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ALABAMA RETAIL ASSOCIATION

January 26, 2005

Secretary William T. Hawks
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 Interim Final Country of Origin Labeling Regulation for Fish and Shellfish (Docket No. LS-03-04)

Dear Mr. Hawks:

I am writing on behalf of the members of the Alabama Retail Association in response to the U.S. Department of Agriculture's request for comments on the interim final regulation for country of origin labeling for fish and shellfish. We have an issue of concern that we hope you will consider in the final rule.

We ask you to simplify the record keeping requirements in the final regulation. When a retailer receives a complete record from the supplier, this record should serve as the only record that needs to be maintained by retail stores, including their corporate headquarters. Such complete record would include the supplier's name and contact information; the type of seafood; its country of origin and method of production; and a lot code number or other unique identifier, such as a pack date or a sell by date. A supplier has firsthand knowledge of the origin and production of seafood item and thus, is the only entity that can properly validate the origin and production claims made.

We would appreciate your careful consideration of our request.

Sincerely,

Charles McDonald

Charles McDonald
President

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