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All Japan Yakiniku Association 2-3-20 Oji, Kita-Ku, Tokyo, Japan 114-0001

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Room 102, Cotton Annex,
300 12th and C Street, SW
Washington, DC 20250-3700.

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Taido Arai

To whom it may concern:

Our group, All Japan Yakiniku Association, is one of the industry groups consisting of individuals and companies who run "Yakiniku", or Japanese style barbeque, restaurants. It was found in 1992 and approved as an official group by the Ministry of Agriculture, Forestry and Fisheries in 1998. Currently, we have 438 members in our group, with 1359 restaurants in total. Our sales approximately account for \$ 1 billion annually.

Since the detection of BSE in the US last December, followed by trade ban on US beef and eventually stopping of US-meat supply, many of our members have been at a loss, for fear of running short of their stocks, as they greatly depend on US beef and variety meat. We are thus very anxious to get the trade resumed as soon as possible.

Under these circumstances, we would like to make a comment on the Federal Register, which states the additional safeguards against BSE, where it mentioned that "The distal ileum of all cattle (is specified risk material). To ensure effective removal of the distal ileum, the establishment shall remove the entire small intestine, and shall dispose of it" (§ 310.22.(a)(3)).

We, in Japan as well as other Asian countries such as Korea, share common culture which the beef and pork intestines are served for human food, in manner of barbequing or cooking. Off course you do not share the same culture and the need for the intestines is so limited in the US. But in Japan every "yakiniku" restaurant lists the intestines on their menu. The distal ileum was designated as Specified Risk Material also in Japan after BSE occurrence here. Despite the fact, the small intestine with the distal ileum removed is still saved and consumed in our country.

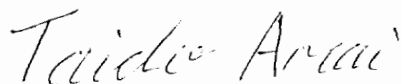
Cattle slaughtered in Japan come to around 4,500 heads a day, only a thirty of those in the US. We cannot but rely on the US beef industry to satisfy our "yakiniku" market. Furthermore, if production of the small intestine should be prohibited, there would be a possibility, we wonder, that the full intestines are unable to be harvested in view of

productivity. Suppose it turns into reality, not only the small but also the large intestine disappear from yakiniku restaurants' menu in Japan as well as any other country in the world for good.

We save the small intestine, removing the distal ileum by cutting 2 meters back from the junction between the distal ileum and the cecum, without any technical or practical difficulty. We are sure that the same procedure can be adopted in your country as well. Actually, some packers in the US had been producing the small intestine products with the distal ileum removed under the B. E. V. Program in compliance with our needs until December 23, 2003.

We would be very appreciated if you understand our situation and reconsider your rule, allowing the production of the small intestine with the distal ileum removed. Hoping food culture of Asian countries should be esteemed.

Respectfully,



Taido Arai

Chairman

All Japan Yakiniku Association

Cooperative Business Association