



January 23, 2006

Ms. Mary Ann Riley
Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW
Room 107 Cotton Annex
Washington, DC 20250

Re: *Federal Register*, Volume 70, Number 225, Wednesday, November 23, 2005, Pages 70746-70749, Docket Number 05-012P, RIN 0583-AD20, Addition of the People's Republic of China to the List of Countries Eligible to Export Processed Poultry and Poultry Products to the United States

Dear Ms. Riley:

The National Chicken Council, the National Turkey Federation, and USA Poultry & Egg Export Council appreciate the opportunity to jointly submit the following comments regarding USDA/Food Safety and Inspection Services' (FSIS) proposed rule to approve the People's Republic of China to be eligible to export processed poultry and poultry products to the United States. This proposal is important and has current and future implications for the safe and wholesome supply of poultry to the U.S. consumer.

In today's food market environment of heightened concern about food safety and the threat of animal diseases to the United States food supply, it is paramount that consumer trust and confidence in their food supply not only be maintained but continually re-affirmed and strengthened. The proposed rule outlines the applicable regulations for imported poultry products. Similarly, the final rule must also state the applicable provisions and safeguards required by USDA regulations.

As the proposed rule outlines, USDA's Food Safety and Inspection Service has a well-grounded, science-based program for permitting countries to be eligible to export poultry products to the United States. It is a rigorous standard, as it well should be. Countries that have adequately and fully proven their poultry inspection system to be equivalent to the standards of the United States qualify to have the opportunity to service the U.S. market. As the proposed rule explains, such qualifications must go beyond an initial determination. For U.S. consumers to have continued, ongoing trust and confidence in the poultry products they consume, there must be a stringent ongoing performance review of the facilities providing these products. This ongoing oversight

and authority is as important with foreign suppliers, if not more so, than the continuous FSIS inspection of domestic U.S. operations.

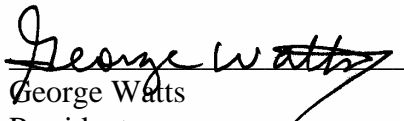
Also, as the proposed rule explains, all poultry products from China will be subject to re-inspection at U.S. ports-of-entry. Inspection and re-inspection will occur for a number of factors and reasons, as the notice explains. Consumer trust and confidence can easily be jeopardized, in not just imported poultry products, if chemically-contaminated or microbiologically-contaminated products are permitted to move into the U.S. marketplace before being detected.

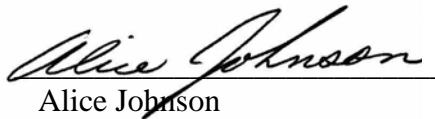
The proposed rule estimates that 25 establishments in China will be processing raw poultry sourced from the United States or from a USDA certified establishment in other countries. This raw poultry will be further processed into shelf-stable, cooked poultry products. First-year volume of these 25 establishments is estimated to be 2,500,000 pounds with an equal quantity to be added annually, according to the FSIS analysis using basic economics and the theory of comparative cost advantage. While such an amount represents only a fraction of a percent of the more than 41,000,000,000 pounds of ready-to-cook poultry processed in 2005, the ramification of a problem with this fraction of a percent is many times what the share of market represents.

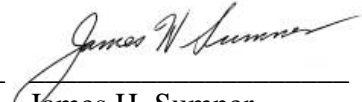
The volume of 2,500,000 pounds estimated in the proposed rule may prove to be accurate or it may prove to be modest. If, in fact, the actual quantities entering the United States are several times the FSIS estimated volume, there will be a greater burden on FSIS resources and budget to conduct the port-of-entry inspection, subsequent re-inspection, and related required activities. In any event, FSIS will have to be prepared to monitor and ensure that the volume and identity of the cooked poultry exported from China to the United States is consistent with the poultry imported from the United States or from a country whose poultry slaughter establishments are FSIS approved.

The National Chicken Council, National Turkey Federation, and USA Poultry & Egg Export Council look forward to FSIS making a sound decision about the proposed rule and implementing all necessary safeguards and provisions to minimize and prevent any situation that would cause U.S. consumers to become concerned about wholesomeness and food safety of the poultry products they consume.

Respectfully submitted,


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