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July 11, 2005

Docket Clerk
US Department of Agriculture
Food Safety and Inspection Service
300 12th St, SW
Room 102 Cotton Annex
Washington, DC 20250

**[Docket No. 02-019P] Addition of Chile to the List of Countries
Eligible to Export Meat and Meat Products to the United States;
70 FR 24485; May 10, 2005**

Dear Sir or Madam:

The Food Products Association (FPA) submits the following comments on the docket referenced above.

FPA (formerly the National Food Processors Association) is the voice of the \$500 billion food processing industry on scientific and public policy issues involving food safety, food security, nutrition, technical and regulatory matters and consumer affairs. FPA's scientific centers and international office (Bangkok, Thailand), its scientists and professional staff represent food industry interests on government and regulatory affairs and provide research, technical assistance, education, communications and crisis management support for the Association's US and international members. FPA members produce processed and packaged fruit, vegetable, and grain products, meat, poultry, and seafood products, snacks, drinks and juices, or provide supplies and services to food manufacturers.

FPA supports the FSIS proposal to add Chile to the list of countries eligible to export meat and meat products to the US.

Per its normal process for determining eligibility of foreign countries to export meat or poultry products to the US, the FSIS review of Chile's laws, regulations, and other materials showed that its meat inspection system includes requirements equivalent to all provisions in the Federal Meat Inspection Act (FMIA) and its implementing regulations.

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According to the FSIS audit report for Chile, the FSIS on-site review team concluded that Chile's implementation of meat slaughter and processing standards and procedures was equivalent to those of the US. Under these circumstances, the US is under WTO obligation to permit the import of certified products from Chile (assuming compliance with APHIS and US Customs requirements as well).

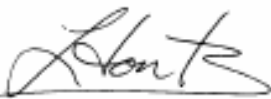
We concur with FSIS that listing Chile as eligible to export meat products to the United States will expand international markets and enhance the free flow of trade with Chile. This action is supportive of US trade initiatives and USDA's policy of liberalizing agricultural trade with Chile, and would honor US obligations to the World Trade Organization (WTO).

We also recognize that besides relying on its initial determination of a country's eligibility, coupled with ongoing reviews to ensure that products shipped to the US are safe, wholesome, and properly labeled and packaged, FSIS randomly reinspects meat and poultry products as they are offered for entry into the US.

We also believe that benefits would include increased availability to US manufacturers and US consumers of a greater quantity of meat items. Both nations would benefit from an expansion of trade in meat as part of a wide range of commodities.

We appreciate the opportunity to comment on this issue.

Sincerely,



Lloyd Hontz
Senior Director, Food Inspection Issues
Food Safety Programs