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Comments in Reference to Docket No. FSIS-2006-0017
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USMEF would like to first thank FSIS for the opportunity to comment on Docket No. FSIS-2006-0017; Technical Service Center Operations). 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.

USDA-FSIS has requested comments regarding several aspects of the FSIS Technical Service Center. While the Technical Service Center provides assistance and guidance in regards to many operations and areas, the comments we have provided below are specific to exports as this area has been the source of the primary interaction between USMEF and the FSIS Technical Services Center.

The Technical Services Center (TSC) plays a major role in red meat export operations as it helps to provide guidance and clarification to the requirements published in the USDA-FSIS Library of Export Requirements. The TSC assists exporters with documentation completion and also assists in times when documentation errors are committed. All in all, the TSC has proven to be a vital resource to keep U.S. red meat exports flowing smoothly and helps to minimize costs due to documentation errors and shipments hold-ups.

With this stated, the TSC has not been as efficient of a resource as it could be and probably needs to be. Unfortunately, it seems as though exports has been de-emphasized and thus there are minimal personnel available to assist with export questions and problems; creating delays in solving problems and increasing costs to exporters. Additionally, for exports, it appears that many of the personnel located at the TSC are unwilling to make decisions without consulting Washington DC personnel; in our mind this takes away much of the usefulness of the TSC as the communication process takes time which creates more costs to the industry.

In ever-increasing frequency, the U.S. has been unable to negotiate equivalent food safety measures with our trading partners and this has created a great deal of variation in the regulations when exporting to

different countries. All of these differences create opportunities for error and thus we believe that exports should be emphasized at the TSC, providing more qualified personnel to able to handle and solve problems associated with exporting red meat effectively. With many countries sending veterinary delegations to witness U.S. food safety and production procedures, there has been limited staff available at the TSC to effectively work with these groups; we believe that additional personnel that were clear on the various country requirements would be beneficial to making the veterinary delegation trips more productive. TSC employees should be given the authority to interpret and apply policy in consultation with Washington but without having to defer to Washington. This would greatly enhance the U.S. red meat industry's ability to expand red meat exports globally.

Thank you once again for allowing us to provide comment.

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