North American
Meat Processors Association

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Martin W. Holmes

September 5, 2001

FSIS Docket Clerk
Docket # 00-026N
Cotton Annex Bldg., Room 102
300 12th Street, SW
Washington, DC 20250-3700

Via Fax (202) 205-0381

RE: Request for Comments on Residue Policy

In addition to joint comments submitted on September 4th, 2001 NAMP would like to make the following points. The North American Meat Processors Association (NAMP), a trade association of processors and distributors of meat, poultry, game, seafood, and allied food products, desires to make the following comments in consideration of the agency's residue policy. We believe it to be in the best interest of both industry and consumers to have knowledge of the producers whose animals are in violation of residue tolerance levels for veterinary drugs and pesticides. We heartily support this initiative. Residues have been a contentious issue with consumers both in the United States and abroad. Unfortunately some of the controversy has been riled without scientific basis and used to promote agendas other than food safety. We believe that disclosure of what residues and by which producers will have a positive effect of diminishing those efforts. Certainly a consolidation of efforts within FSIS, FDA, and EPA to pinpoint and identify abusers will clarify matters.

From a consumer public relations viewpoint the condemnation of entire carcasses should build additional food safety confidence in the safety of our meat and poultry supply. From a NAMP prospective it would address the concerns we raised earlier in our response to the December 2000 Docket 00-34N regarding the Conceptual Framework for Residue Control wherein we were concerned about downstream discovery of residues after slaughter and the lack of responsibility and trace back. Carcass condemnation would accomplish these ends. In taking this approach we also recognize that FSIS is also attempting to put both its and FDA's regulations in sync with each other. This makes absolute sense. In fairness, however, is FDA total condemnation approach correct or should FSIS's policy of organ or tissue condemnation hold sway? Has the scientific community answered this question? If not, it should.

Moreover total condemnation may or may not sit well with disadvantaged nations where protein product is scarce and precious. It may also affect import requirements from foreign sources whose inspection regulations must be compatible with ours, and may exacerbate already strained export relationships with the European Union and others. We hope these points have been considered.

We feel the new approach has definite merit, however, we want to be sure everything has been considered.

Sincerely,

Martin W. Holmes
Executive Vice President

cc: Board of Directors