January 17, 2003

Country of Origin Labeling Program
Agricultural Marketing Service, USDA
Stop 0249, Room 2092-S
1400 Independence Ave., SW
Washington, DC 20250-0259

Re: Docket #LS-02-13 Establishment of Guidelines for the Interim Voluntary Country of Origin labeling Program

To Whom It May Concern:

I am writing to you to oppose the Agricultural Marketing Service's request for emergency approval for the record keeping system under this program. As I have stated previously, I believe that supplies should be held responsible for labeling and record keeping.

We are a family owned supermarket business continually grappling with not only the high costs of doing business, but also being in compliance with a myriad of local, state and federal regulations.

It is unreasonable to hold our produce, meat, frozen foods and fish departments (who change hundreds of items on a daily basis) responsible for record keeping and labeling of a product's country of origin. Our associates have no way of knowing where the product originated and if we were charged with the responsibility of auditing supplies, we could not unequivocally state to you that the information they provide to us is correct. Labeling and record keeping accuracy must be the responsibility of the supplier.

I urge the Office of Management & Budget to deny emergency approval for the record keeping requirements allowing the food industry to work with the USDA for solutions to this highly complex program.

Very truly yours,

Michael Perlmutter
Co-owner

cc: Office of Management & Budget
New Executive Office Building
725 17th St. NW Room 725
Washington, DC 20503
Attn: Desk Officer

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