



P O U L T R Y  
*perspective*

Ms. Sally White  
Director, International Equivalence Staff  
Office of International Affairs  
300 12<sup>th</sup> Street, SW.  
Room 102 Cotton Annex  
Washington, DC 20250

April 4, 2007

**RE: Food Safety and Inspection Service (FSIS), Docket No. FSIS-2006-0030,  
Eligibility of Chile to Export Poultry and Poultry Products to the United States, 72  
Fed. Reg. 8293**

Dear Ms. White,

I am writing in full support of the FSIS proposed rule to add Chile to the list of countries eligible to export poultry and poultry products to the United States. Now that FSIS has completed reviews that show that Chile's inspection standards, procedures, laws and regulations are equivalent to the USDA's Poultry Products Inspection Act and its implementing regulations, it is time to finalize the rule.

On the basis of extensive reviews of the relevant Chilean laws and regulations and on-site reviews of Chile's poultry slaughter inspection system in operation, FSIS concluded that Chile's poultry slaughter standards and procedures are equivalent to those of the United States. Chile has exceptional sanitary resources in the poultry industry and a production system that is vertically integrated. Chile also has high biosafety standards and geographic barriers that prevent the entry of diseases on the "A" list of the International Office of Epizootias (OIE). Poultry plants in Chile are expanding and updating their technology to comply with increasing world standards. There is no sanitary reason to delay granting market access for Chilean poultry products.

Apart from Chile's geographic isolation from animal diseases, the constant expansion and evolution of the poultry industry is a result, in part, of a strong investment in technology that has improved the efficiency of its processes and has developed environmentally sustainable activities. Additionally, Chile's compliance with the strict quality standards and import restrictions required by the European Union, the United States, Japan, South Korea, Mexico and China shows that Chile can meet any reasonable sanitary or quality regulation anywhere in the world.

The Ministry of Agriculture, through the Agricultural and Livestock Service (SAG), is the Sanitary Authority responsible for preventing the entry of animal diseases not known to occur in Chile and ensures that the country maintains its disease free status. It is the official agency in charge of inspection and certification in support of, development, competitiveness, and sustainability of the productive resources in the sanitary, environmental and food quality arenas.

The list of regulations and system controls includes:

- Good Practices
- HACCP System
- ISO Standards
- Integral Traceability Systems
- PABCO, official program of the government of Chile
- Epidemiological Monitoring
- Microbiologic Control
- Residue Control

Chile's production capacity and efficiency of its processes is also a result of a disease-free environment with favorable climatic conditions. Additionally, vertical integration enables producers in Chile to maintain a strict level of product traceability through the process and ensures product safety, quality, and reliability from the farm to the fork.

The industry has invested heavily in incorporating state-of-the-art technology that strengthens sanitary and production efficiency levels as well as market expansion through the implementation of free trade agreement provisions.

Accordingly, I urge FSIS to act on the conclusions of the Docket No. FSIS 2006-0030 upon close of the April 27, 2007 comment period and publish the final rule.

Sincerely,



Paul Aho  
Poultry Perspective