
August 19, 2019

Roberta Wagner
Assistant Administrator
Office of Policy and Program Development
Food Safety and Inspection Service
1400 Independence Ave. SW
Mailstop 3758, Room 6065
Washington, DC 20250-3700

RE: Petition Submitted by National Bison Association July 22, 2019

Dear Ms. Wagner:

The North American Meat Institute (NAMI or the Meat Institute) submits this letter to support the petition submitted by the National Bison Association (NBA) requesting a change to the regulation on generic label approvals. The Meat Institute has a rich, century-long history and provides essential member services including legislative, regulatory, scientific, international, and public affairs representation for the meat and poultry packing and processing industries. Together, NAMI members produce the vast majority of U.S. beef, pork, lamb, and poultry products in the United States.

The Meat Institute supports the petition, in which NBA asks the agency to revise 9 CFR 412.2 to allow establishments receiving voluntary inspection services the option of generically approving labels under the regulation. The proposed change, if adopted, would allow processors of exotic species, *e.g.* bison, to generically approve labels, barring other circumstances such as special claims. The proposed change would benefit all FSIS regulated entities because reducing the number of label submissions for exotic species will likely result in a quicker turnaround generally for labels requiring submission.

The agency should carefully evaluate whether the proposed changes meet the standards for foregoing public comment in the rulemaking process. The notice and public comment procedure is an important part of the rulemaking process and a direct final rule should only be issued under appropriate circumstances.

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Thank you for the opportunity to provide this input. The Meat Institute respectfully requests FSIS grant the petition and move forward with rulemaking. Please contact me if you have questions concerning this letter or anything else regarding this matter. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, consisting of several overlapping loops and curves, positioned below the text "Respectfully submitted,".

Casey Lynn Gallimore
Director, Regulatory and Scientific Affairs
North American Meat Institute

cc: Julie Anna Potts
Mark Dopp
Rachel Edelstein
Melissa Hammar