

L.L. Parks Livestock, Inc.



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August 17, 2001

FSIS Docket Clerk
Docket # 00-026N
Room 102, Cotton Annex Building
300 12th Street, SW
Washington, DC 20250-3700

00-026N
00-026N-8
Lawrence Parks

RE: RESIDUE POLICY

L.L. Parks Livestock, Inc., a cull swine marketing company for 25 years, fully supports the FSIS's efforts to insure this nation a safe and wholesome food supply. Our role has been to provide the collection, precise sort, and orderly transfer of live animals from the production side of the swine industry to the slaughter/processor side. While we willingly accept responsibility to maintain clean and sanitary facilities to conduct this business, and take every precaution to maintain a healthy animal fit for slaughter, we firmly believe accountability for violative residue levels belongs to those conducting the feeding and medication during the production cycle.

The critical component for a successful residue prevention program is the ability to trace an animal back to the source of the violation. To that end, our company adheres to the Federal policies and procedures set forth for the marketing industry to provide source identification of slaughter animals. The fact is that the current methods prescribed for swine identification back to the farm are not reliable enough to insure that the true violators will be correctly identified. The problem lies with the specie itself. While backtags installed with glue have proved successful in the cattle industry, the retention rate at slaughter, and even at assembly, has proven to be less than desirable when applied to swine.

Our comments on the proposed residue policy do not take issue with the harmonizing of FSIS procedures with the FDA, but rather with the unreliability of current methods of swine identification. Our concern is we will be held accountable for the actions of others when the trail stops at our door due to missing or non-readable backtags at slaughter.

As FSIS has acknowledged, this proposed policy would change purchasing practices in our industry. As a marketer who handled over 900,000 cull animals last year, I am afraid the economic impact as a result of these changes will not hit the target it was intended for.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lawrence Parks', written over a horizontal line.

Lawrence Parks, President
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