

# National Meat Association

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April 4, 2007

FSIS Docket Room  
FSIS Docket Clerk  
Docket No. FSIS-2006-0045  
U.S. Department of Agriculture (USDA), FSIS  
300 12<sup>th</sup> Street, SW., Room 102  
Cotton Annex Building  
Washington, DC 20250

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FSIS DOCKET ROOM  
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Re: Docket No. FSIS-2006-0045  
*Federal Register* Monday, March 5, 2007  
Vol.72, No.42  
Pages 9651-9652

Gentlemen:

On behalf of the National Meat Association (NMA) members, we respectfully submit the following comments in response to the *Federal Register* Final Rule entitled, "Uniform Compliance Date for Food Labeling Regulations."

Organized in 1946, NMA represents the interests of meat packers and processors throughout the United States. With approximately 300 general member companies, all of which deal with labeling of product, NMA has a great interest in this *Federal Register* final rule.

NMA applauds FSIS efforts to establish uniform compliance dates for labeling. By establishing uniform compliance dates, companies will not have to fret over each individual labeling requirement that requires compliance. There are multiple benefits for uniform compliance dates for labeling requirements, which aid industry as well as consumers.

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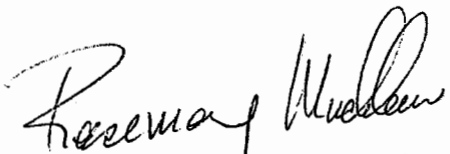
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Though there are many advantages to the uniform compliance dates, many questions arise with this final rule. No reference is made as to what type of requirements will be placed on labeling in the future. For example, "natural" labeling claims entered a period of change. What other types of labeling changes can be expected from the Agency?


Furthermore, NMA would not like to see the industry blindsided by labeling requirements that may be added prior to a uniform compliance date. The Agency should incorporate full disclosure with regards to future plans for labeling requirements. If future plans cannot be delineated in full, then a possible suggestion would be guidance as to the parameters of future labeling requirements. It is especially important that FSIS not surprise the industry with labeling requirements immediately prior to uniform compliance dates.

We thank you for this opportunity to comment on the *Federal Register* Final Rule, "Uniform Compliance Date for Food Labeling Regulations." We hope you will take our comments into consideration.

Sincerely,

  
Rosemary Mucklow  
Director Emeritus

  
Ken Mastracchio  
Associate Director

  
Satbir Bal  
Regulatory Analyst