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June 28, 2004

Docket Clerk  
Food Safety and Inspection Service  
U. S. Department of Agriculture  
300 12<sup>th</sup> Street, SW  
Room 102, Cotton Annex  
Washington, D.C. 20250

Re: Docket No. 03-026P; Uniform Compliance Date for Food Labeling Regulations

These comments are submitted on behalf of the National Turkey Federation (NTF) in response to the Food Safety and Inspection Service's (FSIS) proposed rule to establish January 1, 2008 as the uniform compliance date for new food labeling regulations that are issued between January 1, 2005 and December 31, 2006. NTF represents nearly 100 percent of the U.S. turkey industry, including processors, growers, breeders, hatchery owners, and allied industry. It is the only national trade association representing the turkey industry exclusively.

We agree with FSIS that a uniform compliance date for food labeling regulations published within a two-year period is an efficient and convenient way to regulate the labeling of products. Current practices are such that a manufacturer could be required to change their labels several times within a year or two to respond separately to each new regulation. This proposal would streamline the process and save money for both manufacturers and consumer.

First and foremost, use of a uniform date permits manufacturers to adjust to new labeling requirements in an orderly and economical fashion by allowing sufficient lead time to develop new labeling and exhaust existing labeling inventory. Secondly, use of a uniform effective date will also be in the best interests of consumers because it avoids the costs associated with multiple short-term label revisions that would likely be passed on to the consumers. Finally, we believe it would benefit the agency by providing a sufficient transition time to resolve any issue of implementation (which, of course, would also benefit industry).

For the reasons discussed above, we support the proposed rule establishing a uniform compliance date for food labeling regulations published between January 1, 2005 and December 31, 2006.

Respectfully submitted,

Handwritten signature of Brie C. Wilson in black ink.

Brie C. Wilson  
Manager, Government Affairs

