Zallie Supermarkets, Inc.

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

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

Dear Secretary Veneman:

This letter is in response to your request for comments on the USDA's Country of Origin Labeling (COL) Voluntary Guidelines.

I am the owner of a family owned supermarket business being charged with the unprecedented responsibility to inform customers of the country of origin for all non-processed beef, pork, lamb, fresh/frozen fruits and vegetables, fresh/frozen seafood (for which we must also identify the method of production), and peanuts sold in our store(s).

Our associates cannot look at a package of meat to determine where an animal was born, raised, or slaughtered, neither can they determine where an apple is grown nor where a fish was caught or raised; yet under the guidelines we are responsible for providing that information to our customers. As you develop regulations, we encourage you to be flexible in labeling or signage requirements. Non-compliance for something we have little control over could ultimately result in a $10,000.00 fine for incorrectly or non-labeled products. That is blatantly unfair.

During the regulation development process we also ask that you hold suppliers, not retailers, accountable for labeling their products. The suppliers must be responsible for accurate information provided to retailers and consumers.

Under the voluntary guidelines, records must be maintained for 2 years. Most of the products covered in the COL law will be sold and consumed prior to the 2-year period. It serves no useful purpose to keep records of an apple consumed 2 years ago. I urge you to implement reasonable record keeping requirements that include hard or electronic versions, and most importantly that the record keeping be ultimately the responsibility of the supplier.

Very truly yours,

George Zallie

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