

September 3, 2014

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

Petition submitted under 9 CFR 392 to amend 9 CFR 352.1(k)

Submitter

International Yak Association (IYAK)
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IYAK, a 501c3, manages the herd book (breed registry) for registered yaks and represents the yak industry in the United States. website: IYAK.org

Requested Action

Amend 9 CFR 352.1(k) to include Yak under the definition of Exotic Animal.

Current wording: *Exotic animal* means any reindeer, elk, deer, antelope, water buffalo or bison.

Requested change: *Exotic animal* means any reindeer, elk, deer, antelope, water buffalo, bison or yak.

Problem Statement

Sometime in the second or third quarter of 2014 USDA FSIS issued an order to cease inspecting yak meat. This order was by internal memo that petitioner does not have access to. The cease order was unannounced and unanticipated, resulting in the cessation of interstate commerce in yak meat. Prior to this order FSIS had inspected yak meat for at least 28 years, according to IYAK members that had meat inspected. This history of inspections by FSIS has created an expectation among breeders that their products will be inspected, and among buyers that they are purchasing a safe and healthy product for consumption or resale.

Yak breeders and their customers have spent decades building businesses around the expectation of USDA-inspected meat products. Dropping yak inspection will compromise, perhaps fatally, these viable business models.

The cease order was based on the definition of an exotic animal in 9 CFR 352.1(k), which does not currently include yak. It was not based on food safety. To the best of IYAK's knowledge there has never been any incidence of sickness or meat recall related to yak meat. IYAK believes that USDA inspection is important to insuring a safe food supply and desires yak to be included as an exotic species as defined by 9 CFR 352.1(k). The scientific name for yak is *Bos grunniens*; they are domestic cattle in the same genus as beef cattle (*Bos taurus* and *Bos indicus*).

According to IYAK members, historically yaks have not been inspected uniformly across the country. Some plants would inspect them as an exotic (triangle stamp) while others would inspect them as cattle (round stamp). Acceptance of this petition will result in uniformity across the country, reducing confusion with inspection and label approval, and provide a consistent basis for interstate commerce.

Petitioner is unaware of any negative consequences to the requested action.

Respectfully submitted,

Jim Watson
International Yak Association