

**TESTIMONY**  
**of**  
**MS. DANIELLE LACHMAN**  
**DIVISIONAL MERCHANDISE MANAGER**  
**TARGET CORPORATION**  
**Before the**  
**SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS OF THE**  
**COMMITTEE ON ENERGY AND COMMERCE**

March 12, 2008

Chairman Stupak, ranking Member Shimkus and other Members of the Subcommittee, Good morning. My name is Danielle Lachman. I am pleased to be here today on behalf of Target Corporation.

I am currently a Divisional Merchandise Manager for Target's SuperTarget grocery store operations. I have been in my current position since September 2007 and with Target since 2003. As a Divisional Merchandise Manager for SuperTarget, I oversee the produce, meat, deli and bakery departments. The merchant teams in these departments assess available products, select and buy the right assortment of products, and develop a Target-brand presentation for our guests in the store.

**Interaction with the Oversight and Investigation Subcommittee and FSIS**

The Subcommittee has invited me here to relate Target's recent interactions on labeling with the Food Safety and Inspection Service ("FSIS") of the U.S. Department of Agriculture ("USDA") as well as with suppliers of certain of Target's fresh meat products.

On September 13, 2007, Target received a request letter from Chairmen Dingell and Stupak seeking information regarding fresh meat products and methods employed to ensure freshness. In particular, the Subcommittee sought information regarding the modified atmosphere packaging ("MAP") used by some of Target's fresh meat suppliers.

Target responded to all of the Subcommittee's questions by letter dated October 4, 2007. Target also provided documentation as requested.

In addition, on November 9, 2007, in an effort to fully address the Subcommittee's concerns regarding the labeling of products employing MAP technology, Target wrote to the Administrator of FSIS seeking direction regarding how to obtain approval for additional labeling on meat products using MAP.

FSIS responded to Target on January 16, 2008. In its response, FSIS indicated that it was not possible for FSIS to provide direction to Target or approval of the proposed labeling language without additional information and documentation. Much of that documentation and information is not in the possession or control of Target as a retailer. Target has had no further contact with FSIS.

## **Interaction with Suppliers**

In addition to working with the Subcommittee, and contacting FSIS, Target has also reached out to its suppliers. After receiving the FSIS letter of January 16, 2008, Target asked its primary provider, Precept (a joint venture between Cargill and Hormel), if it would include the language in Target's letter to FSIS on its packaging. Precept informed Target that it had already submitted an application with different language to FSIS which had been approved by FSIS.

Target understands that Precept will begin employing the FSIS-approved labeling as early as the end of March. We understand that the new packaging will include the following language, "Color is not an accurate indicator of freshness. Refer to Use or Freeze By [date]."

In addition, Target understands that Precept and Hormel have been actively working with a consumer group to develop additional labeling language. We understand the joint effort is aimed at ensuring that this consumer group is supportive of any additional labeling regarding the use of MAP technology.

## **Conclusion**

The fresh meat products sold at SuperTarget comply with all applicable labeling standards. Target is committed to ensuring that all food products sold at SuperTarget will comply with any new labeling requirements as well. We will only buy from suppliers that provide assurances that they will comply with all applicable laws and standards.

Thank you for the opportunity to discuss these issues with you. I would be pleased to answer any of your questions.