April 9, 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:

I am writing in response to your request for comments on the U.S. Department of Agriculture's (USDA's) "Guidelines for the Interim Voluntary Country of Origin Labeling of Beef, Lamb, Pork, Fish, Perishable Agricultural Commodities, and Peanuts" (hereinafter Voluntary COL Guidelines).

As a food retailer, the law holds me responsible for informing consumers of the country of origin of all non-processed beef, pork, lamb, fresh and frozen fruits and vegetables, fresh and frozen seafood (for which we must also identify the method of production), and peanuts that are sold in our retail stores. Only my suppliers know the country of origin of these products. I cannot look at a bunch of bananas and know whether it is from Costa Rica or Guatemala; I cannot look at a package of hamburger and determine whether the cow was born and raised in Canada or born in the US and raised in Canada, or born, raised and slaughtered in the U.S. **USDA must issue regulations that will hold suppliers responsible for giving me complete, accurate and verifiable information.**

The operational challenges of labeling each of these items for retail sale on a daily basis are just enormous, if not impossible.

Moreover, the requirement to keep two years of records at every retail store on the country of origin of every covered commodity is outrageous. Most of these perishable products are sold and consumed within a few days. I simply do not have the physical or electronic storage capacity to keep two years worth of records on the country of origin of every covered commodity in every store.

Please issue clear and reasonable regulations that will allow me to comply with the law without putting me out of business or limiting my ability to continue to provide consumers with a fresh and abundant supply of food products.

Sincerely,

Michael P Nutley

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