Schnucks

The Friendliest Stores in Town

April 4, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

06-4219297
AMS

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

I am the Deli/Seafood department manager for one of the stores in the Schnuck Markets, Inc. supermarket chain. As such, I am very concerned about the country of origin labeling guidelines that you issued.

Our seafood department offers a wide variety of seafood products to consumers on a daily basis. The task of identifying the country or territorial waters in which each flesh or shell fish that we offer to consumers was caught or raised and processed is enormous. We must be able to depend on our suppliers for that information and you must hold them accountable through strict enforcement mechanisms. We cannot look at a shrimp and determine whether it was caught in U.S. territorial waters or in the waters of Thailand; nor can we tell whether the fish was farm-raised or wild caught and, if the latter, the flag that flew on the vessel that caught the fish. The operational challenges of labeling each of those items for retail sale on a daily basis are substantial.

As you develop the regulations, please consider the following:

- Hold suppliers back to those who raise or catch seafood accountable for providing accurate information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of seafood products at retail; and
- Implement reasonable recordkeeping requirements.

Please issue regulations that will allow us to continue to provide consumers with a fresh and abundant supply of seafood.

Sincerely,

Deli/Seafood Department Manager
Schnuck Markets, Inc.

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