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Joan Claybrook, President

16

November 14, 2000

FSIS Docket Clerk  
Docket #99-029P  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
Room 102, Cotton Annex  
300 12<sup>th</sup> Street, S.W.  
Washington, DC 20250-3700

99-029P  
99-029P-16  
Wenonah Hauter  
Felicia Nestor

Dear Docket Clerk:

The following represents the comments from Public Citizen and the Government Accountability Project regarding proposed rules on the sharing of information with states when food recalls are undertaken. Public Citizen is a consumer organization founded by Ralph Nader in 1971 and represents 160,000 members. The Government Accountability Project (GAP) represents government and corporate whistleblowers. GAP has been working closely with hundreds of federal food inspectors over the past several years.

It is our position that when food recalls are conducted, they should be executed and completed in the shortest possible time frame to protect the public's health, welfare and safety. Information concerning the distribution of contaminated food should be shared with the appropriate state authorities that could assist in the identification, location and the retrieval of the food subject to the recall. While we are cognizant of the need to protect any trade secret information that might be involved in such recalls, and precautions can be taken to ensure that is preserved, the public's interests would be well-served by having as many responsible federal, state and local authorities involved to assist with a potentially harmful situation.

FSIS should work with each state to develop the list of authorities that should receive recall information. We would hope that state governments would avail themselves to this information, and that the state governments would identify the full breadth of authorities that could be helpful in the recall process. For example, in addition to the state's health department, we would see the need to share this information directly with agencies that run state-operated institutions (prisons, hospitals, universities, schools) should these

Ralph Nader, Founder

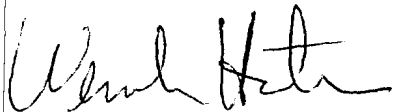
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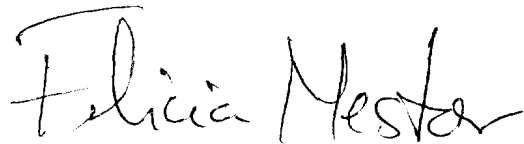
institutions be potential locations of contaminated food. By identifying multiple authorities to assist in the recall process, states would ensure that the recall was conducted in an efficient manner.

This is an important health and safety issue. Information-sharing with the states is logical and should be implemented as quickly as possible.

Sincerely,



Wenonah Hauter, Director  
Critical Mass Energy and Environment Program



Felicia Nestor, Director  
Food Safety Program  
Government Accountability Project