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July 1, 2004

FSIS Docket Clerk  
Department of Agriculture  
Food Safety and Inspection Service  
Room 102 Cotton Annex Building  
300 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20250-3700

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

Dear Sir or Madam:

These comments are submitted regarding the above-referenced proposed rule published in the May 4, 2004, *Federal Register*. In that proposed rule, the Food Safety and Inspection Service (FSIS or the agency) invited comments on the establishment of January 1, 2008, as the uniform compliance date for new food labeling regulations issued between January 1, 2005, and December 31, 2006. The American Meat Institute\* (AMI or the Institute) applauds the agency's proposal to harmonize its approach to labeling regulations with that of the Department of Health and Human Services, Food and Drug Administration (FDA).

According to the proposal, the agency has determined that "coordinating the effective dates of its labeling changes and FDA's labeling changes will minimize the economic impact of those changes on the industry." The Institute agrees with this determination. Further, AMI concurs that setting uniform compliance dates in two-year increments will enhance the meat and poultry industry's ability to plan for implementing new labeling requirements. Companies will be better equipped to deplete existing inventories prior to developing new labels, thus, minimizing added costs to consumers resulting from wasted inventory. Establishing a uniform compliance date that is the same as FDA's, provides the meat and poultry industry

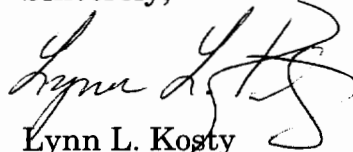
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\* AMI is the nation's oldest and largest trade association representing packers and processors of beef, pork, lamb, veal, turkey, and processed meat products in the U.S. Our member companies produce more than 90 percent of meat products available in the U.S.

with a greater ability to adjust production plans to new labeling requirements across all product lines, regardless of whether they are regulated by FDA or FSIS.

AMI appreciates the opportunity to comment on the proposal. If you have any questions about these comments or would like to discuss anything contained herein, please contact me.

Sincerely,



Lynn L. Kosty  
Director Regulatory Affairs

cc: J. Patrick Boyle  
Mark Dopp