submits these comments in response to the Food Safety and Inspection Service's (FSIS) re-opening of the comment period regarding the Industry Petition on Hazard Analysis and Critical Control Points (HACCP).

Producer-directed and consumer-focused, NCBA is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry.

NCBA commends you for providing this opportunity to the industry to examine the issues affecting our continual efforts to provide consumers with the safest and most wholesome beef supply in the world.

NCBA believes in a farm-to-table approach to producing safe food. Minimization of hazards should begin with sound farm-management and continue through processing, distribution, retail, and consumer handling. When individuals, from the farm to the table, carry out their respective responsibilities to raise, process, transport, handle and prepare foods correctly and safely, any risk to public health is decreased exponentially.

HACCP (Hazard Analysis and Critical Control Points) began an evolutionary process within the meat industry. Its continued evolution should embrace the concept of continuous improvement, with government and industry working together to achieve mutually established goals that work to protect public safety.

AMERICA'S CATTLE INDUSTRY

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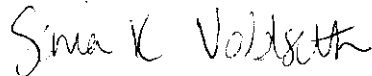
Chicago

Ideally, under HACCP, as the government inspection system changes, the industry is able to change in concert. It is extremely important to maintain the industry's independence in this process. The government's role, in terms of HACCP, should not under any circumstance return to the "command and control" mode. The industry must be allowed to continue the dramatic progress that has been made as the result of their increased role in HACCP, effectively taking more responsibility for food safety.

NCBA will continue to work toward a point where a more collaborative, cooperative relationship exists between government and industry, to ensure sustained improvements in food safety. The groundwork has been laid, along with some substantial and useful construction, but the building of HACCP must continue. NCBA looks forward to working with the agency in the continuing development of HACCP.

We appreciate the opportunity to express our views and further commend the agency for providing this forum for industry to examine these issues and work in partnership with government to provide consumers with the safest and most wholesome beef supply in the world.

Sincerely,

A handwritten signature in cursive script that reads "Sonia K Voldseth".

Sonia K. Voldseth
Associate Director, Food Policy

Cc: Tom Billy