

November 8, 2023

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United States Canadian Border Inspection Agency

3555 Witmer Road

Niagara Falls, NY 14304

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

Dear Sir or Madam:

We strongly urge you to keep in place the 50 mile radius rule to conduct Port of Entry FSIS Import Inspection. One of the most important safeguards regarding FSIS food safety is port of entry meat inspection.

Port of Entry (POE) FSIS import inspection is called "PORT" of Entry for a reason. All FSIS import inspection activity takes place at the ports (within 50 miles) to provide the USDA maximum control over imported meat products.

The further away from the port of entry an imported meat shipment travels without being inspected, the greater the chances are for a food safety incident including but not limited to: Failure to present for inspection, processing of uninspected imported meats, comingling of hazardous materials on meat trailers, undue pressure on USDA inspectors from processing facility management eager to process the imported meat.

All of these reasons are why the USDA GAO audits found that in-land inspection does not provide the same level of protection OR control as port of entry inspection. The further away from a border that the inspection takes place, the greater the chances are for uninspected contaminated imported meat to enter the food supply.

The GAO, July 1990 report on FSIS Port of Entry inspection stated that FSIS import inspection had to be performed at an inspection facility near the border to improve control by inspecting imported products as soon as it entered the United States.

This same logic has held true to this day with multiple GAO/OIG reports requesting USDA to have MORE control over imported meats -- not less control. The most control the USDA has over imported meats is when the inspection is performed within the 50 mile radius at the port of entry.

When citizens of a foreign country attempt to legally gain access into the USA, they are met and vetted by a United States CBP official at the port of entry, not at their inland hotel room.

When you depart an airport for a vacation, TSA screens you and your baggage when you enter the airport -- not after you land at destination.

When you arrive at your favorite professional sports team venue, you walk through the metal detectors while entering the stadium, not at your seat during the event.

With this knowledge and a superior port of entry border inspection program (within a 50 mile radius) in place that has protected the American consumer and verified foreign equivalence for many years, we strongly urge you to keep the 50 mile radius on port of entry meat inspection on all meat products. Port of entry meat inspection is efficient, effective, informative, and sometimes the only way to protect the American consumer while maintaining a safe and wholesome supply of imported food.

No amount of data sharing, preclearance, or harmonization will ever eliminate the need for verification activity within the 50 mile geographical radius at the port of entry.

No amount of data sharing, preclearance, or harmonization will ever provide the American consumer with imported food safety assurances like the current system of performing port of entry meat inspection within the 50 mile geographical radius.

Thank you,

Walter R. Piatkowski

USCBIA Treasury/Secretary