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May 22, 2001

U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102
Cotton Annex
300 12 Street, SW
Washington, DC 20250

97-013P-2657
97-013P
James A. McCarthy

Re: Docket No. 97-013P; Performance Standards for the Production of Processed Meat and Poultry Products (66 FR 12590, February 27, 2001) – Request for Extension of Comment Period

Dear Sir or Madam:

On behalf of the Snack Food Association, I am writing to request a 60-day extension of the comment period on the United States Department of Agriculture's (the Department) proposed rule -- Performance Standards for the Production of Processed Meat and Poultry Products -- published in the *Federal Register* on February 27, 2001.

The Snack Food Association (SFA) is an international trade association representing approximately 800 snack manufacturers and suppliers to the snack industry. Snacks produced and sold by SFA members include potato chips, tortilla chips, corn chips, crackers, pretzels, popcorn, extruded snacks, meat snacks, pork rinds, snack nuts, party mix and other savory snacks. Retail sales of snack foods in the United States total more than \$30 billion.

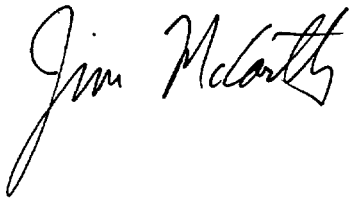
SFA has been closely monitoring the agency's work on the Listeria proposed rule for the last several years. We have anticipated that this rule would have a significant impact on the meat snack industry because of the attendant cost of compliance.

The Snack Food Association intends to provide the department with detailed information on the economic impact of the rule and scientific data demonstrating that Listeria does not survive on meat snacks. A considerable amount of time is needed to collect, review, analyze and constructively respond to the proposed rule. Moreover, as a trade association for the meat snack industry, we must provide our members with an adequate amount of time to review and approve of our final comments. This clearance process, alone, is very lengthy.

While we appreciate the 30-day extension the Department granted in April for the proposed rule, we find it is inadequate to respond in a substantive manner that will be truly meaningful to the Department in its deliberations. We believe an extension of 60 days to the June 28, 2001 comment deadline would allow enough time to compile data to assess the potential effects and viability of the proposed rule and obtain the necessary clearance from our member companies. Additionally, a 60-day extension would also allow the comment period for the Listeria risk assessment to close, before we are required to finalize our comments relative to the performance standards.

SFA looks forward to working with the Department on this issue.

Sincerely,

A handwritten signature in black ink that reads "Jim McCarthy". The signature is written in a cursive, slightly slanted style.

James A. McCarthy
President and CEO