



Establishment 526
148 FAPC, Stillwater, OK 74078
Phone: (405)744-6071
food.okstate.edu

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Mary Porretta, Petitions Manager
Department of Agriculture
Food Safety and Inspection Service
1400 Independence Ave., SW.
Washington, DC 20250-3700

References:

- Petition #21-03, to Allow the Transportation of Beef Hides for Further Processing
- For additional information, photos, and HACCP Plans: askFSIS # 00405780

The Robert M. Kerr Food and Agricultural Products Center (FAPC) on the campus of Oklahoma State University has submitted a petition for review by the Office of Policy and Program Development. The petition specifically requests the amendment of current policy prohibiting beef hide transportation because of inedible status.

We propose the amendment to create a channel for transportation of hides to be processed into an edible food product. The existing channel for exporting and further processing of hides into inedible products should continue to exist as established. Working with our client at FAPC, we have generated a considerable demand for USDA inspected product and anticipate future growth of this market in the United States.

This document serves to provide additional supporting information regarding the net social benefit of the granted petition #21-03. The net social benefit described is based on past sales, market potential, environmental impact and small business support. Additionally, this document will provide education to whom it may concern about the finished product and how it is prepared.

The product is a familiar and traditional food staple for citizens of West Africa, the Caribbean, parts of Asia and parts of South America, however more education is needed for citizens of the United States to understand the product and intended preparation method. The finished product is a raw, frozen piece of 100% beef skin. The process begins with harvesting the hide from USDA inspected and passed cattle. The removed hide is treated as an edible by product in that is not allowed to touch the floor and is stored in a stainless-steel vat. The hide is cut into pieces of the appropriate size for singeing. The singeing process applies high heat directly to both sides of the skin. The burned hair and any



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remaining bits of tissue are scraped from the hide, and the hide soaks in ice water. The pieces are further cleaned, washed and scraped. After visual inspection, the pieces are allowed to air dry. The finished product is portioned and packaged into plastic pouches. The individual bags are labeled, packed into cases, and frozen for distribution. The traditional method of preparing the beef skin is to cut it into bite size pieces and boil it in a stew. The stew containing beef skin pieces is often served with rice.

This type of finished product was unintentionally unfamiliar to those originally writing the regulations regarding the beef hide as inedible. Providing USDA inspected product to this population of underrepresented people also contributes to their health and wellbeing. Unfortunately, this product is widely available on the black market and the processing methods are far less wholesome. The absence of good fuel sources leads people to use trash, rubber, oil, or other fuel sources that contain carcinogenic components and leave harmful residue on the finished product, which is consumed unknowingly. The product processed under an approved HACCP plan in USDA inspected establishments will make clean product widely available for consumers to purchase from a trustworthy source.

The past sales of the client's USDA inspected product are the only official numbers available at this time, due to the fact that other sales are illegally obtained. During 2019-2020, the client processed at OSU Food and Agricultural Product Center. The 1 lb. pouches were sold directly to consumers and wholesale to retail customers. The historical production volume totaled about 7,200 lbs./year, and the retail price point was \$9.00/lb. The production capacity was limited by the number of cattle slaughtered at the establishment. The demand for product far exceeded the ability of the OSU-FAPC slaughter facility to supply.

In terms of market potential, we predict a vast demand because the client continues to field requests for product nearing a year since the last production date. The client has established reliable customer connections through historical sales. The potential new customers can be based on the number of immigrants from countries where the product is traditionally consumed. 4 million people currently reside in the United States from the countries that are known to consume this type of product on a weekly basis. Examples of the countries are Nigeria, Cameroon, Ghana, Kenya, Liberia, Sierra Leone, Dem. Rep. Congo, Senegal, Togo, Uganda, and the Ivory Coast. In addition, parts of the Caribbean, parts of Asia, and parts of South America consumer this type of product. There is also a proven demand in Canada as a result of the immigrant population living there to be included in the future of this product's distribution. Overall, the resident population is multiplying, and the immigration numbers are increasing. The people are very eager to consume familiar food products and pass the cultural traditions down to the next generation.

Please find the attachments

- Pew Research Center articles: African immigrant population in U.S. steadily climbs, by Monica Anderson; and 1. The Caribbean is the largest origin source of Black



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immigrants, but fastest growth is among African immigrants by Christine Tamir and Monica Anderson

The third net social benefit of the potentially granted petition is to support small businesses in the slaughter industry and reducing the negative environmental impact. Currently most small slaughter establishments send the hides to a landfill as waste. This activity is also an added expense of up to \$1,000 per week to the processor and creates a negative environmental impact for the landfill businesses. Excess methane build up is the resulting burden of decomposable materials in landfills. Larger establishments can sell hides to the leather market, however smaller facilities in rural areas are not afforded the opportunity. This product offers the slaughter facility a revenue stream for their previously considered waste material, and alleviates the burden on the environment, while providing a welcome source of food for a minority population.

Please consider the above social benefits as support for the submitted petition requesting the amendment of current policy prohibiting beef hide transportation because of inedible status.

Sincerely,

Stephanie Baker
Quality Management Specialist
Stephanie.baker10@okstate.edu
Robert M. Kerr Food and Agricultural Products Center
Oklahoma State University