



NATIONAL CATTLEMEN'S BEEF ASSOCIATION

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October 14, 2004

Docket Clerk  
Food Safety and Inspection Service  
U.S. Department of Agriculture  
Room 102, Cotton Annex  
300 12<sup>th</sup> Street SW  
Washington, DC 20250

03-033P  
03-033P-1  
Gregg Doud  
Leah Wilkinson

**Re: Docket No. 03-033P "Frequency of Foreign Inspection System Supervisory Visits to Certified Foreign Establishments."**

Dear Docket Clerk:

On behalf of the National Cattlemen's Beef Association (NCBA) I want to express our appreciation for the opportunity to comment on the Food Safety and Inspection Service (FSIS) Docket No. 03-033P "Frequency of Foreign Inspection System Supervisory Visits to Certified Foreign Establishments." Producer-directed and consumer-focused, the National Cattlemen's Beef Association is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry.

The U.S. is the largest beef consuming nation in the world as well as the largest beef importing nation. The safety of both domestic and foreign produced beef imported into the U.S. is a top priority for the U.S. beef industry. U.S. cattle producers' income is derived completely from the marketplace, therefore maintaining a high level of consumer confidence in beef is crucial to our industry's continued success. To date, a significant measure of that confidence is derived from the equivalency measures that FSIS currently has in place to ensure that the safety of foreign produced beef is the same as that of our domestic production. FSIS needs to continue to work with foreign governments and establishments to further strengthen their science-based inspection programs. A great example of this is the new Food Safety Institute of the Americas. We encourage FSIS to find additional ways to help other countries assure the safety of the beef that they produce, but particularly when it is imported into the U.S.

NCBA understands the intent of this proposed rule, but we have some reservations with FSIS moving forward at this time without providing some clarification in a few areas.

First, how will FSIS determine what constitutes a "periodic" supervisory visit? Secondly, how does such a change affect equivalency standards? For example, if one country

conducts supervisory visits once every four months, and another continues with the monthly visits, will they still be considered equal or equivalent? Is a visit once every four months “periodic”?

There is no specific requirement that supervisory visits occur in domestic plants on a monthly basis, and we agree that this domestic program should remain the same. Our domestic supervisors are in constant (example: daily or as needed) contact with plant inspectors and these establishments making required visits within a specific time period unnecessary. However, foreign governments may not have the same (equivalent) level of interaction with their local inspectors (including contact by phone, e-mail, meetings or reports) that our domestic system provides. NCBA urges FSIS to carefully consider this type of interaction as an important component of the supervisory inspection system before making this proposed regulatory change.

If a foreign government cannot demonstrate necessary oversight of their inspection personnel, similar to that here in the U.S., then FSIS must consider that the country remain on a monthly schedule for supervisory visits.

Furthermore, even when sound regulatory procedures are in place, there are continual changes in regulations and procedures in today’s fast-moving world of international beef trade. Our point is that even if a country exporting beef to the U.S. is able to demonstrate regular interaction between government and the local inspector, there is still a need for a more timely routine for ensuring that the latest regulations and procedures are in place in that country.

FSIS is a public health agency that must continue to aggressively employ science-based measures to improve the safety of domestic and foreign produced meat and poultry products. Thank you for the opportunity to comment on this proposed rule.

Sincerely,



Gregg Doud  
Chief Economist



Leah Wilkinson  
Director, Food Policy