

January 7, 2019

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue, SW
Mailstop 3758, Room 6065
Washington, DC 20250-3700

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Rm. 1061
Rockville, MD 20852

Re: Docket Nos. FSIS-2018-0049: Final Rule: “Uniform Compliance Date for Food Labeling Regulations.” 83 Fed. Reg. 63052 (December 7, 2018) and FDA-2000-N-011: Final Rule: “Uniform Compliance Date for Food Labeling Regulations.” 83 Fed. Reg. 65294-65296 (December 20, 2018).

To Whom It May Concern:

The North American Meat Institute (NAMI or Meat Institute) is the leading voice for the meat and poultry industry. Formed from the merger of the American Meat Institute and North American Meat Association, the Meat Institute has a rich, century-long history and provides essential member services including legislative, regulatory, scientific, international, and public affairs representation. Together, the Meat Institute’s members produce the vast majority of U.S. beef, pork, lamb, and poultry, in addition to the equipment, ingredients, and services needed to produce the safest and highest quality products. Many of the Meat Institute’s members operate dual jurisdiction facilities. NAMI appreciates the opportunity to provide comment to the Food Safety and Inspection Service (FSIS) and Food and Drug Administration (FDA; collectively, the agencies) on the above-referenced dockets.

Food labeling regulations are under the jurisdiction of many different agencies. Both FSIS and FDA issued separate final rules establishing January 1, 2022, as the uniform compliance date for new food labeling regulations issued between January 1, 2019, and December 31, 2020. A uniform compliance date for labeling changes allows the industry to plan label inventories and resource allocation to minimize the economic impact of complying with the changes. Frequently changing labels may also confuse consumers because they may not be able to compare labels across similar products if the required information is not consistent.

The agencies also reserved the right to establish a different compliance date if special circumstances warrant. In that circumstance, the agencies will identify an appropriate compliance date and include it in the rulemaking. Should either agency identify label changes that warrant a different compliance date, the Meat Institute encourages the agencies to coordinate with each other and other food labeling agencies to harmonize compliance and enforcement expectations because a single, uniform compliance date benefits both consumers and industry. Separate rulemaking efforts could result in a patchwork of different compliance dates, which would be onerous and costly to the industry because labels would need to be changed frequently to comply with the different standards.

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The meat and poultry industry is committed to providing accurate and appropriate information on product labels. The Meat Institute supports coordinated, uniform label compliance dates within FSIS, FDA, and across relevant agencies, which will allow for responsible allocations of industry resources and ensure consumers receive accurate, consistent, and applicable information about the meat and poultry products they purchase and consume.

The Meat Institute appreciates the opportunity to submit comments on the above-referenced dockets. If you have questions about these comments or anything else about this issue, please contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "Susan L. Backus". The signature is written in a cursive, flowing style.

Susan L. Backus
Vice President, Regulatory and Scientific Programs

cc: Julie Anna Potts
Mark Dopp