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December 19, 2006

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250

RE: Docket No. FSIS 2006-0036

Notice of Request for Extension of a Currently Approved Information Collection (Registration Requirements)

The American Association of Meat Processors (AAMP) is pleased to submit the following comments on Docket No. FSIS 2006-0036, "Notice of Request for Extension of a Currently Approved Information Collection (Registration Requirements)." AAMP is an international organization whose members include meat and poultry processors, slaughterers, caterers, food service companies, wholesalers, retailers, suppliers, and consultants to the meat and poultry industry. There are 33 state, regional, and provincial associations of meat processors that are also affiliated with AAMP. Majority of our members are small and very small businesses, with most of being them family-owned and operated.

AAMP and its members share the common goals with the Food Safety and Inspection Service (FSIS) to improve food safety and reduce the risks to public health. FSIS' request to extend the approved information collection addressing paperwork and recordkeeping requirements regarding registration of facilities as required by the Federal Meat Inspection Act (FMIA) and the Poultry Products Inspection Act (PPIA) is certainly a logical request. Meat brokers, renderers, animal food manufacturers, wholesalers, public warehousemen, and meat and poultry handlers should be required to submit such basic information to FSIS in order for the Agency to ensure that products are verified as safe, wholesome, unadulterated, and properly labeled.

Since those who register with FSIS must do so if they do not operate under Federal Inspection and "deal in meat and poultry products in or for commerce," what is the overall purpose of collecting this information and how is the information handled after it is collected? Are custom and retail exempt establishments are required to complete this form? Additionally, it would be beneficial for the industry to have knowledge of how this information impacts the control of retail and custom exempt establishments if they are included in the information collection. The burden surrounding the completion of this paperwork is minimal and reasonable directions are included with FSIS Form 5020-1, Registration of Meat and Poultry Handlers.

How does the Agency currently notify brokers, renderers, animal food manufacturers, wholesalers, public warehousemen, and meat and poultry handlers of their obligation to provide the information requested in FSIS Form

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5020-1? To increase the ease of collection, FSIS may want to offer more information about the requirements on their website so interested parties are able to find the information quickly and in one location. Any methods to minimize the burden of accessing and completing the form would be appreciated by industry.

AAMP encourages FSIS to continue maintaining transparency throughout all rulemaking processes and appreciates this opportunity to comment on FSIS Docket No. 2006-0036.

Sincerely,

Andrea H. Brown

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Director of Legislative and Regulatory Affairs

cc: Jason Jennings, AAMP President