



North Carolina
 Department of Agriculture
 and Consumer Services
 Veterinary Division
 August 31, 2001

RECEIVED
 01 SEP 10 PM 11:00

Meg Scott Phipps
 Commissioner

Weldon B. Denny
 Chief Deputy Commissioner

David T. Marshall, DVM
 State Veterinarian
 Assistant Commissioner
 of Animal Industry

①

FSIS Docket Clerk
 Docket #00-26N
 Room 102, Cotton Annex Bldg.
 300 12th Street, SW
 Washington, DC 20250-3700

00-051N
 00-051N-1
 David T. Marshall

Comment: Docket No. 00-051N

The North Carolina Department of Agriculture and Consumer Services (NCD&CS) wishes to provide the following comments on Docket No. 00-051N, Residue Testing Procedures.

The NCD&CS supports any reasonable and enforceable effort towards safeguarding the food supply for consumers. To this end, it has administered one of the largest and most successful state meat inspection programs, the largest Talmadge-Aiken program in the nation, and actively participated in the FSIS residue-monitoring program. In addition, the Field Forces section of our Veterinary Division participates daily in animal identification and traceback issues involving diseases that affect the overall animal health and safety of the domestic meat supply.

While we laud efforts to strengthen the residue-monitoring program, we do have concerns with the infrastructure and resources available to support the proposed policy in a fair and equitable manner in the absence of uniform national quality assurance and animal identification programs. Of particular concern is the public posting of residue violators who may not be guilty of the infraction but are victims of an inability to trace back to the actual violator because of missing or insufficient animal identification.

Of particular concern are the public livestock markets, which assemble animals from a variety of sources and act as a transfer agent from the production side of the industry to the slaughter processor side. Current policy utilizes the glued-on backtags for identification purposes, a system with inherent problems due to lack of retention. In addition, many buyers, dealers, and haulers intentionally remove backtags in an effort to reduce traceability and improve marketability of these animals.

As currently proposed, many violations will be traced back to the market, with no ability to identify the actual producer who may have committed the violation.



FSIS Docket Clerk
August 31, 2001
Page 2

The NCD&CS requests that the USDA-FSIS evaluate the role livestock markets play in the marketing chain, and provide the investigative resources necessary to insure that only the actual violator is incriminated. We request the development and implementation of a national animal identification program to facilitate rapid traceback for animal disease and food safety issues. We request that the USDA work closely with the United States Animal Health Association in the development of a uniform, consistent quality assurance and food safety certification program. Additionally, we request accountability from those involved in the production of food, from the "farm to the fork", with the continued development of programs and measures to achieve such goals.

Sincerely,

A handwritten signature in black ink that reads "D. T. Marshall". The signature is written in a cursive, flowing style.

David T. Marshall, D.V.M.
State Veterinarian

DTM/dw