

Comment Info: =====

General Comment: This proposed rule has some good aspects, and a few causes for concern.

First, the proposed rule will arguably reduce industry confusion and/or irresponsibility. By achieving its goal to improve the clarity and consistency of application for all laboratories participating in the ALP (Accredited Laboratory Program), and create a more succinct set of regulation, the agency helps the industry do what it arguably couldn't do on its own.

Further, this rule will help the meat and poultry industries, by increasing rapidity of analytical results to avoid having to reprocess or recall their products.

The proposed regulation will also be good for private labs, which range from large businesses and universities to one or two-person companies. They will arguably have increased business (because of convenient location and faster speed than the Federal labs).

Although business may be taken away from the labs, the government bears the cost of FSIS analysis. Therefore, government expenditure may be lessened as some business drifts to private labs, and with less demand the turnover time will quicken. This is good.

However, I do have a few concerns about the rule. To a consumer who can buy his or her meat or poultry at the store immediately after they decide to buy it (and thus, aren't necessarily affected by a wait time like the industry itself), increased time may not be an important concern. He or she may be more concerned that testing is accurate, and may think government, not private, labs are the more experienced labs. Also, consumers may be concerned that the meat and poultry industry's increased cost (assuming there is a net increased cost after considering all relevant factors) will be passed on to consumers. Has this been considered? It seems the agency didn't think the net cost of this proposed rule would be substantial...

Also, would it be possible to do some random sampling to ensure the private labs are consistently meeting federal standards? I wonder to what extent industry pressure for even faster testing will come at a cost of reduced consistency.