



January 8, 2007

BY FEDERAL EXPRESS

FSIS Docket Room
Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, N.W.
Room 102 Cotton Annex
Washington, DC 20250

**Re: Request to Extend the Comment Period:
Product Labeling: Definition of the Term "Natural"
[Docket No. FSIS 2006-0040]**

Dear Sir or Madam:

The Corn Refiners Association ("CRA") respectfully requests an extension of 60 days, to March 12, 2007, for the comment period on the Food Safety and Inspection Service's ("FSIS" or "the Agency") notice and request for comments for the definition of the term "natural" in meat and poultry product labeling.

CRA is the national trade association representing the corn refining industry in the United States. CRA and its predecessors have served this important segment of American agribusiness since 1913. Corn refiners manufacture sweeteners, ethanol, starch, bioproducts, corn oil, and feed products from corn components such as starch, oil, protein, and fiber. Corn sweeteners, including corn syrups, dextrose, high fructose corn syrup and crystalline fructose, are the most important category of refined corn products. Many refined corn products are used as ingredients in meat and poultry products.

An extension of at least 60 days is needed to provide CRA and its membership adequate time to submit a meaningful and thorough response to FSIS's request for comments. FSIS provided unusually short notice of both the public meeting, held on December 12, 2006, and request for comments. The Agency provided only one week's notice to prepare oral comments

FSIS Docket Room
January 8, 2007
Page 2

for the public meeting and 37 days to submit written comments.¹ The comment period, which is currently scheduled to close on January 11, 2007, also encompassed the Christmas and New Year's holidays. This condensed time period does not allow adequate time to formulate and develop meaningful written comments and supporting data with respect to the meaning of the term "natural" for meat and poultry products.

An extension of the comment period is also justified by the complexity of the issues pertinent to natural labeling. The USDA regulatory regime for "natural" claims must be carefully evaluated for its impact on the food industry and consumers. An extended comment period is necessary to provide interested parties a full opportunity to address the important questions identified in the USDA notice and raised at the December 12 public meeting. With sufficient time to address these issues, comments by CRA and other stakeholders will provide a stronger record to inform FSIS's rulemaking.

There is no urgent public health or other reason for rushing consideration of the complex issues surrounding natural labeling. The Agency's policy on "natural" claims has been in place for many years. This is the first formal public opportunity for stakeholders to provide their views regarding the appropriate meaning of "natural" for meat and poultry products. An open, transparent and deliberate process is necessary to afford stakeholders an opportunity to provide the best possible comments and information on this important issue.

For the above reasons, CRA respectfully requests that FSIS extend the comment period at least 60 days on the meaning of the term "natural" in meat and poultry product labeling.

Respectfully submitted,



Audrae Erickson
President

¹ 71 Fed. Reg. 70503 (December 5, 2006).