**NATIONAL CATTLEMEN'S BEEF ASSOCIATION**

1301 Pennsylvania Ave., N.W. • Suite 300 • Washington, DC 20004-1701
Phone 202-347-0228 • Fax 202-638-0607 • Web Site www.beef.org • E-mail cattle@beef.org

To: FSIS Docket Clerk
Room 102
Cotton Annex Building
300 12th Street SW
Washington, DC 20250-3700

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From: Gary M. Weber, Executive Director, Regulatory Affairs

Date: December 10, 2001

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00-026N-33
Gary M. Weber

**RE: Residue Policy Docket No. 00-026R**

On behalf of the National Cattlemen's Beef Association I want to thank the Food Safety and Inspection Service (FSIS) for reopening the comment period regarding the agency's antibiotic residue policy.

We recognize the need to ensure that FSIS policies, practices and enforcement are consistent with Food and Drug Administration (FDA) regulations. For this reason, for the most part we agree with the FSIS proposal to harmonize the residue policy with the FDA target marker/tissue policy.

In discussions with FSIS, FDA and other experts, it has become clear that while the FDA and the pharmaceutical companies have established marker tissue residue levels specifically relating to the liver and kidney, it is also clear that the acceptable residue levels in these tissues are directly correlated with acceptable levels of residue in beef muscle. Therefore, it is our understanding that the FDA has established safe levels of antibiotic levels of residue in beef muscle. The target tissue levels are directly correlated with safe levels in beef muscle.

The fact that for all FDA approved antibiotics there is implicitly a safe residue limit for beef indicates that FSIS may indeed be able to develop and use beef muscle testing to verify compliance with FDA residue levels. We encourage FSIS to discuss this issue with FDA and identify the actual approved or safe levels of antibiotic residue in beef, which can be used to verify compliance with FDA residue limits.

It is important that the FSIS develop beef muscle residue testing methods because, for instance, the European Union is requiring testing of beef to verify it is violative residue free as part of our evolving requirements for access to the European beef market. In addition, we believe that imported beef should be subjected to a limited amount of residue testing to verify that the exporting country's claims that the beef they export to the US is free of violative residues.

In summary, we believe the FSIS needs to continue development of beef residue testing systems in addition to utilizing the marker/tissue residue testing policy.

We would be glad to meet with FSIS to discuss this issue in more detail.

Cc: Phil Derfler
Deputy Administrator, Policy and Program Development, FSIS