PICK *QUICK* FOODS, INC.

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KEY FOOD MEMBER

May 20, 2003

Country of Origin Labeling, Program
Agricultural Marketing Service, USDA
Stop 0249, Room 2092-S
1400 Independence Avenue, S.W.
Washington, D.C. 20250-0249

Gentlemen:

We have reviewed the Country of Origin Labeling rules in the Federal Register. We are adamantly opposed to this proposal.

The voluntary guidelines as written will provide a framework for a system that will shift costs and record keeping burdens to Independent retailers that will have to be reflected in consumer prices.

The current COOL requirements would hold retailers accountable for maintaining a complete and verifiable two-year audit trail for covered items at store level. The records would go as far as having to indicate where an animal was born or the country in which a produce item was grown. This burden of proof should be the responsibility of producers and suppliers. They should be verifying and certifying the country of origin.

The USDA has drastically underestimated the cost burden that the record keeping alone would place on an Independent retailer. AMS (Agricultural Marketing Service) estimated the cost at $628 million per year for retailers for the first year alone and that does not include costs for printing and applying labels and changes to computer systems.

The COOL program is anti-small business. Independent retailers will face disproportionately higher compliance costs as compared to our larger competitors.

We are in the business of servicing our customers. The costs of this proposal and the time incurred in association with adhering to this proposal will severely impact our ability to service our customers.

Thank you,

Jules B. Levine
President

JLB/mc