

02/07/2006 15:00 FAX 316 264 9078

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SAM BROWNBACK  
KANSAS(202) 224-4821 PHONE  
(202) 228-1265 FAX

# United States Senate

WASHINGTON, DC 20510-1604

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 COMMITTEE:  
 APPROPRIATIONS  
 COMMERCE, SCIENCE,  
 AND TRANSPORTATION  
 FOREIGN RELATIONS  
 JOINT ECONOMIC

February 7, 2006

Congressional Relations  
 U.S. Department of Agriculture  
 213 A Whitten Building  
 1400 Independence Avenue, SW  
 Washington, District of Columbia 20250

05-013N  
 05-013N-14  
 Ruggiero, Joseph

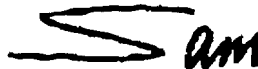
Dear Liaison:

Enclosed please find a letter sent to my office from Joseph Ruggiero of Lindsborg, Kansas, concerning a proposal to remove meat and poultry pizzas from the jurisdiction of the USDA food safety inspection service. I believe you will find the letter to be self-explanatory

I would appreciate it if you would review the enclosed letter and provide my office with any information that may be helpful in addressing Mr. Ruggiero's concerns. Please direct your response to Jarnie Woodworth in my Wichita office at (316) 264-8066 or 245 North Waco Suite 240, Wichita, Kansas 67202.

I am grateful for any assistance you may be able to provide in this matter.

Sincerely,



Sam Brownback  
 United States Senator

612 SOUTH KANSAS AVENUE  
 TORRELL, KS 66533  
 (785) 233-2803 PHONE  
 (785) 233-2616 FAX

1001-C NORTH BROADWAY  
 PITTSBURGH, KS 66762  
 (620) 331-6040 PHONE  
 (620) 331-6347 FAX

311 NORTH MAIN STREET, SUITE A  
 GARDEN CITY, KS 67846  
 (620) 275-3124 PHONE  
 (620) 275-1837 FAX

245 NORTH WACO, SUITE 240  
 WICHITA, KS 67202  
 (316) 264-8066 PHONE  
 (316) 264-9078 FAX

1111 WEST 93TH, SUITE 240  
 OVERLAND PARK, KS 66214  
 (913) 492-2390 PHONE  
 (913) 492-7252 FAX

[www.senate.gov/~brownback](http://www.senate.gov/~brownback)

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December 4, 2005

Joseph M. Ruggiero  
USDA FSIS CSI  
405 Cedar Circle  
Lindsborg, Kansas 67456

The Honorable Sam Brownback  
303 Hart Senate Office Building  
Washington, D.C. 20510

I am writing to you to express my concerns on an issue concerning a proposal to remove Meat and Poultry Pizzas from the jurisdiction of the USDA Food Safety Inspection Service. A joint public meeting with USDA and FDA to discuss and solicit public comment concerning the jurisdiction over certain food products that contain meat and poultry will be held December 15, 2005, from 10 a.m. to 4 p.m. at the Donald E. Stephens Convention Center, 5555 North River Road, Rosemont, IL.

As a current FSIS consumer safety inspector with 30 years in the agency, the last 10 which have been as Inspector-in Charge of the world's largest frozen pizza facility, I am submitting this letter in strong **disagreement** with the consideration of transferring jurisdiction of Meat and Poultry Pizzas from the USDA to FDA.

According to the Meat Inspection Act the term "meat food product" means any product capable of use as human food which is made wholly or in part from any meat or other portion of the carcass of any cattle, sheep, swine, or goats, excepting products which contain meat or other portions of such carcasses only in a relatively small proportion or historically have not been considered by consumers as products of the meat food industry."

The ultimate goal is to provide the consumer with a safe product that ensures a level of confidence that provides consistency and reliability. The USDA inspection legend that is affixed to each individual product has given the consumer a reassurance that is unsurpassed. Removing it would give the public reason to doubt the sincerity and integrity of government mandates.

Though the standard of identity for meat pizzas was rescinded in 2003, requiring that products need only contain 2 percent cooked meat or poultry by weight to be under FSIS jurisdiction, most of the individual products contain much more than the minimum requirements. The proposal to eliminate the standards came about to allow for more innovation in pizza manufacturing, not to eliminate the daily inspection of facilities and products. New products have been developed, but because of public demand, many of the ingredients and formulations have not changed.

The establishment that I currently am assigned to technically comes under the jurisdiction of USDA, FDA, the Military Inspection Service and the Food Nutrition Service (USDA performs inspections for meat and non-meat pizzas for the Child Nutrition program). USDA is the only government agency that conducts daily inspection procedures in this facility. Within the USDA, FSIS has a workforce of approximately 7,600 meat and poultry inspectors who monitor nearly 6,500 meat-processing facilities nationwide. FDA has some 1,700 investigators and inspectors who cover the country's almost 95,000 FDA-regulated businesses. During the first 5 years that I have been assigned to this present establishment, FDA inspectors have visited once. During the last five years, FDA visits were increased to three. If the jurisdiction of meat pizzas were removed from USDA, consumer protection to say the least would not be the same.

FSIS personnel inspect the entire plant premises including bakeries, production areas, packaging, storage facilities and outside areas daily. The bakery production systems are incorporated in the plant's Standard Sanitation Operating Procedures for operational as well as pre-operational activities. As a direct

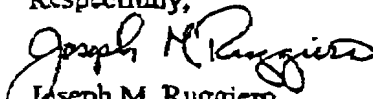
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result of daily FSIS inspection and the establishment's commitment, the plant operates under a high standard of operational and pre-operational sanitation that encompasses the entire premises. Although, traditional non-meat pizzas do not come under FSIS jurisdiction, USDA inspects the facilities, equipment, and utensils used in their production since meat and non-meat items can be produced simultaneously within the establishment or interchanged during the course of the day. In addition, non-meat pizzas for the Child Nutrition Program (School Lunch Program) are inspected by FSIS under a Memorandum of Understanding with the Food Nutrition Service that has been in effect since 1984. The Operational Sanitation Procedures apply to all products produced in this establishment, which benefit both the consumer and manufacturer.

Some interest groups would like to remove the daily USDA inspection activities that regulate this branch of the meat and poultry industry by redefining and reinterpreting federal law. The consumer historically expects meat products to be inspected by the USDA. Changing inspection frequencies, standards, and guidelines will not provide the consumer with the assurances that they expect and deserve. In a time with national security concerns, it does not appear to be sensible or prudent to reduce the inspection safeguards that have been in place for a staple product that is enjoyed by a broad consumer base.

Respectfully,

  
Joseph M. Ruggiero,  
Consumer Safety Inspector  
USDA, FSIS