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September 15, 2005

Docket Clerk, Docket No. 05-019N
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250

05-019N 05-019N-2 Andrea H. Warfield

**RE: Docket No. 05-019N
Notice of Request for a New Information Collection (Voluntary Recalls of Meat and Poultry Products)**

The American Association of Meat Processors (AAMP) is pleased to submit the following comments on the Notice of Request for a New Information Collection (Voluntary Recalls of Meat and Poultry Products).

The Association is an international organization whose members include meat and poultry processors, slaughterers, caterers, home food service companies, wholesalers, retailers, suppliers, and consultants to the meat and poultry industry. There are 33 state, regional, and provincial associations of meat processors that are also affiliated with AAMP. Majority of our members are small and very small businesses, most of them family-owned and operated.

AAMP agrees with the idea of providing an extra space to include, if necessary, an explanation of why the amount of product received by a retail consignee cannot be determined. However, we feel that including this information should be voluntary for processors. Plants do not always have clear-cut evidence as to where product actually went or the reasons for being unable to collect the information. Many plants may give answers like "product was consumed, discarded, etc." if they are unable to determine why the amount of product received is elusive. These types of answers do not seem to aid in the recall process, and the information would in a sense be useless. During times like these, tracking this information more closely would be a burden to plants. Requiring them to take valuable time and resources and spend them chasing down product will not improve food safety. The better solution would be for the inspector and the plant to work together to solve the problem, making the information tracking process easier should an incident occur again.

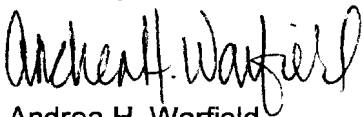
It should be adequate to have the names of the distributors and retailers where a plant's product was shipped, but once product filters down the supply chain, it should not be necessary to follow a paper trail to determine specifically how much product went where. FSIS should be responsible for tracking this information should it be pertinent to food safety. The information currently being provided to the Agency is appropriate, and the additional information should be

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voluntary for plants to provide should they have it. The idea is to improve the future of information collection, not make the process more frustrating for plants. Utilizing a variety of collection techniques will also give plants options as to how they can most effectively submit the information. These options assist in making the collection and submission process less of a burden.

AAMP appreciates the chance to comment on the Notice of Request for a New Information Collection (Voluntary Recalls of Meat and Poultry Products). Incorporating an extra space on the form to provide plants with the opportunity to explain why the amount of product received by a retail consignee cannot be determined is a good idea, but do not make this space a required field.

Sincerely,



Andrea H. Warfield

Director of Legislative and Regulatory Affairs

cc: Mark Schad, AAMP President