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Comments On Petition 23-06 To Remove The 50 Mile Geographical Radius for FSIS Port of Entry Inspection

To USDA FSIS,

I am writing to express our firm advocacy for the continuation of the 50-mile rule. Port of entry meat inspection at the US border under the 50-mile rule, is a proactive and critical component of the nation's food safety measures. This comprehensive inspection process is necessary to protect public health, ensure food safety, and prevent the introduction of diseases that could have far-reaching consequences for both consumers and the agricultural industry. Deviating from the rule would allow massive volumes of uninspected meat to enter American borders. This causes unnecessary risk and has dangerous implications to the integrity of the food safety system. Conducting meat inspection at the port of entry before product has entered the country is a critical practice for several reasons:

Timely Identification of Inadmissible Meat Products:

Imported meat must meet the regulatory standards set by the USDA. Conducting inspections at the port of entry ensures timely identification of contaminated, miss labeled or adulterated meat products. When meat is refused at the port of entry, swift action can be taken to prevent these products from entering the country. Either the meat is put into restricted storage or physically exported out of the USA and back to the country of origin. If meat was inspected inland this would take days or weeks to have product removed from the country. This increases the possibility for uninspected meat within the US borders to be lost and out of control of FSIS.

Focused FSIS Resources and Control:

The current system has I-houses located at strategic ports of entry, it allows for a focused and manageable approach to meat inspection. Expanding this to include inland inspection would significantly increase number of inspection locations required. This would necessitate a considerable increase in FSIS resources and personnel. Expanding meat inspection inland would require a substantial increase in the number of on-site inspectors. FSIS would need to recruit, train, and deploy inspectors to these additional locations, which poses logistical and administrative challenges. This would make it increasingly difficult to ensure that the newly recruited inspectors possess the necessary training and expertise that is crucial for maintaining consistent and effective meat inspection standards.

The significant expansion of the inspection workforce would have budgetary implications for FSIS. Additional funding would be required to cover salaries, training programs, equipment, and other resources necessary for the proper functioning of the expanded inspection system.

These changes could threaten the viability of the current system which has been operating safely and efficiently at little to no expense to USDA. The increased cost per pound, which is passed to the consumer, to cover meat inspection will only add to the current high price of food.

Maintaining Traceability and Control:

Inspecting meat at the port of entry provides better control over the entry of products, ensuring that they meet U.S. standards before reaching the market. This is essential for investigating and addressing potential contamination issues, facilitating recalls, and holding responsible parties accountable for ensuring the safety of the food supply chain.

As an example, in late 2022 records show that 27 shipments of meat from Australia had USDA approval to enter California and move to Chicago for import inspection. This was a rare exception that can be used as an example of how meat inspection would function if the 50-mile rule was removed. FSIS tracing on those shipments failed. The shipments were lost and out of USDA control. If import meat inspection is allowed to move inland, the number of import inspection locations must greatly increase. Instead of a single import inspection facility doing multiple shipments at one location those shipments will then require import inspection at

multiple locations all over the country. This could result in lost meat shipments out of USDA control and inevitably more product recalls.

Challenges in Recall Procedures:

The further that imported meat shipments travel from Port of Entry without inspection, the higher the risk of potential food safety breaches such as a failure to present for inspection or processing of uninspected meats. Coordinating inspection activities and responding to potential issues in a timely manner become more complex, allowing potentially unsafe products to circulate in the market before authorities can intervene. Maintaining a rapid response capability is crucial for addressing food safety concerns and preventing the entry of contaminated products into the market.

If uninspected meat is allowed to enter the border it increases the chances that it can be processed with other meat and introduced into the food supply. In the event of contamination, recalling products that have already been processed and entered the market becomes drastically more challenging. This results in a slower response, increased cost, and increased need for public concern in the event of a recall.

Drawing parallels with other security and safety protocols, such as airport security reinforces the effectiveness of port of entry inspection. Just as travelers are screened upon entering airports and spectators pass through metal detectors at large event venues, the American consumer is best protected when inspection occurs immediately upon entry at the port.

Despite advancements in data sharing, preclearance, and harmonization efforts, the importance of verification within the 50-mile geographical radius at the port of entry cannot be overstated. This system remains the most efficient, effective, informative, and sometimes the only means to safeguard the American consumer while ensuring a secure and wholesome supply of imported food.

In conclusion, the 50-mile rule for inspecting imported meat at the U.S. border is a crucial measure for safeguarding public health, protecting agriculture, and maintaining the integrity of the national food supply chain. The proactive nature of border

inspection, as opposed to inspecting meat inland, ensures early detection, rapid response to potential threats, and effective FSIS control over the safety of imported meat products. The establishment and enforcement of stringent inspection protocols at the border are vital for promoting food safety, preventing disease outbreaks, and upholding the nation's responsibility of keeping a safe food supply chain for the American consumers.

Sincerely,

Ross Tisdale

Vice President

US Import Meat Inspection