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7205 N.W. 68th Street, Bay # 14 • Miami, Florida 33166 U.S.A.

June 2, 2005

Docket Clerk

U.S. Department of Agriculture Food Safety and Inspection Service 300 12th Street, SW. Room 102 Cotton Annex Washington, DC 20250 02-019P 02-019P-5 Ole B. Nielsen

Subject: Comments on docket number 02-019 from FSIS-USDA.

Dear USDA:

The following comments are in response to the proposed rule to add Chile to the list of countries eligible to export meat and meat products to the United States.

Biotrade, Inc. is very much in favor of the proposed rule. Our company, based in Miami, is a supplier of fetal bovine serum (FBS) to large distributors of FBS in the U.S., Europe and Asia. We have modern FBS collection and processing facilities throughout Latin America.

In Chile, our company has 15 years experience dealing with the Servico Agricola y Ganadero (SAG), who inspects our FBS collection and processing facilities and certifies our FBS exports to Europe. We have always been impressed with the professionalism and seriousness which exists in SAG. Until now we have not been able to export FBS of Chile origin to the U.S. because the FSIS approval of the Chilean meat inspection system has been lacking.

Chile is known to have one of the best animal and plant health inspection services in the Americas. They have been able to eradicate Foot and Mouth Disease, Classical Swine Fever and New Castle Disease. Because of its location and geography, Chile's natural barriers make it easier to control the sanitary and phytosanitary status of the country. The Atacama Desert on the north, the Andes Mountains on the east, the Pacific Ocean on the west, and the Antarctica on the South, all serve as natural barriers to the entrance of diseases. As a result, Chile is free of many animal and plant diseases that are present in the rest of South America and even in the United States. For example, the following ruminant diseases have never occurred or been reported in Chile:

- vesicular stomatitis
- blue tongue
- aujesky (pseudorabies)
- screwworm
- boophilus ticks
- bovine babesiosis
- hemorrhagic septicemia

- malignant catarrhal fever
- scrapie.

All of the above diseases exist in other areas of South America, as well as in the United States, except for screwworm, boophilus ticks and bovine babesiosis, which have been eradicated from the continental U.S.

Because of this favored geographical location, and sanitary and phytosanitary status, Chile's government and private sector have been able to excel in their export programs, not only for fruits and vegetables, but also for live animals and animal products. This has resulted in very sophisticated controls, checkpoints and surveillance systems throughout the entire country, for both plant pests (such as the Mediterranean fruit fly) and animal diseases (such as Foot and Mouth Disease).

Again, Biotrade welcomes this proposed rule.

Sincerely,

Ole B. Nielsen

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June 2, 2005

**Agency: FOOD SAFETY AND INSPECTION SERVICE** 

Title: Addition of Chile to the List of Countries Eligible To Export Meat and Meat Products to the

**United States** 

Subject Category: Meat and poultry inspection: Meat and meat product exportation to United States; eligible

countries; addition- Chile

Docket ID: 02-0199

CFR Citation: 09 CFR 327

Comments Due: July 11, 2005 **Published**: May 10, 2005

Phase: PROPOSED RULES

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Author: Mr. Ole B. Nielsen

Organization: Biotrade Inc.

Mailing Address:

Comment: June 2, 2005

**Docket Clerk** 

Food Safety and Inspection Service U.S. Department of Agriculture

300 12th Street, SW.

Room 102 Cotton Annex

Washington, DC 20250

Subject: Comments on docket number 02-0199 from FSIS-USDA

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