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~Important Dates~

**49th
Management Conference**
March 2006
The Drake Hotel
Chicago, IL

**64th
Annual Convention**
September 2006
Four Seasons Hualalai
Hawaii



FSIS Docket Clerk
Food Safety and Inspection Service
United States Department of Agriculture
300 12th Street, SW, Room 102, Cotton Annex
Washington, DC 20250

November 17, 2005

Re: FSIS Docket No. 05-031N

To Whom It May Concern:

The North American Meat Processors Association (NAMP) would like to submit the following comments in regards to the Food Safety and Inspection Service (FSIS) Docket No. 05-031N, "National Advisory Committee Meeting on Meat and Poultry Inspection."

NAMP is a trade association representing small and medium sized meat processing companies throughout the United States and Canada. NAMP members pride themselves on producing meat, poultry, and seafood products that adhere to the highest standards of quality and safety. Although I was unable to attend this week's National Advisory Committee on Meat and Poultry Inspection (NACMPI) meeting this week, NAMP is glad to have the opportunity to comment on the agency's interest in moving towards a risk based inspection system.

The concept of risk based inspection makes sense on every level. FSIS is working with limited resources to provide inspection to over 6000 meat and poultry establishments throughout the United States. The establishments vary greatly in the types of product they produce and the processes and technologies that are used to produce these products. There are many factors that can be used to determine where FSIS resources are best spent in order to have the largest impact on human health. The factors can include such things as type of product, antimicrobial interventions being employed, compliance history, seasonal factors, and other factors that are unique to an operation and its employees. It make sense that some plants and processes should require less (more) inspection oversight than others.

NAMP applauds the agency's forward thinking in seeking the comments of NACMPI on establishing a risk based inspection system. Reducing illness from foodborne pathogens on meat and poultry products is a goal that is common to both the industry and FSIS. We hope that FSIS will continue to engage the industry in these discussions and call on the expertise of industry leaders when moving forward with this initiative.

Sincerely,

Ann Rasor
Director of Scientific and Regulatory Affairs