

Max Brugh, D.V.M., Ph.D.  
Poultry Health Specialist  
187 Stafford Drive  
Athens, Georgia 30605

RECEIVED  
FSIS DOCKET ROOM  
07 MAY -7 PM 2:23

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

From: Max Brugh



Date: April 20, 2007

Subject: **FSIS-2006-0030**, Eligibility of Chile to Export Poultry and Poultry Products to  
The United States

I am writing in support of the FSIS Proposed Rule to add Chile to the list of countries eligible to export poultry and poultry products to the United States [Fed. Reg. 72 (37): 8293-8296]. To be added to this list, a country's poultry inspection system must include standards equivalent to those of the United States, and the legal authority for the inspection system and its implementing regulations must also be equivalent to those of the United States.

After extensive review of relevant documentation provided by Chilean authorities, FSIS has concluded that the requirements contained in Chile's poultry slaughter inspection laws and regulations are equivalent to those of the United States. FSIS has also conducted two on-site reviews of Chile's poultry slaughter inspection system in operation. The on-site reviews also led to the conclusion that, as implemented, Chile's poultry slaughter standards and procedures are equivalent to those of the United States. These findings, described in detail in the full report on Chile's slaughter inspection system, provide strong support for Proposed Rule FSIS-2006-0030 and clearly indicate that it would be appropriate to finalize the Rule as soon as possible.

Chile's Ministry of Agriculture, through its Department of Agriculture and Animal Production (SAG), is the Sanitary Authority responsible for preventing the entry of animal diseases not known to occur in Chile and ensuring that the country maintains its disease free status. Veterinary authorities in SAG worked closely with the Chilean poultry industry in 2002 in well coordinated efforts to contain and eradicate an outbreak of highly pathogenic avian influenza. The manner in which this outbreak was handled provides further support Proposed Rule FSIS-2006-0030.

In the early stages of this outbreak, I served as an advisor to the impacted sectors of the Chilean poultry industry and met with SAG veterinary authorities on several occasions. Based on the questions being asked and the actions taken during that period, it was clearly evident that many well qualified and highly motivated people were involved in these efforts. This assessment was borne out by the remarkable success of the containment and eradication efforts. The attached article "The Avian Influenza Outbreak in Chile: A Good Example of Successful Crisis Management" [Poultry International 43(2): 34-39. 2004] describes how this success was achieved.