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April 2, 2004

FSIS Docket Clerk, Docket #03-025IF
Room 102, Cotton Annex,
300 12th and C Street, SW
Washington, DC 20250-3700.

To whom it may concern:

We would like to express our gratitude for an opportunity to comment on your proposed rules concerning BSE safeguards. Japan Foodservice Association was established in 1974 with the approval of Ministry of Agriculture, Forestry and Fisheries, by uniting restaurant industries along with related business circles, serving for the resolution of issues that the Japanese restaurants industry has and the improvement of customers' diet through establishing our management bases.

Our association consists of 824 companies with approximately 48,000 restaurants in total whose sales come to as much as \$500 billion annually.

Now that import of beef and beef products from the US has stopped, many of our members including beef bowl restaurant chains are faced with the difficulties ever experienced before. In the plight are also other members deploying chained restaurants mainly dealing "yakiniiku", or Japanese-style barbeque. As a representative of our industry, we strongly hope that the earliest resumption of the US beef import should be allowed.

We are writing to convey our opinion regarding the removal of Specified Risk Materials (SRM) mentioned in the final interim rule effective January 12, 2004 that was published as additional safeguards against BSE.

Food service industry in Japan has developed services of multi-national cuisines varying from traditional Japanese foods to Western foods and to Chinese foods unlike any other country in the world. Hence not all the materials for those restaurants can be supplied domestically; we are compelled to depend considerable amount of them upon import. As for meat, which is typical, import ratio is one of the highest. It may be no exaggeration to say that "Yakiniku" restaurant chains have been relying more than 80% of their materials on American beef.

It was widely reported during the end of January through the middle of February on television and in the newspaper that beef bowl restaurant chains, which depend most of their materials on the beef short plate from the US, were compelled to stop serving beef bowls. It would not be long before restaurants including “yakiniku” restaurants dependent mainly on American beef fall into the same situation. That is the reason why we urge the prompt settlement of the issue. The beef items that we rely much on the US are the short plate that is used for beef bowl; the chuck short ribs and the short ribs that are for “yakiniku”; the tongue, the outside skirt and the intestines that are representing parts of variety meat. Among them, the beef intestines called “horumon” in Japan are indispensable in the menu of “yakiniku” restaurants and very popular among customers.

We understand that FSIS has proposed the interim rule that prohibits the entire small intestine from human consumption because of the practical difficulty of distinguishing the distal ileum, although it admits only the distal ileum, not the entire small intestine, is specified risk material. In Japan, after the BSE cow was found in September, 2001, the small intestine is saved by cutting 2 meters back from the junction of the cecum, through the procedure the distal ileum is completely removed, in the slaughter house and distributed as safe food. The removed distal ileum is strictly segregated and destroyed by fire. This demonstrates that the distal ileum can be easily removed both technically and practically. The entire small intestine comes to more than 30 meters, while the distal ileum is just 2 meters. Removing the entire small intestine not just throws away the precious resource of protein but takes much money and effort for incineration.

We fear most that, suppose the entire small intestine is prohibited, the whole intestine including the large intestine would be removed and destroyed in line with management consideration for productivity and that we consequently would be obliged to give up them ever after.

Despite the ruling that the whole intestine should be removed in EU where the needs for it is rather limited, people in Asia have a traditional custom to eat the beef intestines, and we have a duty to preserve it by supplying them stably. For the food service business in Japan who has been relying most of the beef intestines on the US, stopping of the US-commodities supply implies the collapse of long-term-cherished food

culture of ours. The materials that have a risk for human should be eliminated but the foods that are good should be utilized, so we believe.

We strongly hope that you would wisely reconsider your interim rule to revise to allow the production of the small intestine with removal of the distal ileum.

Respectfully,

Kiwamu Yokokawa
Chairman
Japan Foodservice Association

Handwritten signature in Japanese calligraphy, reading 'Yokokawa Kiwamu' (横川 晃).