



ROBERT M. KERR

**FOOD AND AGRICULTURAL
PRODUCTS CENTER**

Division of Agricultural Sciences and Natural Resources



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November 12, 2021

FSIS Docket Clerk
Department of Agriculture
Food Safety and Inspection Service
Room 2534 South Building
1400 Independence Ave., SW.
Washington, DC 20250-3700

Reference: [Petition to Allow the Transportation of Beef Hides for Further Processing](#)

The Robert M. Kerr Food and Agricultural Products Center (FAPC) on the campus of Oklahoma State University is respectfully submitting the following petition for review. The petition is specifically requesting the amendment of current policy prohibiting beef hide transportation because of inedible status.

Current Agency policy states under 9 CFR 325.19 "Provisions inapplicable to specimens for laboratory examination, etc., or to naturally inedible articles. The provisions of this part do not apply: (a)...(e) To articles that are naturally inedible by humans, such as hoofs, horns, and hides in their natural state."

We propose the amendment to be stated in the following manner with the words strikethrough for deleting 9 CFR 325.19(e) To articles that are naturally inedible by humans, such as hoofs, horns, ~~and hides~~ in their natural state.

FAPC operates USDA establishment #526 for the purposes of educating students about animal harvest and fabrication, as well as assisting entrepreneurs in the food industry with establishing value added products. Since 2019, FAPC has been working with an entrepreneur to develop a process for an edible beef hide product using the hides from on-site beef harvest as the raw material. The next step for this entrepreneur is to obtain a USDA inspected establishment of their own to process the hides, and therefore we are submitting a protocol for future approval to transport the hides between establishments. A discussion has taken place through askFSIS and included in that discussion are photos and HACCP Plans for slaughter, hide transportation and processing controls.



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Working within the establishment, an approved process and HACCP plan were developed to remove hair, foreign material, and filth from the hides. Processing techniques derived from the client's cultural experience have been successfully implemented, and the finished product has been marked inspected and passed. The inspection mark has catapulted the reputation and marketability of the hide product. The existence of the product filled a market in the ethnic foods category that is being met by similar, but inferior uninspected products.

Furthermore, research into the current hide market have proven the hide is considered a waste. Processors do not receive monetary compensation for the hide, which amounts to 4.8% of the live animal. In 2015, the AMS estimated a hide to be worth \$6.96 for a typical steer. Reference: [NW LS441 \(usda.gov\)](#) (attached file) The current situation is that some processors actually pay for the hides to be removed from the facility. The success of this petition will reduce the number of hides being sent to a landfill and give the slaughter establishment the option to reduce material lost as waste.

When the basis of the policy in 9 CFR325.19(e) was originally formed, there did not exist an edible beef hide product market in the United States. The development of this process to utilize a wasted portion of the live animal and fill a strong market demand has created the need for the policy to be amended per this petition's request.

In conclusion, the definition of inedible product currently includes hides, and recent development of an edible hide product has proven the hide is edible. The current process is approved to take place in the slaughter establishment, however regulations prohibiting the transporting the inedible product for further processing prevents full utilization of the hide.

FAPC genuinely appreciates the Agency's consideration to remove this barrier to product development, and we look forward to receiving your response.

Reference for additional information, photos, and HACCP Plans: askFSIS # 00405780

Sincerely,

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