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FSIS Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102
Cotton Annex Building
300 12th Street
Washington, DC 20250

00-043N
00-043N-4
American Association of Meat Processors
American Meat Institute
Animal Health Institute
National Meat Association

RE: Docket No. 00-43N

To Whom It May Concern:

The undersigned organizations wish to make the following points for inclusion in the discussion materials for the December 11, 2000, public meeting on residue control. Discussion point two (2) under the section titled "Practical Considerations" in the November 28, 2000, *Federal Register* notice indicates that the United States Department of Agriculture is not contemplating changing the involvement or coordination of the several federal agencies that can help address the residue control problem.

Within USDA, there are three agencies -- FSIS, APHIS, and GIPSA -- that can significantly assist in solving the residue issue. The lack of coordination among these agencies, however, has prevented the effective resolution of the cull cattle residue problem.

If, through scientifically credible evidence, chemical residues in livestock present a significant public health problem, then the federal government should coordinate its efforts to help resolve the problem, much as President Clinton did for *Listeria* control. Yet, the thrust of the current control efforts remains focused slaughter/processing plants through HACCP regulations as, essentially, the only means for improved residue control.

If the final pockets of residue abuse in the livestock population are to be successfully addressed, government agencies, both with direct and indirect capabilities to help resolve this issue, must work together in a more coordinated and goal-oriented manner. Identification of the slaughter/processing plant as the

responsible party through the HACCP regulations, however, is not the complete answer. In that regard, better methods of animal identification back to the violating producer, recordkeeping, and enhanced enforcement strategies at those levels are also necessary to achieve the ultimate goal.

Thank you for this opportunity to submit these views in advance of the December 11 meeting. We look forward to working with FSIS regarding this issue.

Sincerely,

American Association of Meat Processors
American Meat Institute
Animal Health Institute
National Meat Association

cc: John Adams
Gary Weber