



NORTH AMERICAN MEAT PROCESSORS ASSOCIATION
ASSOCIATION AMÉRIQUE DU NORD DES TRANSFORMATEURS DE VIANDE
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NAMP Urges Members to Write FSIS and the Hill on Draft Validation Guidance

WASHINGTON, DC, APRIL 12, 2010 - NAMP has urged all U.S. processor members to write FSIS Administrator Al Almanza and their Congressional representatives to oppose the FSIS draft guidance validation guidance document in its present form. Earlier today, NAMP sent processor members a copy of the draft guidance document, a summary, and suggested language for their communications to Almanza and the Hill.

Last Monday, a coalition of industry associations including NAMP had another meeting with Almanza and FSIS officials, and Almanza met with industry groups again on Wednesday in a regular monthly briefing. At Monday's meeting, the coalition stressed it views this document as a fundamental policy change not merely a guidance, that the document requires in-plant validation by microbiological testing for even the most basic and time-tested processes, and it imposes a cost burden on processors with no discernable food safety benefit.

NAMP and other industry associations requested an extension on the comment period. FSIS granted an extension until June 19, Almanza told the group on Wednesday.

Although the comment period was extended, NAMP urged all its U.S. processor members to submit their comments now, and to alert their members of Congress about the significant adverse impact this proposed guidance could have on their cost of doing business with no known improvement to food safety.

"Companies should not have to validate that the sun rises in the East," one coalition participant said after last Monday's meeting.

The approach is unnecessarily broad in scope, and not focused on possible specific needs for in-plant validation. For example, companies would be required to validate by in-plant microbiological testing the cooking processes in Appendix A.

While NAMP opposes the draft guidance document, it does appreciate the willingness of FSIS to meet with NAMP and the coalition, to get the document out to industry informally for comment, and to listen to industry's concerns. Although it is still early in the process, these actions by FSIS indicate industry's feedback may have a constructive impact on FSIS decision-making.

FSIS is circulating the document informally to solicit stakeholder feedback before FSIS puts it into the formal Office of Management and Budget (OMB)/Federal Register notice process.