

# ROSEN MEAT GROUP

Rosen Meat Group  
120 17<sup>th</sup> Ave. West  
Alexandria, MN 56308

December 7, 2001

FSIS Docket Clerk  
Food Safety and Inspection Service  
United States Department of Agriculture  
Room 102 Cotton Annex Building  
300 12<sup>th</sup> Street SW  
Washington D.C. 20250-3700

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00-026N  
00-026N-16  
Greg Benedict

RE: FSIS Docket No.00-026N Residue Policy

To Whom It May Concern:

Rosen Meat Group is comprised of four cow slaughter and fabrication facilities and two further processing plants. We have been in business for almost 30 years dedicated to producing safe and wholesome products. In fact we owe our continual growth to customer satisfaction and quality products. Our cow plants are located in Long Prairie and South St. Paul, Minnesota, Yankton, South Dakota, and Gibbon, Nebraska. We are the largest cow slaughterer in the United States. We appreciate the opportunity to comment on the above captioned notice.

We are concerned about the notice because it abruptly changes policy where there is no apparent risk to the consumer nor does the notice penalized the marketers of animals who knowingly and repeatedly sell animals containing violative residues to slaughter establishments such as ours.

We take several steps to avoid animals with unacceptable levels of residue:

We do not accept non-ambulatory cattle.

We have producers sign and certify that the livestock they are selling us comply with federal regulatory requirements regarding veterinary drug use.

We instruct our buyers not to purchase cattle that show any sign of disease or are suspected of having received drugs within the proper withdrawal period.

If unacceptable levels of residue are found, we issue a letter to the seller of the animal informing them of our findings and issue a warning about future violations.

Following these steps does not mean we will not have animals that would get condemned under this new policy. That means we would suffer the economic loss even though we have done everything in our power to avoid these animals. Why? Because under law the seller would have already been paid well before the test results are known.

It seems to us that to stop these marketing practices of selling animals that contain inappropriate drug residue levels, a true public health approach would concentrate on prevention. This policy could potentially cost us tens of thousands of dollars annually, a cost that shows no appreciable or identifiable benefit to the public.

Sincerely,



Greg Benedict  
President