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Comments in Reference to Docket No. FSIS-2006-0014
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USMEF would like to first thank FSIS for the opportunity to comment on Docket No. FSIS-2006-0014; Notice of Request for Extension of a Currently Approved Information Collection (Exportation, Transportation, and Importation of Meat and Poultry Products). The USMEF is a non-profit trade association working to create new opportunities and develop existing international markets for U.S. beef, pork, lamb and veal. The USMEF has eight distinct sectors, representing the entire U.S. red meat production, processing and distribution system. Allied industries, which provide critical inputs to the red meat industry, are also active on the USMEF Board of Directors. Over 90 percent of U.S. red meat exports are from red meat companies represented by USMEF. USMEF provides market intelligence for international markets and addresses concerns or problems faced by its membership in these international markets.

FSIS has requested responses in regards to the utility of collection of information for exports by using export certification documents. The export certification is extremely important as international trading partners require this information. Having FSIS officials sign export certification gives assurances to trading partners that the product was produced hygienically and according to approved procedures.

FSIS has estimated that this documentation requires a 24-hour time period to complete. We disagree with this estimate as it does not take into account several new regulations for beef exports. With the onset of Export Verification programs for beef managed by the USDA Agriculture Marketing Service and the requirement for not only a FSIS signature on export certification documents, but also an AMS official signature, the time for export certification has lengthened. In some cases, the "dual signature" requirement and the need for AMS and FSIS officials to review product codes to ensure eligibility, the time for export certification has grown to 48 hours in many cases; a technical error recently caused the time for certification to grow to

96 hours for some shipments. As the U.S. has failed to negotiate equivalency for pork and beef items in many cases, the estimated burden is not accurate. The current system, especially for beef exports, is extremely complicated and time-consuming; with different requirements for exports to different countries and with the time needed to transfer documents from a facility to USDA-AMS, review these documents, return the documents to the facility, have USDA-FSIS review the documents, and finally sign and release the documents and the shipment for export. With limited markets open for U.S. beef currently, this process could become overly burdensome as other, larger volume, markets open for U.S. beef.

The burden would be minimized if USDA could negotiate inspection equivalency with international trading partners. Currently the USDA-FSIS Library of Export Requirements details many requirements that require certification above and beyond the FSIS mark of inspection.

To ease this burden now and for future exports, a more automated electronic system would be greatly beneficial. A completely electronic system would create less burden on exporters and on USDA officials responsible for verifying product codes and other required information. The system would need to be comprehensive and would be most beneficial if set up to automatically reject incorrect product codes or other information. This would be a method to minimize the number of mistakes on export documents which can sometimes create delays and unnecessary costs. Currently, exporters still must use antiquated type-writers to complete documents; a computerized electronic system using electronic signatures for FSIS and in some cases AMS officials would decrease the time burden as well as reduce mistakes.

Thank you once again for allowing us to provide comment.

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