

January 22, 2010

Via Messenger

Mr. Alfred V. Almanza
Administrator
Food Safety and Inspection Service
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Room 331-E
Washington DC 20250

Re: Request for Extension of Comment Period for Supplemental Proposed Rule on Nutrition Labeling of Single-Ingredient Products and Ground or Chopped Meat and Poultry Products (Docket No. FSIS-2005-0018)

Dear Mr. Almanza,

The purpose of this letter is to request that the Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) grant a 60-day extension of the comment period for FSIS's supplemental proposed rule on nutrition labeling of ground and single ingredient meat and poultry products. 74 Fed. Reg. 67736 (Dec. 18, 2009). In order to respond fully to the supplemental proposal, including the Department's several requests for information, the signatories to this letter (see Addendum A) intend to conduct research, gather information from our memberships, and analyze the results and responses.

Our associations represent a substantial portion of the meat and poultry production and food wholesale and retail communities. Our associations and our members have been and remain committed to participating fully in this rulemaking. Nonetheless, the 60-day comment period provided for in the supplemental proposal included some of the heaviest commercial activity for our members. Although we have already begun collecting information from our members, it has become apparent that we will not be able to respond fully by February 16, 2010. Accordingly, given the importance of the proposed rule, we respectfully request that you grant an extension of the comment period so that we and other interested parties will have a meaningful opportunity to comment.

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We appreciate your consideration of our request. Please direct your response to Deborah White, Senior Vice President and Chief Legal Officer, Food Marketing Institute, 2345 Crystal Drive, Suite 800, Arlington, VA 22202 or email dwhite@fmi.org.

Sincerely,

American Meat Institute
Food Marketing Institute
National Cattlemen's Beef Association
National Chicken Council
National Grocers Association
National Turkey Federation

cc: Ms. Sally Jones
Labeling and Program Delivery Division
Office of Policy and Program Development
Food Safety & Inspection Service
US Department of Agriculture
Beltsville, MD 20705

FSIS Docket Clerk
Room 2-217
Food Safety and Inspection Service
US Department of Agriculture
5601 Sunnyside Avenue
Mail Stop 5474
Beltsville, MD 20705-5474

Addendum A

The American Meat Institute (AMI) is the national organization representing the interests of meat and poultry slaughterers and processors and their suppliers throughout North America. AMI's members produce the majority of meat and poultry products manufactured in the United States.

Food Marketing Institute (FMI) conducts programs in public affairs, food safety, research, education and industry relations on behalf of its 1,500 member companies — food retailers and wholesalers — in the United States and around the world. FMI's U.S. members operate approximately 26,000 retail food stores and 14,000 pharmacies. Their combined annual sales volume of \$680 billion represents three-quarters of all retail food store sales in the United States. FMI's retail membership is composed of large multi-store chains, regional firms and independent supermarkets. Its international membership includes 200 companies from more than 50 countries. FMI's associate members include the supplier partners of its retail and wholesale members.

Producer-directed and consumer-focused, the National Cattlemen's Beef Association is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry.

The National Chicken Council (NCC) is the national trade association representing the integrated chicken industry. NCC member companies produce, process and market over 92 percent of the chickens sold in the United States.

National Grocers Association (N.G.A.) is the national trade association representing the retail and wholesale grocers that comprise the independent sector of the food distribution industry. An independent retailer is a privately owned or controlled food retail company operating in a variety of formats. Some are publicly traded but with controlling shares held by the family. Most independent operators are serviced by wholesale distributors, while others may be partially or fully self-distributing. Independents are the true "entrepreneurs" of the grocery industry and dedicated to their customers, associates, and communities.

The National Pork Producers Council (NPPC) is a national organization that represents, through forty-four affiliated state associations, the nation's pork producers. NPPC membership accounts for most of America's commercial pork production. The U.S. pork industry is one of this country's most important agricultural sectors, accounting in a typical year for more than \$10 billion in annual farm sales. U.S. pork production generates overall economic activity of approximately \$64 billion annually and supports an estimated 600,000 American jobs.

The National Turkey Federation is the advocate for all segments of the U.S. turkey industry, providing services and conducting activities that increase demand for its

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members' products and protect and enhance the ability to effectively and profitably provide wholesome, high quality, nutritious turkey products.