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QUALITY MEAT COMPANY, INC.

340 North Avenue
Grand Junction, Colorado 81501

January 29, 2000

Food Safety and Inspection Service

99-055R-2
99-055R
Joyce Emerson

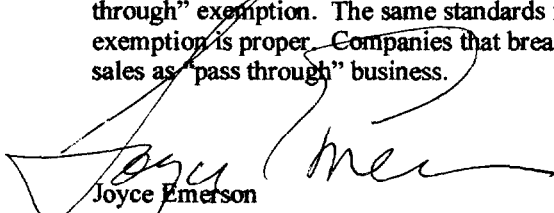
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Subject: Exemption of Retail Operations from Inspection requirements

The following are my comments on the subject proposed interim final rule published January 4 in the Federal Register.

I continue to think that the American public is being fooled that meat processing is under federal inspection when the largest percentage of what the consumer eats comes from retail stores which do not have to follow processing rules and meet requirements of inspected establishments. I have been told that HACCP will allow inspectors to be freed from current inspection duties and be available to inspect grocery stores. The proposed rule seems designed to minimize the number of retail establishments to be inspected. This is not the direction Food Safety and Inspection Service should take.

The "pass-through" basis for exemption is being used by some companies supplying HRI establishments to avoid inspection even though a significant part of their business includes processing multiple raw meat products. At a minimum, there needs to be thorough review of sales records prior to granting a "pass-through" exemption. The same standards for defining processing should be applied in determining if the exemption is proper. Companies that break cases and re-label product should not be able to consider these sales as "pass through" business.


Joyce Emerson
President

P.S. If "receiving" and
"storage" are subject to
HACCP for meat companies,
then these "pass-thru"
companies need HACCP plans.
Let's keep the playing field level!