

Regulatory Compliance
Helping Industries Comply With The Law

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January 18, 2004

Dr. Perfecto Santiago
FSIS DOCKET Room
U.S. Department of Agriculture
Food Safety & Inspection Service
Room 102 Cotton Annex
Washington, DC 20250-3700

Dear Dr. Santiago:

The following is to comment on the Federal Register Notice of August 4, 2003 and pertaining to the Safety & Security Guidelines.

In recent month, the U.S. Department of Transportation and the U.S. Coast Guard have put forth similar security regulations for facilities under their jurisdiction. We have been involved in assisting the local industries in the implementation of the same and they have proven to be very useful to the applicable industrial sectors. Industrywide, the importance of these regulations for the protection of commerce is well understood and accepted.

Our comments propose that these guidelines should become mandatory instead of voluntary. The industrial community tends to believe that voluntary standards are not as important as mandatory standards therefore one tends to ignore them since they pose no risk of enforcement action.

The Department of Homeland Security and the agencies under their control have implemented mandatory security regulations for all aspects of industrial operations including, but not limited to, air transportation, maritime transportation, hazardous materials, public safety, etc. We believe that if these guidelines are not made mandatory it will certainly leave the food industry vulnerable to attacks which would be in contrary, to the purpose of the Bioterrorism Act.

Considering that a security system is only as strong as its weakest component, these guidelines should be mandatory in order to close the security loop and have all vulnerable areas covered and secured. These security programs and procedures have presented no major problems in their implementation and are relatively inexpensive for industries to implement and comply with.

If you would have any questions of points of discussion please don't hesitate to contact us at the below address, phone, and/or Email.

Sincerely,



Raymond B. Huddleston
QA Manager
Regulatory Compliance