## LM WORKING GROUP

2000 CORPORATE RIDGE TELEPHONE: (703) 821-0770



MCLEAN VIRGINIA FACSIMILE: (703) 821-1350

March 16, 2001

Docket Clerk FSIS Docket #97-013P U.S. Department of Agriculture Food Safety and Inspection Service Room 102, Cotton Annex, 300 12 St., SW. Washington, DC 20250-3700.

97-013P-11 97-013P Wendy Lochner

RE: Performance Standards for the Production of Processed Meat and Poultry Products, Proposed Rule (Docket No. 97-013P), Request to Extend Comment Period.

The Listeria monocytogenes (LM) Working Group is a coalition of trade associations and companies representing the food industry. Since 1994, the LM Working Group has advocated, in cooperation with the Federal government, processes of responsible and appropriate policy concerning the regulation of LM in domestic and international trade.

The recently proposed performance standards for the production of processed meat and poultry products will have a major impact on the food industry, specifically processors. A considerable amount of time will be needed to review, analyze and constructively respond to the February 27, 2001 *Federal Register* notice. In particular, compiling available scientific data to assess the potential effects and viability of the proposed requirements and, if necessary, generating additional research will take a substantial amount of time.

Unfortunately, a 60-day comment period does not permit time for the food industry to respond in a substantive manner. The LM Working Group, there fore, requests FSIS to extend the comment period on the *Performance Standards for the Production of Processed Meat and Poultry Products, Proposed Rule (FSIS Docket No.97-013P)* for 120 days until September 26, 2001.

The LM Working Group looks forward to working with the agenty on this issue and offers any assistance that we may provide.

Sincerely,

American Frozen Foods Institute
Food Marketing Institute
Grocery Manufacturers of America
Kraft Foods, Incorporated
National Fisheries Institute
National Food Processors Association
National Milk Producers Federation
National Turkey Federation
The Pillsbury Company
Snack Food Association
United Fresh Fruits and Vegetables