

1999 DRAFTING REQUEST

Assembly Joint Resolution

Received: 02/07/2000

Received By: traderc

Wanted: Soon

Identical to LRB:

For: Glenn Grothman (608) 264-8486

By/Representing: Scott

This file may be shown to any legislator: NO

Drafter: traderc

May Contact:

Alt. Drafters:

Subject: **Agriculture - animals**
Memorials - Congress to

Extra Copies:

Pre Topic:

No specific pre topic given

Topic:

Ask Congress to support legislation concerning inspection of meat from ratites

Instructions:

See Attached

Drafting History:

<u>Vers.</u>	<u>Drafted</u>	<u>Reviewed</u>	<u>Typed</u>	<u>Proofed</u>	<u>Submitted</u>	<u>Jacketed</u>	<u>Required</u>
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/1			hhagen 02/07/2000	_____	lrb_docadmin 02/07/2000	lrb_docadmin 02/24/2000	

FE Sent For:

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FE Sent For:

<END>

Glenn Grothman

STATE REPRESENTATIVE

59TH ASSEMBLY DISTRICT

- For your information
- In response to your request
- Please comment after you have reviewed these materials.

Thank you -

This group contacted me as an organization stating the growing popularity of this meat product & the need to P interstate commerce. This bill is an important step in the process for their growing business. Most all of these people are small "family" farms!

Room 125 West, State Capitol
Post Office Box 8952
Madison, Wisconsin 53708

Office: (608) 264-8486
Home: (414) 338 8061

*Shelley,
Glenn*



LAPLANT EMU FARM
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www.emuitems.com
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NUMBER CALLED: 608-282-3659 DATE 1/18/00TIME: 1:45 PM TO ScottFROM: Marion Laplant NUMBER OF PAGES: 3ANY QUESTIONS, PLEASE CALL: 262-692-2975 - Home

AT: (414) 444-4453 - office

Thanks for your continued interest.
The support is greatly appreciated!

Tri-State Emu Report

Legislative update - HR 765 S1133

25 Oct 1999

New co-sponsors from CA, MS & MT
Good going folks!

65 Co-sponsors for H. R. 765
(up from 64, a new one this morning from CA)

Below is a listing by state of the
current co-sponsors:

1. Earl F. Hillard (D-AL) 4/28/99
2. Sonny Callahan (R-AL) 10/19/99
3. Aea Hutchinson (R-AR) 10/19/99
4. Jay Dickey (R-AR) 4/13/99
5. Jim Kolbe (R-AZ) 5/13/99
6. Bob Stump (R-AZ) 3/24/99
7. Ed Pastor (D-AZ) 4/20/99
8. Zoe Lofgren (D-CA) 4/28/99
9. George Radanovich (R-CA)
10. Bob Schaffer (R-CO) 6/8/99
11. Joel Hefley (R-CO) 9/14/99
12. Corrine Brown (D-FL) 10/19/99
13. Stanford D. Bishop (D-GA) 2/12/99
14. Saxby Chambliss (R-GA) 6/8/99
15. Nathan Deal (R-GA) 7/11/99
16. John Lewis (D-GA) 9/27/99
17. Jim Nussle (R-IA) 9/27/99
18. Helen Chenoweth (R-ID) 4/20/99
19. Michael K. Simpson (R-ID) 10/19/99
20. Jarry F. Costello (D-IL) 9/24/99
21. David D. Phelps (D-IL) 5/5/99
22. John Hostetler (R-IN) 4/13/99
23. Dennis Moore (D-KS) 4/20/99
24. Jerry Moran (R-KS) 4/20/99
25. Jim Ryan (R-KS) 9/27/99
26. Ann Northup (R-KY) 10/19/99
27. Edward Whitfield (R-KY) 10/19/99
28. Albert Russell Wynn (D-MD) 5/5/99
29. Wayne T. Christ (R-MO) 5/5/99
30. David Minge (D-MN) 4/13/99
31. Jim Oberstar (D-MN) 9/8/99
32. Jo Ann Emerson (R-MO) 9/8/99
33. Roy Blunt (R-MO) 10/19/99
34. Bennie Thompson (D-MS) original Co-sponsor
35. Ronnie Shows (D-MS) 2/12/99
36. Charles (Chip) Pickering (R-MS) 3/24/99
37. Bob Ehrlich (D-NC) 3/24/99
38. Earl Pomeroy (D-ND) 9/8/99
39. Bill Pascrell, Jr. (D-NJ) 7/20/99
40. Ted Strickland (D-OH) 7/20/99
41. James A. Traficant (D-OH) 3/24/99
42. J. C. Watts (R-OK) 7/13/99
43. Earl Blumenauer (D-OR) 3/24/99
44. James E. Clyburn (D-SC) 5/5/99
45. Floyd Spence (R-SC) 9/14/99
46. Van Hilleary (R-TN) 5/5/99
47. Ed Bryant (R-TN) 6/30/99
48. Bart Gordon (D-TN) 6/30/99
49. Bob Clement (D-TN) 6/24/99
50. John Duncan (R-TN) 6/30/99
51. Harold Ford (D-TN) 7/20/99
52. Zach Wamp (R-TN) 9/14/99
53. William Jenkins (R-TN) 9/8/99
54. Pete Sessions (R-TX) 3/24/99
55. Ruben Hinojosa (D-TX) 4/13/99
56. Jim Turner (D-TX) 4/20/99

17

57. Ken Bentsen (D-TX) 9/8/99
58. Owen B. Pickett (D-VA) 10/19/99
59. Virgil H. Goode (D-VA) 4/28/99
60. Frank Wolf (R-VA) 9/14/99
61. Jack Metcalf (R-WA) 4/28/99
62. George R. Nethercutt, Jr. (R-WA) 3/24/99
63. Jennifer Dunn (R-WA) 5/5/99
64. Brian Baird (D-WA) 5/5/99
65. Doc Hastings (R-WA)

17 Co-sponsors for S 1133, up from 15 (New from MS & MT)
S 1133 Co-sponsors listed by State:

1. Jeff Sessions (R-AL) 10/6/99
2. Max Cleland (D-Ga) 9/14/99
3. Larry E. Craig (R-ID) 9/23/99
4. Michael D. Crapo (R-ID) 9/23/99
5. Sam Brownback (R-KS) 9/29/99
6. Rod Grams (R-MN) original co-sponsor
7. Paul Wellstone (D-MN) 9/23/99
8. Thed Cochran (R-MS) 10/21/99
9. Conrad R. Burns (R-MT) 10/21/99
10. Jesse Helms (R-NC) 9/14/99
11. J. Robert Kerry (D-NE) 9/29/99
12. Kent Conrad (D-ND) 8/29/99
13. Byron L. Dorgan (D-ND) 7/26/99
14. Strom Thurmond (R-SC) 9/29/99
15. Bill Frist (R-TN) 7/26/99
16. Patty Murray (D-WA) 10/1/99
17. Slade Gorton (R-WA) 10/14/99

Old Legislative Updates - what's been happening the last couple of months

8 Sep 1999 Myra Charleston

Congress is now back in session and we have had an upsurge in co-sponsors for both H. R. 765 and S 1133. This is due to YOUR efforts and the efforts of the AEA BOD and State Presidents who have been making telephone contact with these legislators. We expect to have more names added to this list by the end of the week. (****and we now have 50 co-sponsors since this message.)

While I am sure that other ratite organizations have been actively pushing this legislation, I am bragging on AEA because I am a member, volunteer and actively involved with AEA, so I know what we have been doing. I am not familiar with the extent of AOA or NARA's efforts so if anyone from those organizations can give us an update on their organization's efforts, we would appreciate it. Hop in here guys!

For newcomers to the lists, these bills amend the Poultry Products Inspection Act of 1968 to include Ratites raised for human consumption. Passage of these bills will push the ratite industry into mainstream agriculture and open up a whole new set of opportunities for us.

7

FOR IMMEDIATE RELEASE

American Farm Bureau Supports Leveling the Playing Field for Ratites

In a bold move to support ratite (emu, ostrich and rhea) farmers, the American Farm Bureau recently announced public endorsement of pending federal legislation that would make the meat inspection process more equitable. Ratites are currently inspected under a voluntary fee-for-service inspection program resulting in additional costs and higher priced meats.

Congressman Bennie Thompson (D-MO) has introduced legislation in the US House of Representatives that would reclassify ratites and force mandatory inspection. This would eliminate the costly fees associated with processing that other meat producing industries do not pay. Rod Grams (R-MN) has introduced similar legislation into the Senate. There are currently 50 cosponsors for the House legislation and five for the senate bill. Cosponsors from Georgia include Nathan Deal, Sanford Bishop, Saxby Chambliss and Max Cleland. Passage of this legislation would mean more affordable prices for the millions of people who enjoy ratite meat, but find it expensive.

"Farm Bureau represents all walks of agriculture and supports the level playing field for the ratite industry with regard to mandatory meat inspection. Farm Bureau supports S. 1133 and H.R. 765," said Caroline Anderson, Director of Governmental Affairs for American Farm Bureau.

In addition to their statement, the American Farm Bureau sent out letters of endorsement on August 27, 1999 to the members of the Senate and House Agriculture Committees. The House bill is currently in the subcommittee for Livestock and Horticulture, and the industry is appealing to Congressmen Richard Pombo (R-CA), Chairman, for a public hearing.

"The industry simply cannot compete in pricing strategies," said Margaret Pounder, President of the American Emu Association. "Ratite meat is a red meat that is low in fat and high in protein and it does not really compete with other meats. It appeals to health conscious consumers who are already not eating beef and tired of chicken. But we have to get the cost of production down if we are going to create sustainable markets."

American Emu Association
(AEA)

Legislative Committee Chairman

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WIEA

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NUMBER CALLED: 608-282-3659 DATE 1/19/00

TIME: 12:15 Pm TO Scott

FROM: Marian LaPlant NUMBER OF PAGES: 5

ANY QUESTIONS, PLEASE CALL: _____

AT: (414) 444-4453 - Jim at this phone #

Scott: I didn't have this article yesterday. Perhaps it will be of interest to you & Glenn. Please contact us with any suggestions to help gain Wisconsin support.

Thanks
Marian

New Arsenal for Mandatory Inspection for Ratite

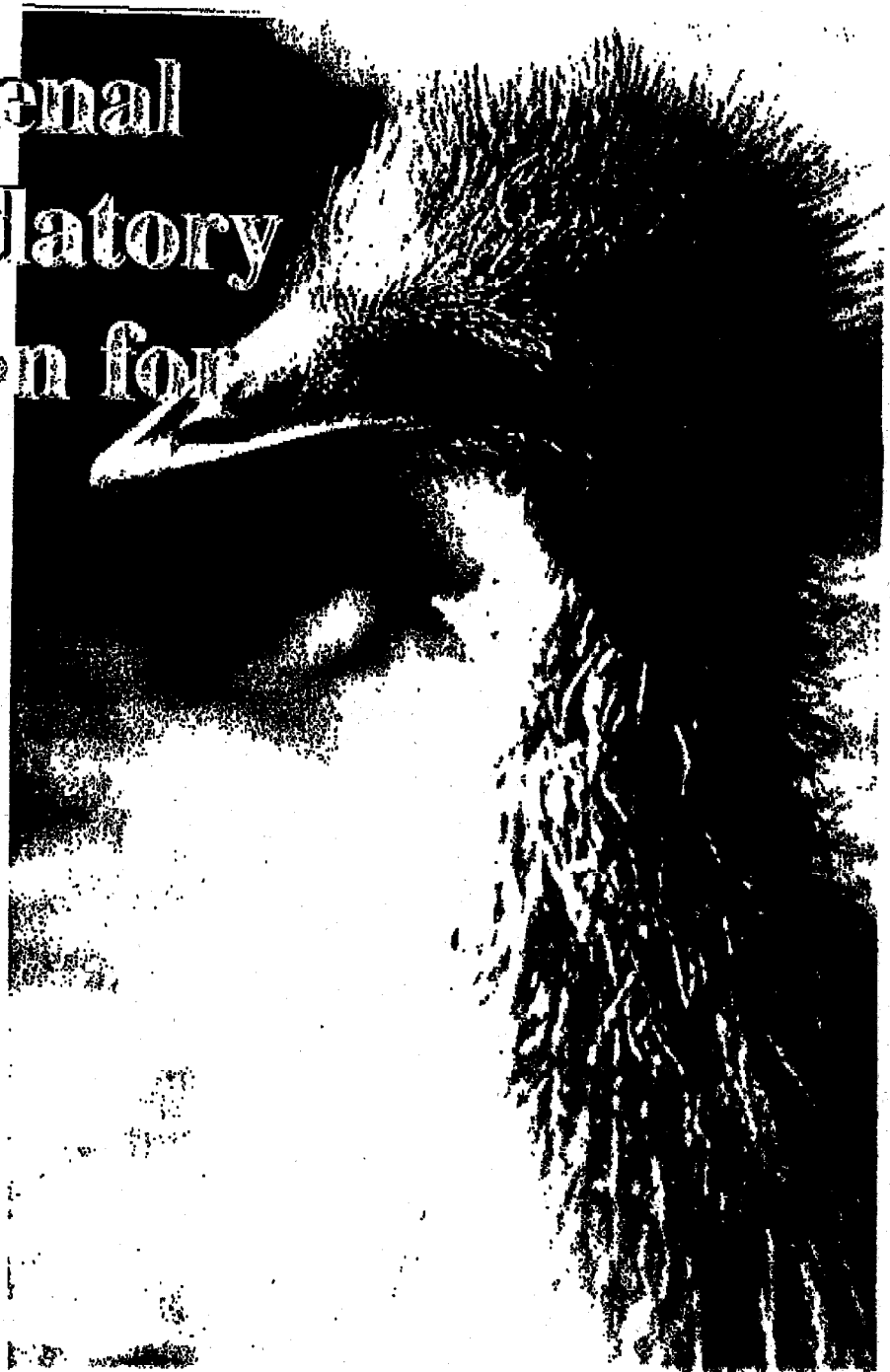
Jeanne Summerour of Summerour Farms in Dawsonville, Georgia has served as the past Georgia Emu Association President and American Emu Association Vice President and Region 2 Director. Summerour is recognized for her efforts at spearheading several industry efforts, including obtaining Mandatory Inspection for ratites.

Summerour attended the National Advisory Committee on Meat and Poultry Inspection Meeting on November 3rd and 4th, 1999 in Washington, D.C.

Following, Summerour shares some comments on the meeting, on the emu industry in general, and how emu farmers can actively support new developments stemming from the meeting:

The American Emu Association remains committed to the pursuit of legislation that will generate profits for the emu farmer. Without their support and financial contribution, I don't think the ratite industry would have a chance. We need a regular presence in Washington, and we must remain abreast of the issues that affect our industry.

The legislative process is long and arduous at best and complicated and convoluted at worst. Our situation has gone from possible to probable and now it is up to us, the growers, to make it a



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sure bet. The pieces are now in place to obtain mandatory inspection in the year 2000 and we must continue the uphill battle.

The National Advisory Committee on Meat and Poultry Inspection (NACMPI) is a federally sanctioned body that serves to provide direction on food safety

Inside Industry

issues. Their meetings are very formal and their only charter is food safety. But you have to look at all the peripheral agriculture issues that are related to food safety. One of those is the interstate shipment of state inspected meat.

My comment would imply that state inspected meat is in some way less safe, which it most certainly is not.

But USDA has created this perception that if it is not USDA inspected, well frankly it's just not as good, and that is not true. The original action on interstate shipment of state inspected meat started two and a half years ago.

While I was at this meeting, the day before a letter had gone from USDA Secretary Dan Glickman to Al Gore, recommending that they revise the Meat and Poultry Inspection act to allow interstate shipment of state inspected products. This is incredibly important to our industry. The reason that it's so important to us is that under the current mandatory inspection system, state inspected meat cannot be shipped through interstate or international commerce.

We would not want mandatory inspection only to find out that we were weakening our marketing potential. The NACMPI, a year and a half ago, asked Food Safety and Inspection Service (FSIS) about USDA Mandatory Inspection for all meat raised for human consumption. And FSIS presented a white paper in May 1999 that in my opinion was FSIS's way of not actually taking any action but still complying with the committee's request. The paper discussed the complications involved in defining meat, tissue, edible,

inedible, etc. and forced the committee to further narrow their request and allowed USDA to further delay.

Discussion Paper Shows FSIS Support

Well, what came out at this meeting was FSIS presented another white paper called a discussion draft to committee on Mandatory Inspection for all animals. The paper

This is going to come up before Congress as an administrative bill and is supported by FSIS-USDA. They are currently looking for a Senate sponsor to introduce the bill and it is expected to pass in 2000. This piece of the puzzle will already be in place when our petition is granted so interstate commerce will not be an issue.

The most fantastic thing of all, was that after subcommittee discussion and full committee input, the committee did come out with a formal recommendation.

This sounds more simplistic than it really is because the draft presented by FSIS included a list of considerations before a species should be included. And the committee agreed to it. Of interest is that a bill was introduced on the first day of the committee meeting for Mandatory Inspection of squab (pigeon - a specialty in Europe). That's good for the emu industry, because that means that right now there are

three bills before Congress petitioning for inclusion in the Mandatory Inspection program: one for rabbits, one for squab, and one for ratites.

New Statement for Arsenal

But what's really big here is the look at what we now have in our arsenal - we have a statement from USDA-FSIS that reads, "FSIS has given careful consideration to NAC-NPI's (the committee's) recommendation and it is in agreement that additional species such as ratites, quail, and squab, should be added to those currently under Mandatory Inspection in order to be consistent with the USDA vision of a public health risk base seamless Federal-State

"The legislative process is long and arduous at best and complicated and convoluted at worst. Our situation has gone from possible to probable and now it is up to us, the growers, to make it a sure bet. The pieces are now in place to obtain mandatory inspection in the year 2000 and we must continue the uphill battle."
Jeanne Summerour

says that FSIS supports Mandatory Inspection for certain animals.

Thomas Billy, who is the director of FSIS, was very quick to say that all of the pieces are in place, and because of this series of events, it should not affect us one way or the other. We assume that this interstate shipment bill will go through and it will.

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<http://www.webcom.com/777/npn.html>

inspection system."

"Seamless" is the new word for meat inspection system, meaning that there's no crack in it.

Additionally, we have a statement from NACMPI that reads in part, "Due to public health risks, we are in favor of mandatory inspection of non-amenable species (non-amenable has the same public health risks as amenable species.) These are very strong statements and, even better than that, we also know we have the support of the consumer groups. Groups like Safe Tables Our Priority (STOP) are very powerful and have a very powerful voice.

The Criteria

Understand that the recommendation passed by this committee says: "Species to be made amenable must meet criteria outlined in Dr. Post's paper." The criteria are:

1. The animal and its products are used for human consumption
2. There is microbiological risk
3. There is scientific evidence linking new species to human illness
4. The sufficiency of market
5. Compatibility with the FSIS inspection system, and
6. Cost.

Numbers one through three are not a problem because meat and meat products by their very nature pose an inherent risk, but number four could be an issue. They did a survey this past July of both Federal and State plants to determine the number of birds going through. If they redo the survey, we could be in trouble.

Regarding number five, one of the problems you have is that in this paper they have made the statement: "On the other hand, ratites present a slightly different issue in that their size prevents utilization of standard, automated poultry line."

They did not mention the fact that we process in red meat facilities. That did come out in the subcommittee meeting... so that basically said "that's not an issue, go away." But I think as an industry we need to remember that. That just because they've made all these

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4. The sufficiency of market
5. Compatibility with the FSIS inspection system, and
6. Cost.

recommendations, FSIS still has a lot of loop holes.

And then there's cost. While this committee is focused totally on food

safety, if it is cost-prohibitive for a market that doesn't exist, and there are only limited funds, they are going to recommend those items that will make the biggest impact on the food chain. If we wait for the National Advisory committee on meat and poultry inspection, in conjunction with FSIS to do this, we are probably looking at five years. So we need to continue the path we're on by getting legislation. So we cannot get complacent is the bottom line.

What the Emu Farmer Can Do



What we have now is very strong ammunition to go back to Congressmen and Senators and say, "You said you didn't support this because you said it costs too much money." Well, here's the recommendation from FSIS, here's the recommendation from the



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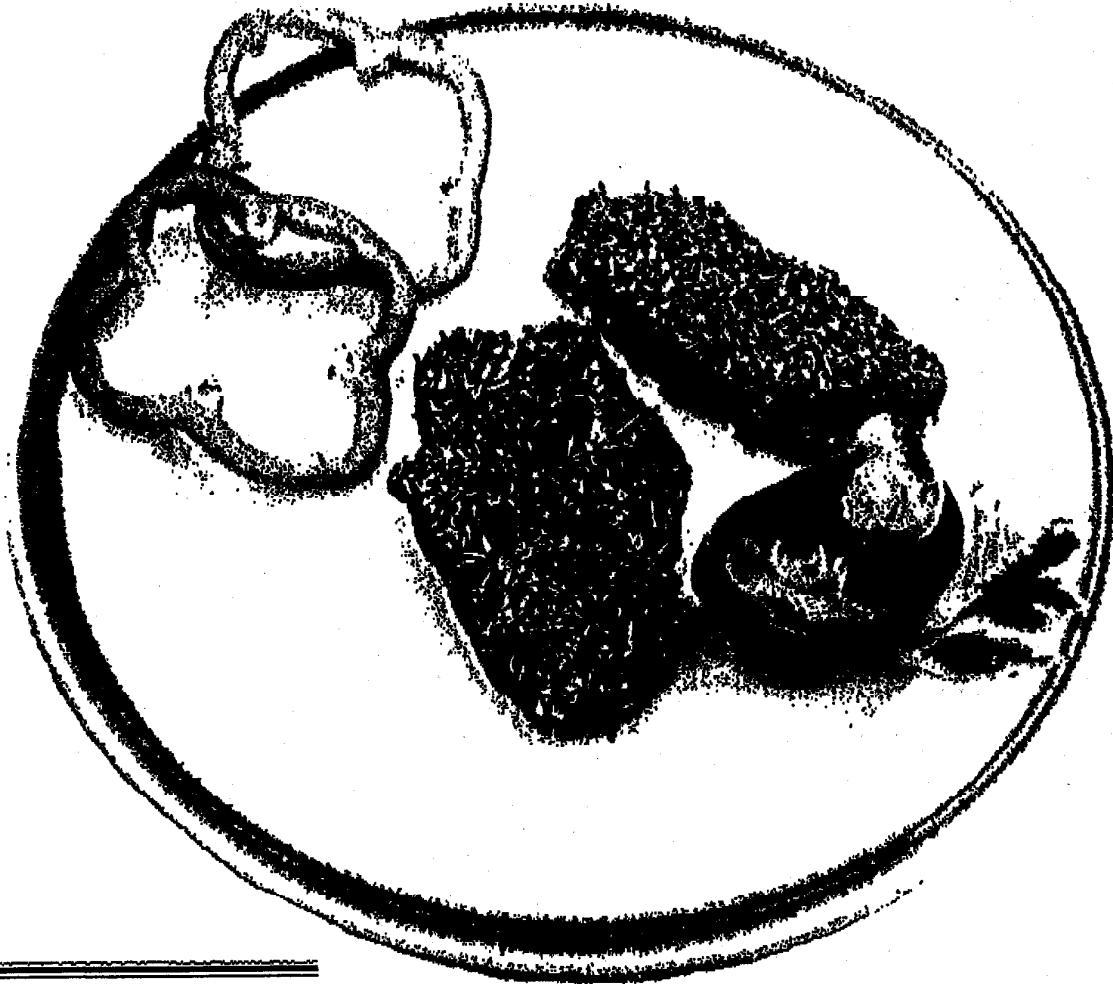
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RECIPE OF THE MONTH

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National Advisory Committee, we're going to get it anyway."

"The question is not whether we are going to get it, but rather whether we're going to get it this year, in three years, or in five years. And meanwhile, your constituents in this state are looking for your support to get this through now, because we are not looking at it as much as a food safety issue - we're looking at it as a commerce issue. It impedes our ability to market the products when you have the additional costs."

Go out and talk to your Representatives and Senators. We need more cosponsors.

- 2 emu fan fillets
- 1 green pepper, sliced
- 1 roma tomato
- Sm. can of sliced mushrooms
- basil
- flavored cooking wine

Slice fan fillets in half horizontally, so that you end up with four flat pieces of steak. Place steak in a dish or bag with wine and leave overnight in refrigerator. Remove steaks from wine and place on hot grill for one to two minutes each side, being careful not to overcook. Remove steak from grill and sprinkle basil on top. Serve with sliced green pepper, mushrooms and tomato. Serves 2.





Assemblyman Glenn Grothman
P.O. Box 8952
Madison, WI 53708

February 1, 2000

Dear Sir,

Enclosed is the information you requested regarding the ratite industry's quest for mandatory USDA inspection. I apologize for getting this to you so late, but volunteers run the organization and I have been ill.

Mandatory inspection will lower the cost to the farmer and make the meat more marketable by making it more affordable. We appreciate your support and anything you can do to further our efforts. Please contact me at (706) 265-1342 should you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeanne Summerour", written in a cursive style.

Jeanne Summerour
Legislative Committee
Chairperson

Post Office Box 740814 • Dallas, Texas 75374-0814 • Telephone 214/559-AEA1 • Fax
214/528-2359

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August 27, 1999 Sent to the Senate Ag Committee (except current cosponsors)

The Honorable Richard G. Lugar, Chairman
Senate Agriculture Committee
328 Russell Senate Office Building
Washington, DC 20515

Dear Chairman Lugar:

The American Farm Bureau Federation supports S. 1133 which would amend the Poultry Products Inspection Act and call for mandatory USDA inspection of ostriches, emus and rheas that are raised for human food. We ask that you cosponsor S. 1133.

There are numerous benefits that would be realized by allowing mandatory inspection of ratite meat such as the elimination of the costly voluntary inspections currently paid by the industry. The ratite industry has had voluntary inspection available since 1994. In many cases, producers are paying an hourly inspection fee in facilities that already have a full-time USDA inspector assigned. It is not equitable for the Food Safety Inspection Service to provide mandatory inspection for some meat and not others.

Another benefit is the potential for enhanced marketability of ratite products because of greater consumer familiarity with and confidence in the federal inspection program. The majority of facilities that process ratites under the voluntary inspection program also process mandatory inspected meats such as beef and pork. These plants must be in compliance with HACCP by the year 2000. The USDA stamp implies safety and quality and it is the responsibility of USDA to promote food safety whether the meat is inspected under the voluntary or mandatory program.

Farm Bureau asks that you cosponsor S. 1133 to allow mandatory inspection of ratites raised for human consumption.

Sincerely,


Dean Kleckner
President

Inspection Methods Standing Sub-Committee
Monday, November 08, 1999
National Advisory Committee on Meat and Poultry Inspection
Inspection Methods Standing Sub-Committee (Updated)

Developments in the *Campylobacter* Program

Recommendation:

- Write a letter to the NACMCF to readdress *Campylobacter* issue.
- Based on the knowledge of the organism – what mechanisms/interventions are available to reduce the prevalence and level on poultry and swine carcasses.
- Put *Campylobacter* issues on agenda for the next meeting.

Extending USDA's Meat and Poultry Inspection Program to Additional Species

Recommendation:

- Due to public health risks, we are in favor of mandatory inspection of non-amenable species (non-amenable have the same public health risks as amenable species).
- Species to be made amenable must meet criteria outlined in Dr. Post's paper.
- Have Dr. Post amend his document with more detail: addressing the need for public health data and microbiological testing, considering budgetary concerns, and assuring accessibility of product in interstate and international commerce.
- Will non-amenable species be allowed to use nitrites upon becoming amenable?
Nitrites issue to be addressed and resolved before next meeting.
- Dr. Post will report back on progress on paper's completion at next meeting
- Dr. Post anticipates the paper's completion in a year's time.



Georgia Department of Agriculture

Capitol Square • Atlanta, Georgia 30334-4201

Tommy Irvin
Commissioner

May 11, 1999

Dear

I am writing to ask your support for H. R. 765, which amends the 1968 Poultry Products Inspection Act and mandates USDA inspection of ratites (ostrich, emu, and rhea). My colleagues in the National Association of State Departments of Agriculture and I promoted this resolution and it has been introduced by Congressman Bennie Thompson of Mississippi. I understand that Congressman Sanford Bishop and twenty-four others have co-sponsored the resolution and is being reviewed by the House Agricultural Subcommittee on Livestock and Horticulture.

As the state official responsible for food safety in Georgia, I believe that meat inspection is a food safety issue and should be the public health responsibility of government. Our consumers deserve the protection of mandatory inspection for all animals raised for human consumption and the limited number of ratites being processed should not cause a budgetary burden for USDA.

Please help assist this entrepreneurial agribusiness through your support of H. R. 765.

Sincerely,

Tommy Irvin

Fact Sheet

- H.R. 765 was introduced by Congressman Bennie Thompson (D-MS)
- Currently 48 cosponsors for this bill
- Companion bill S 1133 was introduced by Rod Grams (R-MN) in the senate
- Currently 5 cosponsors including Jesse Helms (R-NC) and Max Cleland (D-GA)
- Both bills call for an amendment to the 1968 Poultry Products Inspection Act and would include ratites (ostrich, emu and rhea) under the mandatory USDA inspection program
- Both bills have received bipartisan support
- Cost of inspection, currently passed on to the farmer, can raise the price of the meat as much as \$2/pound which hampers market development
- American Farm Bureau sent letters of endorsement on 8/27/99 to members of the Senate and House Ag Committee
- Approved American Farm Bureau statement for press release: "Farm Bureau represents all walks of agriculture and supports leveling the playing field for the ratite industry with regard to mandatory meat inspection. Farm Bureau supports S. 1133 and H.R. 765."
- The House bill, 765, is currently in the subcommittee on Horticulture and Livestock and will see no movement until a hearing is granted (already requested by Congressman Thompson); Congressman Pombo (R-CA) has not granted the hearing
- The American public deserves to be able to eat healthy red meat at affordable prices and the ratite industry deserves to be heard
- 1.1 million ratites of which 25% are ostrich, 70% emu, 5% rhea
- 10,000 ratite producers of which, 25% are ostrich, 70% emu and 5% rhea
- 1600 members in ratite organizations
- Texas, Oklahoma, California and Arizona largest concentration of Ostrich
- Texas, Alabama, Mississippi, Tennessee largest concentration of Emu
- Kentucky, Indiana, Ohio largest concentration of Rhea



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POSITION STATEMENT

MEAT, POULTRY, EXOTIC AND AQUATIC FOOD INSPECTION REFORM

INTRODUCTION

The United States enjoys the safest meat and poultry supply in the world, not by accident but rather due to the current meat inspection laws. However, even this system that ensures the safest meat and poultry supply can become outdated and inefficient if it does not change as hazards change and technology improves. In order to meet today's demand for a meat and poultry supply that is safe from all hazards, including pathogens that cannot be detected by traditional means, it is evident that current meat and poultry inspection laws must be changed. Meat and poultry inspection reform should include the best available technology while retaining those parts of current meat and poultry inspection laws which have assured the United States public a safe supply of meat and poultry in the past. This includes careful organoleptic examination of animals and carcasses by trained professionals to detect disease, tumors and other neoplasms, inflammation, bruises, fractures, parasites, and injection sites. Animals affected by any of the many diseases transmissible to man such as tuberculosis, and animals with toxemia or septicemia can best be detected through sensory evaluation by a veterinarian during ante- and post-mortem examination. Less than continuous inspection by USDA inspectors at slaughter may be replaced by a plant inspection system, with government oversight, for lots of animals that were raised under an effective, well documented quality assurance program for production. However, once passed for food, meat and poultry and meat and poultry food products can be produced safely through cooperative efforts of the producer and the government utilizing scientific inspection systems such as the Hazard Analysis Critical Control Points (HACCP) system rather than continuous organoleptic inspection.

The new inspection system should be authorized by a single law calling for mandatory science-based inspection at all levels of production of all species whose flesh is used for food, including meat, poultry, exotic (species currently non-amendable to the inspection acts, such as deer, rabbit, buffalo, ostrich, etc.), and aquatic animals. Retail and restaurant operations have evolved and today are conducting complex processing with little, and in some cases no, regulatory oversight. Some of those processes include grinding, curing, smoking, vacuum packaging, and distribution of meat and poultry products. These processes have the potential to pose significant risks to the consumer.

Any change in meat and poultry inspection should consider all businesses in the meat manufacturing arena. Risk assessments in all areas from farm to table should be accomplished and inspection resources allotted respective to the amount of risk to the consumer based on the type of process and product rather than the type of distribution system, i.e. retail or wholesale.

The public should be confident in their belief that all flesh food (meat, poultry, exotic, and aquatic) offered for sale or prepared for consumption has been prepared under an effective inspection system. The new system should replace the outdated ineffective parts of the current law while preserving the effective parts; however, care must be taken that new programs are not layered on current programs. More inspection is not necessarily more effective or better. The new system should call for a cooperative effort of the manufacturer, appropriate state official, and the Secretary, and should give the Secretary enforcement authority in the form of civil penalties and the ability to deny inspection when producers fail to fulfill their responsibility for safe meat production.

It is equally important that the public know that with current technology it is impossible to guarantee a meat supply that is free of microbes; therefore, the consumer, an important link in preventing food borne illnesses related to meat products, must be provided with continuous educational information regarding safe food handling.

RISK BASED INSPECTION SYSTEM

Modernization of the nation's meat and poultry inspection system must be based on the principal idea of reducing the risks of foodborne disease to American consumers. The inspection program should provide oversight that focuses on prevention of food safety hazards. The meat, poultry, exotic, and aquatic food industries should assume responsibility for identifying and controlling hazards that pose a significant risk to public health. Risk based inspection will lead to overall safer products and help contain government costs because scarce federal inspection resources would be redirected from low-risk operations to areas that may need greater coverage because they present a higher risk potential. Governmental resources can then more efficiently be directed at ensuring that the hazard control procedures achieve the program's objective through monitoring and verification of the industry's activities.

The inspection system should include all facets of meat, poultry, exotic, and aquatic animal production from the farm to the consumer. The risks of foodborne disease may be reduced by incorporating HACCP principles into all phases of food production. HACCP plans developed by producers, slaughterers, processors, retailers, and restaurants will assess the risks at all levels of production and introduce steps at each of these levels to reduce the possibility of foodborne disease.

These HACCP plans must be unique for each operation. Critical control points should be identified, critical limits established, and corrective action procedures developed for processes that are outside of acceptable limits. These plans must be reviewed and updated on a regular basis. Flexibility is necessary in preparation and implementation of these plans. The Secretary and state meat inspection agencies will monitor the overall effectiveness of these industry plans. A sincere sense of cooperation and collaboration between the industry and the government is essential for a successful risk-based inspection system.

Microbiological testing, as necessary to verify the effectiveness of an establishment's procedures for controlling microbiological hazards, should be an integral part of the risk-based system. This testing should be done to determine if the process is in control and not attempt to establish microbiological standards. The frequency of testing required should be proportional to production volume and not based on a calendar schedule.

A significant difference exists between microbiological testing in raw and ready-to-eat foods. Science and technology indicate that it is currently impossible to insure that raw meats and poultry are free of potential pathogens. As a result, microbiological testing of raw meat and poultry for other than informational

purposes and verification of HACCP systems is inappropriate. Microbiological testing in ready-to-eat foods is appropriate and should continue to be mandatory.

General guidelines to assist establishments in HACCP plan development should be available. If the Secretary concludes that a plan is not effective or that the establishment is not operating in accordance with it, intervention by USDA would be required. This would include increased verification testing, as well as provisions for product disposition.

HACCP Plans (The 7 Basic Steps)

A HACCP system involves determining points along the food production chain where contamination can occur. Safeguards are then developed for these critical control points to prevent food safety hazards. Records are kept at all points to make it possible to trace any problems to their origin. The main value of a HACCP system is prevention rather than detection. HACCP systems vary for all foods, but seven basic principles are universal:

- All potential hazards associated with producing a particular food product are assessed, including growing and harvesting of a product with attention to all raw materials or additional ingredients used. This assessment includes the processing, manufacturing, distribution, marketing, and preparation for consumption of the food.
- Critical points required to control the identified hazards are determined.
- Standards (critical limits) that must be met at each critical control point are established.
- Procedures for monitoring the critical control points are established.
- Corrective action plans are developed to be implemented when a deviation is identified.
- Record-keeping systems that document the HACCP plan are established.
- Procedures to verify if the HACCP plan is working correctly are established.

All meat and poultry production businesses should be required to prepare a HACCP plan specific to their operation. Identification of critical control points and corrective actions will be established. The plans will be updated and improved continuously. The primary focus of these plans is to control and reduce the risk of foodborne disease. Plant operators and government officials will continually evaluate and verify the effectiveness of these plans and changes will be made as necessary.

The production of wholesome food for American consumers is a cooperative effort between the food industry and governmental agencies. In order to be successful, a sincere spirit of cooperation between the food industry and the government is essential. HACCP plans will identify critical control areas in food production processes and plant monitoring and documentation requirements. Government inspectors will verify the overall effectiveness of these plans. The ultimate goal of both the industry and the government should be the production of wholesome, unadulterated food products and decisions regarding the processes involved must be directed toward attainment of that goal.

The incorporation of HACCP plans into the industry must change the way the Secretary allocates resources for inspection. The requirement of HACCP plans can not be in addition to the current continuous inspection system. The incorporation of HACCP into the industry must replace the current continuous inspection

system. In order to provide adequate utilization of current resources, risk assessments must be made in all segments of meat, poultry, exotic, and aquatic food production. The Secretary must reevaluate the current continuous inspection program and allocate resources in areas where significant risks to consumers can be reduced.

PREHARVEST FOOD SAFETY

Preharvest food safety means those activities conducted by food animal producers, at all levels of production, that prevent or reduce the occurrence of organisms, agents or conditions that pose an animal health or food safety risk.

NASDA supports the implementation of HACCP at all levels of food production, from "farm-to-fork." However, insufficient science-based preharvest epidemiologic and ecologic information exists for the foodborne pathogens of concern to make it possible to have a mandatory preharvest HACCP program. Such information is essential for the recognition of critical control points, identification and implementation of effective diagnostic, control and intervention strategies. Because of these inadequacies, HACCP at the preharvest segment of food production should not be a mandatory requirement, but encouraged.

Preharvest activities should be conducted through voluntary, producer-driven, risk-based quality assurance programs. Quality assurance programs should be developed for each industry and each segment of production through a coordinated, cooperative effort of producers, producer organizations, veterinary practitioners, state agencies concerned with animal and human health, universities, and appropriate federal agencies. Many national and state producer organizations already have quality assurance programs in place that could logically become acceptable preharvest food safety programs. The Secretary should work with producers through voluntary quality assurance programs to reduce or eliminate potential foodborne pathogens.

Preharvest quality assurance programs should identify diseases, conditions, chemical agents, and microorganisms of concern to food safety. They should also identify research needs so necessary epidemiological and ecological data can be generated that will identify risk factors, diagnostic procedures, critical control points and intervention strategies. Intervention strategies should be incorporated into quality assurance programs as appropriate, by identifying cost-effective, result-oriented strategies. Effective preharvest intervention strategies may never be available for some microorganisms, especially those present in a wide range of animal host species, man and in the environment.

An effective preharvest quality assurance program should contain a feedback loop whereby food producers and food processors share relevant information on disease agents and disease incidences, diagnostic procedures and intervention strategies. The various segments of the industries can work together through an effective quality assurance program to identify and implement effective intervention strategies to achieve a safer food supply for consumers.

The Secretary should have some oversight of preharvest activities and authority to trace disease agents through all points of production to the place of origin, or at least to the last point of production. In order to make such tracing of organisms and agents possible, the Secretary should have the authority to require appropriate identification of individual animals or lots of animals. Much of the necessary animal identification requirements and traceback authorities are already available through existing livestock disease control programs but should be expanded to allow traceback of animals that are inapparent carriers of agents that are a food safety concern.

Traceback of animals that are inapparent carriers of potential human pathogens should be for the purpose of developing ecological, epidemiological, diagnostic and intervention information and strategies. Quarantine of farms, however, is inappropriate for potential food borne pathogens that have a number of host species, are found in the environment, and for which there are no effective preharvest diagnostic procedures or intervention strategies. Should quarantine authority become necessary it should continue to reside with state animal health agencies. Most state animal health agencies already have ample quarantine authority to deal with human pathogens of animal origin.

Through cooperative efforts of the Secretary and livestock producers, an efficient, cost effective, science-based, risk-based program can be developed and implemented that will further enhance the safety of an already safe, wholesome food supply.

HARVEST

Harvest activities include the conversion process from a live animal to a carcass. The law should require that facilities develop and implement written HACCP plans which identify and control public health hazards during harvest. The plan should encompass ante-mortem and post-mortem procedures in addition to other identified critical control points (i.e. dressing procedures, sanitation, facility requirements, etc.). Once a facility's plan has been satisfactorily implemented, the Secretary should focus efforts on verifying the effectiveness of the facility's plan and the facility's compliance with it. The intensity of government oversight should depend upon many factors including the risks presented by particular products and slaughter operations, the effectiveness of a facility's plan, and each facility's compliance with the plan. In facilities that slaughter a uniform, high quality animal, produced under an effective, well documented quality assurance program, the Secretary should not be required to provide 100 percent evaluation of the animals for disease or aesthetic defects (organoleptic inspection). The facility should assume this responsibility as a part of its HACCP plan. A HACCP system developed and implemented by the establishment which could include government verification and minimal inspection oversight would be superior to continuous organoleptic inspection used alone. Facilities harvesting animals that are not uniform and/or of high quality or originate from farms that do not have an effective quality assurance program should still be subject to 100 percent evaluation of animals by the Secretary for disease or aesthetic defects.

POST HARVEST

Post harvest includes meat and poultry processing, further processing of products at wholesale, retail, restaurants and other institutions and distribution of products in commerce.

The most significant reduction in risk of foodborne disease can be made by controlling the processes that occur during post harvest production. The steps that are taken to convert raw meat and poultry to ready to eat foods pose the most significant risks to consumers. These functions are conducted in meat and poultry processing plants, retail stores, restaurants and other institutions such as school cafeterias, prisons, and resident extended care facilities.

Mandatory HACCP plans should be required for all post harvest operations. Each facility, wholesale or retail producer, develops a HACCP plan to control, monitor, and verify the critical processes that are conducted in that operation. The plan must be designed specifically for that operation. Plant operators and plant employees are responsible for implementing these plans and taking control of the food production processes in their operations. The Secretary and states monitor and verify the effectiveness and implementation of those plans.

The last step before consumption is the food service and retail arena. This is the last opportunity to apply a "kill step" that could render harmless any pathogenic organisms that have survived previous HACCP controls. It is also, however, perhaps the greatest opportunity to introduce and incubate new pathogens to a product that was previously safe. This reintroduction and incubation can be accomplished through a myriad of critical control points such as cross contamination, improper refrigeration, inadequate cooking and holding, reheating, insanitary equipment and environment and lapses in personal hygiene.

It must be recognized that the food service and retail outlets provide one of the greatest hazards to public health. All HACCP controls prior to this point can be nullified by one inexperienced or undereducated kitchen or deli worker and it must be admitted that the percentage of such workers in the restaurant and retail industries is very significant.

It is essential, in face of this threat to public health, that HACCP programs (whose outlines are presently in the 1993 food code) be made mandatory in the food service and retail industries.

AMENABILITY

NASDA strongly supports an inspection system that is fair and equitable to all segments of the industry. The system must be based on risk, rather than the point of sale or origin of the product.

Traditionally, the Secretary has assumed authority over various segments of the meat and poultry industry based on the type of operations being conducted such as inspection at wholesale operations but not at retail operations. Inspection of the production of meat and poultry food products has been based on the amount of meat or poultry in a product and not on the potential risks of those products.

A more efficient and effective method of inspection would include a risk assessment of the food safety hazards associated with the type of product or processes involved in production. The percentage of meat or poultry in a product should not be the determining factor in a food safety program. The process used to control, monitor, and verify the production of that food is the most important consideration for consumers.

All flesh food, both traditional and non-traditional, aquatic and exotic animals, should be included in the inspection process. Many of the currently exempted items pose the same potential health risks as those presently mandated for inspection. With increased productivity, varying consumer preference, and the lack of a consistent nation-wide inspection program, exempting meat food products from inspection as is currently done under the present system cannot be justified. Seafood, for example, receiving basically no inspection, is often co-mingled with inspected meat products at retail points.

SMALL BUSINESS

This Country was founded on the entrepreneurial spirit of free enterprise. The country's economy depends on the success of industry. It is imperative to remember that, while this meat inspection reform is designed to better protect the American public, true free enterprise requires an environment that will allow new small businesses to develop and grow. The inspection law must provide an opportunity for small businesses to continue to operate successfully. Two ways that this can be assured is by establishing frequencies of verification tests, that are required by scientific inspection systems, based on production volume and risk rather than on the calendar and by encouraging state governments to maintain state inspection programs which are able to effectively regulate as well as help smaller businesses develop safer production systems.

STATE MEAT, POULTRY, AND AQUATIC FOOD INSPECTION PROGRAMS

State inspection programs are important partners of the federal inspection system. State inspection programs must be considered as equal partners providing inspection equal to USDA inspection, and as such, state-inspected meat products must be allowed in the same commerce as federally-inspected meat products. Other state inspected commodities, such as milk and dairy products, seafood, and vegetables, are allowed such access to commerce. State programs are organized in a way that allows them to deal with small business more effectively and efficiently than can a large federal system.

As mandated inspection moves toward a more modern scientifically-based inspection system, smaller businesses will need considerable guidance and training to change their production methods to comply with new inspection requirements. State inspection programs are better positioned to assist these smaller businesses in converting to operating under the new inspection system than the federal system. Failure of a business to operate under the new system will result in the business closing. A strong, well staffed Federal-State Relations Office will be required to assure consistent application of the new system.

Cooperative state programs are more economical because each state provides up to 50 percent of the financial support of the state program. Without state programs, the Secretary would be required to provide all inspection at full cost or cause smaller businesses to go out of business for lack of required inspection. In reforming the meat and poultry inspection laws it is imperative that significant costs are not added to the states for maintaining their programs and that state programs be authorized to assist small businesses establish HACCP programs for their operations. Costs of laboratory tests to verify effectiveness of production or scientifically based inspection systems, for example, can be devastating to a fragile state government budget. Therefore, when laboratory tests are required, states should be allowed to use USDA laboratories for such tests.

CONSUMER EDUCATION

The final control in any system of food safety rests with the consumer. The industry does not yet have the science and technology to produce a product that can be mishandled by consumers and still be safe. Observations in the United States and other countries have demonstrated that the incidence of foodborne illness can dramatically decline as a result of active public education and effective media coverage. The responsibility for educating consumers on appropriate food handling and cooking practices must be shared by government and industry. Educating and training producers at all levels, including livestock producers, slaughterers, processors, and food service handlers is also essential and should be enhanced.

Public education should include a general food safety program directed toward all consumers and target programs for those persons at high risk for foodborne illness. Consumer education should also provide information on technological advances, such as irradiation that can enhance the safety of the food supply, to promote wider consumer acceptance of such beneficial progress.

ADMINISTRATION

Broader enforcement authority needs to be given to USDA under the new system to ensure facilities are complying with their responsibilities. Methods of withholding inspection and inspectors from a facility as well as authority to propose administrative penalties against establishments that repeatedly fail to comply with the Secretary's requirements in a manner that poses a direct threat to public health or safety must be implemented. This would include provisions to prohibit an individual from exercising operational control or participating in the business operations of a facility when necessary to ensure compliance.

To avoid misunderstanding among all concerned, program changes need to be made through proper rule making and consultation through a standing Federal Advisory Committee composed of scientific, public health, state programs and industry representatives. This committee should be statutorily established to advise, review, evaluate and make recommendations to the Secretary in the implementation of the inspection program.

TRANSITION PERIOD

The development and implementation of scientifically based control procedures (HACCP) could take some time for facilities and a reasonable and realistic period of transition should be provided as follows:

- A HACCP Program shall be in place in three years.
- If a facility fails to implement a HACCP program after three years it would continue under the traditional inspection system for up to two more years but on a user fee basis.
- After the five year period is exhausted and facility is not under HACCP Program, inspection will be withdrawn.

Along with any new program, there is always a need for proper training and education. A comprehensive HACCP training and education program should be implemented at the federal, state, industry and consumer levels to enhance the knowledge and provide the necessary changes and new attitudes about meat and food safety that a good HACCP Program can provide.

Once the scientifically based HACCP Program is implemented, all new establishments (including exotics and seafood) must use the HACCP approach.

CONCLUSION

Significant reform of the nations flesh food inspection system is necessary to improve food safety. However, as important as food safety is, government cannot overlook the economic burden that the wrong reform would place on the tax payer and industry, particularly the small meat business operators throughout the country. NASDA cannot support any plan that restricts interstate shipment of product or causes unfair disadvantage to small business based on type of inspection (i.e., state vs. federal) or the size of the business.

CONCEPT PAPER ON
EXTENDING USDA'S INSPECTION PROGRAM TO ADDITIONAL SPECIES

Introduction

In November 1998, the National Advisory Committee on Meat and Poultry Inspection (NACMPI) recommended that the Food Safety and Inspection Service (FSIS) prepare a concept paper on the issue of mandatory inspection of all animal flesh foods. The goal of expanding the types of animal species required to be Federally inspected under the United States Department of Agriculture (USDA) inspection program would be to ensure that animal flesh foods, commercially slaughtered or processed for human consumption, are federally- or State-inspected for safety and wholesomeness.

At the May 1999 meeting of the NACMPI, a preliminary draft concept paper on mandatory inspection of all animal flesh foods was discussed. The Committee recommended the application of criteria for resolving the issue of what animals (and their products) should be involved in mandatory inspection.

FSIS has given careful consideration to the NACMPI's recommendations and is in agreement that additional species, such as ratites, quail, and squab, should be added to those currently under mandatory inspection in order to be consistent with the USDA vision of a public health risk-based, seamless Federal/State-inspection system. In response, a decision was made by the Agency to begin the process of exploring an expansion of the definition of amenable species. Although expansion of amenable poultry species may be possible without legislative change, such an expansion for meat will require amending the Federal Meat Inspection Act (FMIA) to add to the list of species under mandatory inspection.

This paper represents a first step in the process necessary to move toward a legislative proposal to amend the FMIA to add to the list of species under mandatory inspection. This paper presents a conceptual framework that can serve as the basis for determining which species of animals should be added to the list of those that are already amenable to USDA inspection. The conceptual framework is a starting point for further dialogue and prompts questions for which data are needed for a response. The paper presents the statutory and regulatory basis for mandatory and voluntary inspection, a public health rationale for considering additional species, a preliminary economic assessment of the costs and benefits of adding to the list of species under mandatory inspection, and a set of criteria to consider in making the decision as to which species should be added to the list.

Public participation in guiding the Agency in this initiative is also needed. The Agency is interested in the Committee's views and advice on the course of action on which it has decided to embark. The Agency needs additional data and information on the points raised in this paper and welcomes continued guidance from the Committee in its effort to develop a record to support legislative and regulatory changes.

Background

Statutory and Regulatory Authorities

Currently, statutory and regulatory provisions define the species of animals that are inspected by USDA under mandatory inspection and those that are under voluntary inspection. In certain instances, explicit exemptions from inspection exist, in addition to exemptions from the definitions of products that USDA inspects. States with inspection programs may also inspect the slaughter of animals and the preparation of the meat and poultry products from both amenable and non-amenable species.

FMIA/Meat Inspection Regulations

The FMIA mandates that USDA inspect cattle, sheep, swine, goats, horses, mules, and other equines, and the food products thereof, slaughtered and prepared in Federal establishments and foreign establishments exporting such products to the United States, that are intended for distribution in commerce (21 U.S.C. 601 et seq.). The Federal meat inspection regulations (9 CFR Subchapter A) implement the provisions of the FMIA. The Federal meat inspection regulations (9 CFR 301.2) define "livestock," "meat," and "meat food products" as being of cattle, sheep, swine, goat, horse, mule, or other equine origin.

The FMIA provides for exemptions from inspection of the slaughter of animals and the preparation of the carcasses, parts thereof, for meat, and meat food products at establishments conducting such operations for commerce when such products are exclusively used by an individual or households and, thus, are not sold. This provision is referred to as the custom operation exemption. The FMIA also provides an exemption from the definition of "meat food product" for products that contain meat or other portions of such carcasses only in a relatively small proportion or historically have not been considered by consumers as products of the meat food industry, and that can not be represented as meat food products.

The Federal meat inspection regulations (9 CFR Part 303) also address exemptions from the requirements of the FMIA with regard to inspection, including custom operations and products that are exempt from the definition of "meat food product."

PPIA/Poultry Products Inspection Regulations

The PPIA mandates that USDA inspect "poultry," i.e., any domesticated bird, and food products thereof, slaughtered and prepared in Federal establishments and foreign establishments for export to the United States that are intended for distribution in commerce (21 U.S.C. 451 et seq.). The Federal poultry products inspection regulations (9 CFR Part 381) implement the provisions of the PPIA. The Federal poultry products inspection regulations (9 CFR 381.1) define poultry as meaning any domesticated bird (chickens, turkeys, ducks, geese, or guineas), whether live or dead.

The PPIA also provides for exemptions from inspection of the slaughter of poultry and the preparation of poultry products, i.e., poultry carcasses or parts thereof. Among the exemptions, the PPIA provides for the exemption from inspection of the custom slaughter of poultry and the preparation of carcasses and parts thereof at establishments conducting such operations when such products are used exclusively by households and individuals and are not sold. Different than the provisions of the FMIA, the PPIA contains specific criteria for such exemptions based on the volume of poultry slaughtered or processed.

The PPIA also includes an exemption from the definition of "poultry product" for products that contain poultry ingredients only in a relatively small proportion or historically have not been considered by consumers as products of the poultry food industry, and that can not be represented as poultry products.

The Federal poultry products inspection regulations address exemptions from inspection, including an exemption from the definition of "poultry product" of certain human food products containing poultry, such as those containing less than 2 percent cooked poultry meat (9 CFR 381.15), and an exemption from inspection for custom operations (9 CFR 381.10).

Agricultural Marketing Act of 1946 (AMA)/Voluntary Inspection

The Agricultural Marketing Act of 1946 (AMA) (as amended) provides USDA with the authority to inspect, certify, and identify the class, quality, quantity, and condition of agricultural products (including food animal products) in interstate commerce on a voluntary, fee-for-service basis that covers program costs. The Secretary is also authorized to issue inspection regulations. The Secretary may deny AMA inspection services for failure to comply with regulatory requirements because of the lack of available inspectors or other administrative reasons.

USDA has published regulations for the voluntary inspection of rabbits (9 CFR Part 354) and the voluntary inspection of exotic animals (9 CFR Part 352). Rabbit is defined in 9 CFR 354.1(z) as any domesticated rabbit. Exotic animals are defined in 9 CFR 352.1(k) as any reindeer, elk, deer, antelope, water buffalo, or bison.

The Department has also promulgated regulations related to the voluntary inspection of poultry (9 CFR Part 362). The poultry subject to voluntary inspection regulations are defined in 9 CFR 362.1(d) as any migratory waterfowl, game bird, or squab.

USDA also provides voluntary inspection of ratites under guidelines that were published in November 1995. Ratites include ostrich, emu, and rhea.

The Food and Drug Administration (FDA) and Non-Amenable/Exotic Species

Non-amenable species and their products are not specifically addressed under the FMIA and PPIA, except with regard to voluntary inspection of exotic species. Only amenable species are defined in the Acts and implementing regulations. Therefore, there is a commonly held view that non-amenable species fall under the jurisdiction of the FDA in terms of inspection jurisdiction. Although the Federal Food, Drug, and Cosmetic Act (FFDCA), under which FDA operates, does not specifically address the issue of inspection oversight for any particular species of animal, the FFDCA does cover "food" in general. Thus, by default, the FFDCA and its regulations apply to the slaughter of non-amenable species and the preparation of their products.

State Inspection Programs

The FMIA and PPIA authorize the Secretary to cooperate with State agencies in developing and administering State meat inspection and poultry products inspection programs in any State that has enacted a State meat or poultry products inspection program law that imposes mandatory ante mortem and post mortem inspection, reinspection, and sanitation requirements that are at least equal to those under the provisions of the Acts. Under the Acts, establishments in a State with an approved inspection program may engage in the slaughter of animals and the preparation of their products for use as human food for distribution within the State. Currently, establishments under State inspection programs are prohibited from shipping their products interstate.

USDA cooperation with State agencies includes providing advisory assistance, technical and laboratory assistance, and financial aid for the administration of such programs. The Acts stipulate that the amount contributed to any State by the Secretary from Federal funds for any year shall not exceed 50 percent of the estimated total cost of the cooperative program, and the Federal funds are allocated among the States desiring to cooperate on an equitable basis. Currently, there are 25 States with approved inspection programs. Under State inspection laws and programs, both amenable and non-amenable (i.e., exotic species) may be inspected for slaughter and the preparation of the respective products for distribution within the State. In some instances, States may require inspection of certain animal species and their products for intrastate commerce, while others may require Federal inspection before any product can enter their State. If a State fails to develop or is not enforcing, with respect to all establishments within its jurisdiction, at which amenable species are slaughtered or prepared for use as human food solely for distribution within that State, requirements at least equal to those of the Acts,

the Secretary is empowered to designate such States as having to comply with the provisions of mandatory Federal inspection in the Acts. Such States are known as "designated States."

Production Estimates for Exotic Species

The species of animals slaughtered in Federal establishments under voluntary inspection, in 1998, are listed in Table 1, entitled *Non-Amenable Species Slaughtered in Federal Establishments Under Voluntary Inspection - 1998* (Table 1), which is appended to this paper. Table 2 (also appended to this paper) shows data for the production of non-amenable (and exotic) species under Federal and State inspection programs. In many cases, it appears that more non-amenable species of animals are slaughtered under State inspection programs, e.g., animals in the genus Cervidae (deer, reindeer, and elk), than at establishments under Federal inspection. The Tables do not account for non-amenable species slaughtered under custom operation exemption.

Public Health Issues and Implications

The Advisory Committee has not developed a list of animals that are potential candidates for mandatory inspection. However, FSIS regulations identify reindeer, elk, deer, antelope, water buffalo and bison as exotic animals eligible for voluntary inspection. These animals are similar to cattle, sheep, and swine, in that they are all even-toed, horned ungulates (having hoofs), and the concepts of head, viscera, and carcass inspection are easily adaptable from red meat inspection regulations and protocols. In the same sense, quail and pheasants are not that different from chickens, ducks, and turkeys, which are amenable poultry species for which inspection is required. On the other hand, ratites present a slightly different issue in that their size prevents utilization of standard automated poultry lines. Depending on the anatomy of the animal, facilities, protocols, HACCP plans, and other components of the Federal inspection process may need to be restructured, retrofitted, or amended to accommodate new species, if additional species are brought under mandatory inspection.

According to 1998 data compiled by FSIS, voluntary inspection was provided by FSIS to a wide variety of eligible non-amenable species, ranging in anatomical size from bison to quail. Table 1 lists the species for which voluntary Federal inspection was provided in 1998. The Table provides the production in numbers of animals (and birds) slaughtered by species, the number of Federal establishments/plants participating in the voluntary inspection of the various species, and the states where the plants are located. Together with the data in Table 2, this kind of information may be useful in determining exposure to potential pathogens or agents of zoonotic disease which may be associated with a particular species. Such information could be important in projecting potential risk of various populations who might eat animal foods derived from a particular species. The sufficiency or extent of the market, i.e., possible exposure, could be a factor in determining which species, if any, should be brought under Federal mandatory inspection if a public health issue is identified. Later in this paper, the criterion of "sufficiency of

market" is discussed as one of several criteria on which to base selections of current non-amenable species for mandatory inspection in the future.

Some exotic species are currently slaughtered and inspected in State inspected meat or poultry processing plants that are not reflected in Table 2. For example, there is a market for meat products derived from wild boar (feral swine) which is used as human food, but wild boar is not included in Table 2. Additional information regarding what other exotic species are being inspected under State inspection needs to be acquired and considered before the Agency can make a determination to extend mandatory Federal inspection to additional species.

The degree to which there is a public health need to extend mandatory inspection to exotic species is uncertain. According to literature reports¹, every year, in the United States, foodborne infections cause millions of illnesses and thousands of deaths, but this situation is not primarily a result of a breakdown in the inspection system.

It is known that more than 200 known diseases are transmitted through food.² The causes of foodborne illness include viruses, parasites, bacteria, toxins, metals, and prions. A recent article published by the Centers for Disease Control (CDC) estimated that, in the United States, foodborne diseases cause approximately 76 million illnesses, 325,000 hospitalizations, and 5,000 deaths each year. Known pathogens account for an estimated 14 million illnesses, 60,000 hospitalizations, and 1,800 deaths. The conclusion of the authors was that "overall, foodborne diseases appear to cause more illnesses but fewer deaths than previously estimated."³ The CDC also concluded that surveillance of foodborne illness is complicated by the fact that (1) incidences are underreported, (2) pathogens dispersed through food are also spread through water or from person to person, thus obscuring the role of foodborne transmission, and (3) some proportion of foodborne illness is caused by pathogens or agents that have not yet been identified and thus cannot be diagnosed. They stated that the importance of this final factor cannot be overstated because many of the pathogens of greatest concern today (e.g., *Campylobacter jejuni*, *Escherichia coli* 0157:H7, *Listeria monocytogenes*, and *Cyclospora*) were not recognized as causes of foodborne illness just 20 years ago.

Foodborne illness is a multi-faceted cause and effect phenomenon. Further, the epidemiology of foodborne disease is changing. New pathogens have emerged. Many, including *Salmonella*, *Escherichia coli* 0157:H7, *Campylobacter*, and *Yersinia enterocolitica*, have reservoirs in healthy food animals, from which they spread to an increasing variety of foods. There is no simple or universal way of preventing foodborne disease. Food reaches the consumer through long chains of industrial production, in which many opportunities for contamination exist.

¹ Bryan, FL *Diseases transmitted by Foods*, Atlanta: Centers for Disease Control, 1982.

² Ibid.

³ Mead, Paul S., et al., *Food-Related Illness and Death in the United States*. Emerging Infectious Diseases, Atlanta, Georgia Center for Disease Control, 1999.

Foodborne pathogens share a number of characteristics. Virtually all have an animal reservoir from which they spread to humans. Many do not cause symptoms of illness in the carriers, e.g., chickens with a lifelong ovarian infection with *Salmonella enteritidis*, calves carrying *E. coli* 0157:H7, and oysters carrying Norwalk virus or *Vibrio vulnificus*. Limited existing research on how animals acquire and transmit emerging pathogens among themselves often implicates contaminated fodder and water; therefore, public health concerns must now include the safety of what food animals themselves eat and drink.

According to a CDC publication⁴, more research is needed to answer questions about whether and how a pathogen such as *E. coli* 0157:H7 persists in the bovine reservoir, in order to establish the size and dynamics of a reservoir for this organism in wild deer. The CDC publication cites a report of an outbreak of *E. coli* 0157:H7 attributed to jerky made from deer meat that was also reported in the April 16, 1997 issue of Journal of the American Medical Association (pages 1229-31). These sources reported that it is reasonable to suspect animal flesh foods as having the potential to pose some level of risk to human health. This view highlights a need to determine the extent of the risk and which animals should be included in a mandatory USDA inspection system in order to protect the public.

Strategies to prevent foodborne illness must consider the sources of the possible contamination, and if, and how, an inspection process can be instituted as an effective prevention measure in reducing risk to human health. The difficulty of obtaining indisputable, scientific data linking a specific species harboring a specific pathogen responsible for causing illness or death should not deter FSIS from pursuing a thoughtful approach for bringing new species under mandatory Federal inspection. Such an approach would be precautionary and based on the rationale that any animal used for human food is a potential source for agents that could cause foodborne illness. >

Furthermore, the demographics of consumers is changing; there are increasing numbers of elderly or immunosuppressed persons who are at higher risk of severe illness, and consumers spend less time cooking than before and many have received less instruction in safe food handling in their home or at school than before. According to the Administration on Aging, by the year 2030, there will be about 70 million older persons, more than twice the number than in 1997. People over 65 years of age are projected to represent 13 percent of the population in the year 2000, but they will represent 20 percent by 2030.⁵ Traditionally, it is the elderly, very young, pregnant and lactating women, and immuno-compromised individuals who are at greatest risk of complications resulting from foodborne illness. It is not known to what extent these populations are likely to eat

⁴ Emerging Foodborne Diseases: An Evolving Public Health Challenge, Robert V. Tauxe, Centers for Disease Control and Prevention, Atlanta, Georgia, October - December 1997, Volume 3 Number 4

⁵ Profile of Older Americans: 1998, Administration On Aging. *Population Projections of the United States by Age, Sex, Race and Hispanic Origin: 1995-2050*, "Current Population Reports, P25-1130, Data compiled primarily from Internet releases of the U.S. Bureau of the Census and the national Center for Health Statistics, Administration On Aging.

foods derived from exotic animals. Such information might be helpful in identifying which exotic animal species to include in the mandatory inspection process.

The principles that the Agency should apply in determining the applicability of mandatory inspection to additional species should also consider the allocation of inspection resources based on the relative food safety risks presented by different animal flesh foods and should be hazard-based, science-based, and public-health based. Logistical and practical adaptations of inspection protocols, facilities designs, and equipment to the unaccustomed physical attributes of non-amenable species would play a secondary role and would need to be considered if mandatory inspection is extended to additional non-amenable and exotic species.

Costs of Mandatory Inspection for Additional Species

Extending the coverage of USDA mandatory inspection to additional species would entail costs for FSIS and for industry. Effects on State governments and consumers are more ambiguous. Many of the costs for FSIS and the industry are start-up costs that would be one-time expenditures. Other costs would be continuing expenditures associated with mandatory inspection. These costs should be compared against the benefits of mandatory inspection for additional species.

There would be start-up costs for FSIS if and when any additional species come under mandatory inspection. The Agency would be responsible for conducting baseline microbiological studies. These studies would then be used to develop performance standards for relevant microorganisms. Appropriate testing procedures and criteria would also be established. Chemical residue testing would be necessary to determine how additional species would be incorporated into the Agency's annual residue testing program. Furthermore, countries that previously had little interest in export certification may petition the Agency if additional species come under mandatory inspection. Foreign firms that specialize in exotic species may seek to broaden their markets by exporting to the United States. The Agency may need to evaluate the equivalence of a greater number of foreign food regulatory and inspection systems.

Continuing expenditures for FSIS would primarily be inspection and compliance activities. An important cost issue that deserves explicit attention arises in the transition from voluntary to mandatory inspection. Under voluntary inspection, firms pay the costs of inspection according to the AMA. Under mandatory inspection, the funds for inspection activities come from appropriated funds. The transition from voluntary to mandatory inspection effectively results in a loss of income for the Agency. While this change is effectively a transfer, it is an important distributional consideration. Under mandatory inspection, the number of animals slaughtered in official establishments would increase. The number of establishments slaughtering these species would also be expected to increase. Data is not yet available to quantify these increases. FSIS expenditures on inspection activities would need to rise accordingly. FSIS expenditures on compliance activities, particularly for compliance with the provisions of the Agency's Pathogen Reduction/Hazard Analysis Critical Control Point (PR/HACCP) final rule, for

additional species would also need to increase accordingly. Thus, the effect would be twofold. First, the agency will have to fund these activities through appropriated funds rather than user fees. Second, the number of animals and establishments will increase, yielding increases in the overall level of spending on inspection and compliance for these species. A final issue that must be taken into account in determining the total cost to the Agency is the situation regarding reimbursement to State inspection programs.

The economic effects on State governments of making inspection mandatory for non-amenable species are complex. States that do not have a State program for exotic animal inspection have little additional impact. However, States that already provide inspection for exotic species (Alaska, for example, kept reindeer inspection when it gave up its inspection program) would be reimbursed for 50 percent of the State costs under the current reimbursement schedule. However, a State would be required to fund the other 50 percent of the cost. States would also no longer be able to collect fees for inspection. Some States may give up their inspection programs altogether or give up inspection of exotic animals. If a State drops its inspection program, FSIS will be required to take over inspection and absorb the total costs. There are also other complications for State inspection programs, particularly for States that do not have "equal to" programs.

Much of the industry would also face start-up costs. Establishments may be required to retrofit slaughter equipment and facilities in order to allow the inspection of additional species. In addition, all official establishments would have to comply with the provisions of the PR/HACCP final rule. Under the provisions of the rule, all slaughter establishments (including those plants under voluntary inspection) will be required to have HACCP plans and meet pathogen reduction standards by January 25, 2000, when very small plants enter the system. Large and small slaughter facilities are currently required to comply with the rule. If mandatory inspection was to be implemented, all plants that slaughter additional species would be required to comply with this rule within an allowable period, except in the case of previously established exemptions that remain in effect. However, those facilities that are currently under voluntary inspection are already under HACCP or will be in January 2000. Their costs will likely be lower because they were already moving to a HACCP-based system. For other plants, the start-up costs include developing HACCP plans, training staff on HACCP, and developing sampling plans for microbial testing. These costs will be highest for establishments that do not currently participate in the voluntary inspection program.

There are also recurring costs for industry. Establishments will be responsible for HACCP record keeping and analyzing samples for relevant microorganisms. Again, firms under voluntary inspection would also be responsible for such costs. Only plants that had previously been without inspection would face these additional costs.

Consumers also face a relatively ambiguous situation. It is generally assumed that the costs of voluntary inspection are passed on from producers to consumers. As the burden of paying for inspection is removed from firms, firms may be able to charge less for their products. On the other hand, mandatory inspection may improve the marketability of

these products. If supply does not expand sufficiently to meet this increase in demand, prices rise as a result. The exact measure of these shifted costs is not currently known.

In the consideration of making the inspection of additional species of animals mandatory, the exemption for custom operations is not expected to change. Therefore, there will be no added costs associated with adding custom operations to those for commercial distribution.

Recommendations for Criteria in Determining Additional Species to Add to Mandatory Inspection

This concept paper has explored several important issues with regard to extending mandatory inspection to additional species. A key function of this paper, beyond what has already been discussed, is to enumerate some criteria on which to base decisions on whether a species should be placed under mandatory inspection. These criteria, though not exhaustive, will provide a clearer guide to policymakers.

- **The Animal and Its Products Are Used as Food for Human Consumption**

There is nothing to gain from FSIS regulation of the slaughter of animals that are not used as food for human consumption. Likewise, there is no associated risk of human illness if humans do not consume a particular species.

- **There Is Microbiological Risk**

There must be sufficient microbiological risk for FSIS to mandate inspection and there must be evidence that inspection can do something about the risk. If pathogens are unlikely to be present, scarce resources can be utilized more efficiently elsewhere.

- **There Is Scientific Evidence Linking New Species to Human Illness**

Microbiological risk does not always translate into human illness. Species that are shown to be associated with documented human illnesses, e.g., zoonotic diseases, should be given priority.

- **Sufficiency of Market**

The size of the market must be a consideration in the allocation of limited FSIS resources. The level of production and the level of consumption are factors that effect the extent to which the population is exposed to microbiological risk and risks of other diseases associated with animal species not currently under mandatory inspection. They also affect the efficiency of inspection operations, as there must be an official establishment ready to slaughter the animal and do so in sufficient numbers to make inspection efficient (e.g., require at least 1 full-time inspector). This criterion may have a regional component because some species tend to be produced, marketed, and consumed in larger quantities in certain regions of the United States (such as bison is in the West).

- **Compatibility with the FSIS Inspection System**

An establishment with a grant of inspection must be available and within a reasonable geographic location to where animal species not currently under inspection are raised or caught. The establishment must have the requisite staff years of inspection personnel.

Additionally, some species present novel inspection problems. For example, ostriches are typically too large to be processed on the same equipment as chickens. It may be necessary for establishments to retrofit equipment and facilities in order to slaughter and process certain species. Other things being equal, those species that are more compatible with inspection procedures and facilities should be converted to mandatory inspection before those species that are less compatible.

- **Cost**

This criterion ensures that Agency funds are spent efficiently, i.e., on mandatory inspection where social benefits (from improved human health) outweigh social costs. Furthermore, this criterion can be used to prioritize among species even when there are positive social benefits. There are a number of tools that allow for such welfare-improving choices, of which the maximization of net benefits or the maximization of a benefit/cost ratio are examples.

Application of the Criteria

These criteria can be viewed as a sequence of things to consider from a public health perspective. Applying the criteria would require available data on the production volume of non-amenable species and the locations of establishments where non-amenable species are slaughtered and processed, such as that presented in Tables 1 and 2. Most, if not all, non-amenable species in the Tables will pass the test of microbiological risk. Human illness significantly and unambiguously restricts the number of species considered. Documented human illnesses, however, are relatively difficult to find. Such a lack of data alone should not exclude species from consideration for mandatory inspection. Sufficiency of market will further limit the number of species. However, if the species is produced, marketed, and consumed in relatively large quantities, as in the case of ratites, rabbit, pheasant, quail, and squab, the case for mandatory inspection is strengthened. Compatibility with inspection also narrows the field of potential species because establishments with grants of inspection are not always available near the locations where non-amenable species are raised or caught, and because some species present novel inspection problems due to their awkward physical conformation, e.g., ostriches. Finally, cost provides the final test to determine the manner in which scarce resources are used to improve public health. None of these criteria should be used alone as evidence in favor of or in opposition to expanding mandatory inspection to additional species. They should be used collectively to determine the appropriate course of action.

Conclusion

In order to add to the species of animals required to be inspected by USDA using the criteria suggested in this paper, more information is needed. The Agency welcomes the input of the NACMPI on the approach of using these criteria and whether, in fact, they are adequate or whether other criteria are necessary.

Specifically, information is needed regarding the exposure of at-risk populations to human foods derived from exotic species. Information is also needed regarding the specific pathogens that are associated with exotic species and confirmed reports about foodborne illnesses associated with products of exotic species.

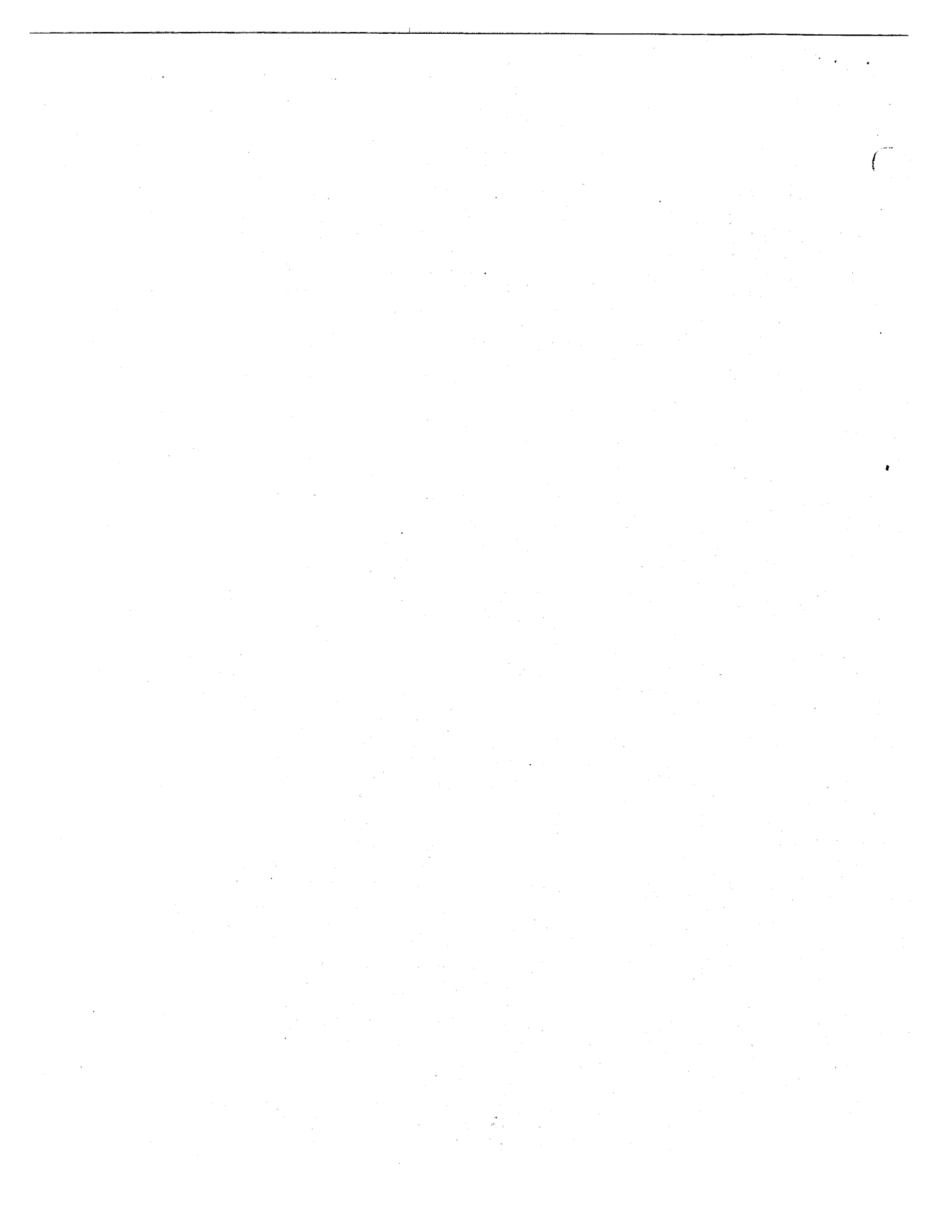
It is widely known that animal flesh products are potential sources for microbiological and zoonotic foodborne illnesses. Mandatory inspection of animal species provides a means of ensuring consumers receive safe products. It can be assumed that some number of consumers are exposed to greater public health risks from products derived from animals that are not under mandatory inspection or voluntary inspection. In order to alleviate public health risks in an effort to achieve a seamless Federal/State food safety inspection system, criteria can be developed and used to determine what additional species should be added to mandatory inspection.

Such criteria include whether the animal species is used as human food, whether the animal species is likely to present microbiological risks or cause human illnesses, and whether the animal species product is produced and consumed in a large enough volume to make exposure a public health concern (especially to at-risk populations). These factors need to be weighed against the compatibility of the inspection of the non-amenable species to current inspection procedures and practices, and the costs of including the additional species under the mandatory inspection program.

A more comprehensive analysis of the costs associated with adding to the list of amenable species also needs to be performed. These costs are not straightforward. Cost estimates must account for the different scenarios that may occur. For example, species being inspected by FSIS under voluntary inspection generate funds for the Agency. When these species fall under mandatory inspection, FSIS loses these funds and continues to spend the resources. Additionally, costs will not remain constant; when inspection becomes mandatory, the number of animals slaughtered increases and the number of establishments slaughtering and processing increase. Thus, the Agency's costs increase, requiring additional appropriated funds or the re-direction of existing funds.

Further consideration and analyses are needed from State inspection programs regarding the effect of adding more species to mandatory inspection. If States performing exotic animal inspection do not have an "equal to" program, they must create one or the inspection activity is absorbed by FSIS. States must consider how long it will take them to start an "equal to" program and what happens during that start-up period. These States would have to pass legislation, appropriate funds, and train personnel, among other things.

FSIS:OPPDE:LAPD:AManka/RCPPost/NYoung:9-13-99:205-0279
Wordfile: TRP\Amenability Extending USDA Inspection final .doc
Revised:RCPPost:9/29/99
Revised:RCPPost:10/15/99 per PDerfler's Comments
Wordfile: TRP\Amenability species paper NACMPI10-21-99.doc:
Revised:AManka:10/20/99 per Derfler
Revised:RCPPost/AManka:10-21-99 per Derfler



**Non-Amenable Species
Slaughtered in Federal Establishments
Under Voluntary Inspection - 1998**

Species	Total Production	No. Plants/Species	State/Species
Ostrich	33,521	85	AZ, AR, CA, CO, FL, GA, ID, IL, IA, KS, KY, LA, MI, MN, MS, MO, MT, NE, NM , NY, NC, OH , OK, OR, PA, SC, TN, TX, WA, WI
Emu	14,745	61	AZ, AR, CA, CO, FL, GA, ID, IL, IA, KS, KY, LA, MI, MN, MS, MO, MT, NE, NV , NC, OK, OR, PA, SC, TN, TX, WA, WI
Other Ratite	20	5	AZ, GA, KS, OR, PA.
Total Ratite	48,286		
Reindeer	295	2	ME
Elk	94	13	CO, ID, KS, MI, MN, MO, MT, NE, PA, UT
Deer	713	19	GA, IL, KS, KY, MI, MN, MO, NV, OR, PA, TN, TX, UT
Total Cervidae	1,102		
Antelope	10	1	TX
Water Buffalo	110	10	CA, FL, GA, MI, NY, TX, VA
Bison	12,168	56	AR, CO, FL, GA, ID, KS, KY, ME, MI, MN, MO, MT, NE, NM, NV, NC, ND, OH, OK, OR, PA, TN, TX, WV, WI
Rabbit	309,475	5	AR, CO, FL, MD, OR
Pheasant	17,326	4	CA, MN, OR
Quail	6,328,090	2	GA, OR
Squab	175,469	2	CA, OR
Other Fowl	2,000	1	OR

Table 2

**Non-Amenable Species Inspected Under Federal or State Inspection
During a 12 Month Period in 1998 to 1999**

	<u>Federal Inspection</u>		<u>State Inspection</u>		<u>Total Inspected</u>
	<u>Carc./Birds</u>	<u>% of Total</u>	<u>Carc./Birds</u>	<u>% of Total</u>	
Ratites	48,286	83%	9,986	17%	58,272
Cervidae	1,102	20%	4,357	80%	5,459
Antelope	10	71%	4	29%	14
Water Buffalo	110	96%	5	4%	115
Bison	12,168	81%	2,907	19%	15,075
Rabbit	309,475	98%	5,803	2%	315,278
Pheasant	17,326	11%	146,612	89%	163,938
Quail	6,328,090	49%	6,682,805	51%	13,010,895
Squab	175,469	45%	215,339	55%	390,808
Other Fowl	2,000	47%	2,248	53%	4,248
Other Animal	83	50%	83	50%	166
Total	6,894,119	49%	7,070,149	51%	13,964,268
Animals	61,759	78%	17,342	22%	79,101
Birds	6,832,360	49%	7,052,807	51%	13,885,167
No. of Establishments		159		342	

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To amend the Poultry Products Inspection Act to cover birds of the order Ratitae that are raised for use as human food. (Introduced in the Senate)

S 1133 IS

106th CONGRESS

1st Session

S. 1133

To amend the Poultry Products Inspection Act to cover birds of the order Ratitae that are raised for use as human food.

IN THE SENATE OF THE UNITED STATES

May 25, 1999

Mr. GRAMS introduced the following bill; which was read twice and referred to the Committee on Agriculture, Nutrition, and Forestry

A BILL

To amend the Poultry Products Inspection Act to cover birds of the order Ratitae that are raised for use as human food.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. EXPANSION OF DEFINITION OF POULTRY TO INCLUDE RATITES.

(a) DEFINITION OF POULTRY- Section 4(e) of the Poultry Products Inspection Act (21 U.S.C. 453(e)) is amended by adding at the end the following: 'The term 'poultry' includes birds of the order Ratitae, such as ostriches, emus, and rheas, that are raised for distribution in commerce as human food.'

[http://thomas.loc.gov/cgi-bin/query/z?c106:S.1133:](http://thomas.loc.gov/cgi-bin/query/z?c106:S.1133)

02/07/2000

[http://thomas.loc.gov/cgi-bin/query/z?c106:S.1133:](http://thomas.loc.gov/cgi-bin/query/z?c106:S.1133)

02/07/2000

Soon (into editing 2/7)

Ret. cys:

1999 Assembly Joint Resolution

B Relating to: urging Congress to enact legislation requiring mandatory inspection of ratites under the Federal Poultry Products Inspection Act.

¶ Whereas, currently, poultry products from animals such as chickens and turkeys ^{are required} to be federally inspected in order to be sold in interstate commerce; and

¶ Whereas, under current federal law, ratites (ostriches, emus, and rheas) ^{are excluded from mandatory inspection,} but ^{ratite producers} may obtain voluntary inspection, the cost of which must be paid by the ~~ratite~~ producer; and

¶ Whereas, the cost of voluntary inspection results in higher prices for ratite meat; and

¶ Whereas, ratite meat is low in fat and high in protein; and

¶ Whereas, most ratite producers are small,
family-owned operations; and

¶ Whereas, legislation has been introduced in
Congress to cover ratites raised for human
consumption under the Poultry, ^{Products} Inspection Act,
eliminating the costly inspection fees that
other meat producers are not required to pay; and

¶ Whereas, this legislation, H.R. 765 and S. 1133, is
an important step in enabling the ratite industry
to grow; and

¶ Whereas, the American Farm Bureau supports H.R. 765
and S. 1133 as leveling the playing field for the
ratite industry; now, therefore, be it

¶ Resolved by the assembly, the senate concurring, That
the members of the Wisconsin legislature urge Congress
to pass H.R. 765 and S. 1133; and, be it further

¶ Resolved, That the assembly chief clerk shall provide a

copy of this joint resolution to each member of this
state's congressional delegation.

(End)

**SUBMITTAL
FORM**

**LEGISLATIVE REFERENCE BUREAU
Legal Section Telephone: 266-3561
5th Floor, 100 N. Hamilton Street**

The attached draft is submitted for your inspection. Please check each part carefully, proofread each word, and **sign** on the appropriate line(s) below.

Date: 02/07/2000

To: Representative Grothman

Relating to LRB drafting number: LRB-4489

Topic

Ask Congress to support legislation concerning inspection of meat from ratites

Subject(s)

Agriculture - animals, Memorials - Congress to

1. **JACKET** the draft for introduction _____



in the **Senate** _____ or the **Assembly** (check only one). Only the requester under whose name the drafting request is entered in the LRB's drafting records may authorize the draft to be submitted. Please allow one day for the preparation of the required copies.

2. **REDRAFT.** See the changes indicated or attached _____.

A revised draft will be submitted for your approval with changes incorporated.

3. Obtain **FISCAL ESTIMATE NOW**, prior to introduction _____.

If the analysis indicates that a fiscal estimate is required because the proposal makes an appropriation or increases or decreases existing appropriations or state or general local government fiscal liability or revenues, you have the option to request the fiscal estimate prior to introduction. If you choose to introduce the proposal without the fiscal estimate, the fiscal estimate will be requested automatically upon introduction. It takes about 10 days to obtain a fiscal estimate. Requesting the fiscal estimate prior to introduction retains your flexibility for possible redrafting of the proposal.

If you have any questions regarding the above procedures, please call 266-3561. If you have any questions relating to the attached draft, please feel free to call me.

Rebecca C. Tradewell, Managing Attorney
Telephone: (608) 266-7290