



**NATIONAL MEAT ASSOCIATION®**

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January 14, 2000

Philip Derfler, Deputy Administrator  
Office of Policy, Program Development and Evaluation  
Food Safety & Inspection Service  
Washington, DC 20250-3700

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Rosemary  
Mucklow

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Dear Mr. Derfler:

We have reviewed the January 4, 2000 *Federal Register* **Notice Interim final Interpretative Rule with an Opportunity for Comment** and we would appreciate your clarification of the following points. Your early response would be appreciated so that we may make comments for the record by February 3, 2000 as provided in the Notice.

The principle used for many years, indeed for decades, in defining whether products are “properly labeled” and thereby free to move in commerce independently has been interpreted to include such items as the following:

An unwrapped forequarter or a hindquarter of beef, so long as it bears a legible mark of inspection.

An unwrapped lamb or hog, either whole or whole sides, so long as they bear a legible mark of inspection.

Primal and/or subprimal cuts of beef, lamb or pork, in a vacuum sealed package where either the mark of inspection on the meat is legible and visible, or the vacuum bag is imprinted with the mark of inspection, or the clip that seals the bag is imprinted with the inspection number.

Ground meat in vacuum-sealed packages with the mark of inspection on the bag and a product name, and other required labeling features on the bag.

Please advise me whether these are the types of products that you expect to define as “pass through” with respect to the Interim Final Notice and therefore they will not be included in the dollar volume of the retailer in meeting the Retail Exemption requirements so long as the retailer does not alter their characteristics in any manner.

Again, your early clarification would be appreciated.

Sincerely,

Rosemary Mucklow  
Executive Director

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