



Consumer Federation of America

December 16, 2009

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 2-2127 George Washington Carver Center
5601 Sunnyside Avenue
Beltsville, MD 20705

RE: Docket No. FSIS-2008-0039

The Consumer Federation of America (CFA) is pleased to provide comments on the Food Safety and Inspection Service's (FSIS) proposed rule on Interstate Shipping of Meat and Poultry Products (Docket No. FSIS-2008-0039). CFA is a nonprofit association of 280 consumer groups, representing more than 50 million Americans nationwide, that was established in 1968 to advance the consumer interest through research, education and advocacy.

CFA strongly supports FSIS' proposed rule on Interstate Shipping of Meat and Poultry Products. The proposed rule adheres closely to compromise language developed during the debate over the 2008 Farm Bill. This language was carefully crafted to meet the desire of some state-inspected meat plants to enlarge their area of sales while assuring that all meat and poultry sold across state lines meet federal inspection standards. Consumer groups and victims of foodborne illness opposed the House-passed language that ended the 45-year-old requirement that all meat and poultry shipped in interstate commerce had to comply with federal standards. Consumer and victims groups opposed having different standards for products moving across state lines.

At the request of House Agriculture Chairman Collin Peterson, Roger Johnson, representing the National Association of State Departments of Agriculture, Tom Buis, representing the National Farmers Union, Tony Corbo of Food & Water Watch, Alan Kadrofske of the American Federation of Government Employees, Michael J Wilson of the United Food and Commercial Workers Union, and Christopher Waldrop and Carol Tucker-Foreman of Consumer Federation of America met and negotiated language to which all the groups could agree. These groups plus the Center for Science in the Public Interest signed a letter to then-Chairman of the Senate Agriculture Committee Tom Harkin and Ranking Minority member Saxby Chambliss stating that they would support this language if it were included in the Farm Bill. Other consumer and trade organizations also expressed their support. The final language was fair and met the needs of all

stakeholders. As such, we commend FSIS for writing proposed regulations that closely adhere to both the intent and specific language of the legislation.

THE IMPORTANCE OF FEDERAL STANDARDS FOR MEAT AND POULTRY INSPECTION

The primary purpose of meat and poultry inspection is to protect public health. Consumers rely on the federal government to assure the safety of meat and poultry products sold in interstate commerce. Forty years ago increasing concerns about filthy meat products led Congress to enact the Federal Meat Inspection Act. Its goal was to protect public health and the markets for meat products by establishing a uniform federal meat inspection system. The Act required that no meat or poultry can be sold in interstate commerce until a federal inspector, sworn to protect public health, verifies that the product is safe, wholesome and accurately labeled. American consumers recognize and count on the safety of meat and poultry products that bear the label, "Inspected and Approved, U.S. Department of Agriculture."

The FMIA, as passed, included compromise language to avoid putting state inspection programs and some small plants that would have trouble meeting federal standards out of business overnight. However, Congress acknowledged both the value of a uniform federal system and the historical fact that 50 state inspection programs had not met either industry or public health needs and limited the sale of products produced in state inspected plants to intrastate commerce.

The 2008 Farm Bill created a new voluntary cooperative program under which certain state-inspected establishments with 25 or fewer employees could be eligible to ship meat and poultry products in interstate commerce. In crafting this program, Congress was careful to maintain the integrity of the federal meat and poultry inspection program and assure that any meat and poultry products shipped in interstate commerce meet federal safety standards. While the new program provided that the inspection personnel of a state agency would inspect the plants, it also provided that the plants would meet federal standards and state inspection personnel would enforce federal meat and poultry inspection laws, not state laws. (State inspected plants could continue to operate intrastate).

Additionally, the new law required USDA to designate a Department employee as state coordinator for each state program to provide oversight and enforcement of the new program; oversee training and inspection activities of the state inspection personnel; and ensure that the plants are fully complying with federal meat and poultry inspection laws. The law also provided USDA with the authority to suspend any plant's eligibility to sell in interstate commerce if the state coordinator determines that a plant is violating any requirement of the federal meat and poultry inspection laws, and then transition that plant to the federal meat and poultry inspection program.

CFA strongly supports the maintenance and improvement of federal public health standards for meat and poultry. Maintaining federal oversight and supervision of this new voluntary cooperative program is particularly important for consumer confidence and

public health. A September 2006 USDA Office of Inspector General audit of State Meat and Poultry Inspection Programs showed that state inspection programs were in fact, not “equivalent” to the federal program.¹ The OIG reported high levels of noncompliance with FSIS procedures and documented the failure of state-inspected plants to meet basic sanitation requirements. Despite known sanitation problems and public health concerns, state regulators routinely allowed these plants to continue operating.

The OIG reported that FSIS visited 11 meat plants in Mississippi in October 2003. None of the plants met all HACCP requirements. FSIS reported that cutting boards in one plant were heavily contaminated with meat residues from the previous day’s work and noted that some plants failed to monitor cooking temperatures, potentially exposing consumers to bacteria that cause foodborne illness. The Mississippi meat inspection program allowed the plants to continue operating. FSIS allowed the Mississippi program to keep operating though it was not meeting the “equal to” federal inspection legal requirements. CFA examined FSIS reviews of other state programs and found similar problems in other states. In order to assure the safety of meat and poultry products sold in interstate commerce, it is important that FSIS maintain adequate oversight of this new cooperative program with the states.

KEY ELEMENTS OF PROPOSED RULE

CFA strongly supports the framework and specific procedures outlined in the proposed rule for identifying and selecting eligible establishments; monitoring state programs and enforcing federal laws and regulations; affixing a new federal mark of inspection; and deselecting ineligible establishments and transitioning them to the federal inspection system. In particular, CFA wishes to highlight several key areas.

Assuring State Programs Meet Federal Standards

The statutory language in the Farm Bill requires that plants participating in this new program operate programs that are “the same as” the federal inspection program. State inspectors under this new program should be conducting the same inspection activities as those performed in federal plants regulated under the FMIA and Poultry Products Inspection Act. This is especially important because meat and poultry products entering interstate commerce through this program will carry the Federal mark of inspection. Consumers expect that products carrying this mark meet federal standards for meat and poultry inspection. Consequently, any state inspection program shipping products in interstate commerce should meet the same standards as the federal inspection program.

In order to determine if a State inspection program can participate, FSIS will have to verify that States have sufficient authority, resources, personnel, training, sampling capability and laboratory capacity to oversee plants that meet federal requirements. CFA notes that State inspection programs are often under financial duress as a result of State budget problems or economic downturns. FSIS must conduct comprehensive analyses of State inspection programs and available resources to verify that States can adequately participate in this new program and assure that products inspected under this program meet federal standards. FSIS must also carefully monitor budget issues in participating

¹ USDA OIG, report No. 24005-1-AT. September 2006

States on an ongoing basis to assure that resources continue to be sufficient to justify the State's continued participation in the program.

Plant Employee Limit

The proposed rule makes clear that establishments eligible to participate in the new program must employ on average no more than 25 employees, including full-time, part-time and temporary employees. CFA strongly supports the decision to include all categories of employees in determining a plant's eligibility.

CFA preferred a limit of 10 employees, which is similar to the current USDA definition for very small plants. During our negotiations with NASDA and NFU, we only reluctantly agreed to NASDA's desire for a 25 employee limit. None of the groups involved ever agreed to anything larger than 25 employees. Most very small plants have few full-time employees. Many do not operate every day. Including part-time and temporary as well as fulltime employees in the employee limit is an effective means to assure the program serves the entities it was intended to serve. Not including part-time and temporary employees in the average number of employees would permit substantially larger entities to participate in a program that was designed to serve very small local plants. The 50 employee limit in the House bill was a primary reason CFA opposed the House-passed bill. It would expand the number of plants in the new cooperative program far beyond what was intended. In 2007 over 80 percent of the 5,600 federally inspected plants had 50 or fewer employees.

In considering this point, it is important to note that plants with over 25 employees can produce a substantial amount of product. A plant with 10 employees can produce approximately 14,000 pounds of beef per day, while a plant with 25 employees can produce over 35,000 pounds of beef per day. A plant with 35 employees can produce over 50,000 pounds of beef daily. The increase of just 10 employees (from 25 to 35 employees) can result in an increase of beef production of 35 percent. If a plant maintains on average more than 25 employees and wishes to ship in interstate commerce, the appropriate solution for the plant is to become a federal establishment.

Selected Establishment Coordinator

The statutory language of the Farm Bill establishes a State coordinator for each State agency to provide oversight and enforcement of the new program and to oversee training and inspection activities of the State personnel. In the proposed rule, FSIS anticipates a total of 16 states participating in the new program, but only estimates 13 Selected Establishment Coordinators. FSIS believes that contiguous States could make it appropriate to have less than one SEC per state. CFA disagrees with this decision and urges FSIS to assign one SEC for each state participating in the new program. Consumer groups have raised concerns with FSIS in the past about federal inspectors being responsible for plants in too large a geographic area. The result of inspectors being spread too thin means that inspectors spend an inordinate amount of time driving from plant to plant and do not have sufficient time to effectively carry out their inspection duties. Considering the importance of adequate oversight of this new program, CFA believes that each State should have its own SEC.

As detailed in the proposed rule, the SEC is a federal employee; as such it is appropriate that the SEC be stationed at the District Office and report to the District Manager and ultimately, FSIS headquarters. The SEC should not be stationed at the State meat and poultry inspection agency, but should maintain frequent communication with State agency officials.

Transitioning a Deselected Establishment to a Federal Establishment

As provided for in the law, the proposed rule establishes a process by which FSIS shall deselect a selected establishment that becomes ineligible to participate in the program for a specific reason; i.e., the establishment is in violation of the federal meat and poultry inspection acts, the establishment employs on average more than 25 people, or the interstate shipment program for the state in which the establishment is located was terminated. In the proposed rule FSIS outlines some general transition procedures (changing the establishment number, replacing state personnel with FSIS inspection personnel, etc.), but has decided against outlining further procedures in lieu of collaborating with the state on a case-by-case basis. While this approach may be appropriate in dealing with individual establishments in a state, FSIS should develop specific procedures for instances when the entire state inspection program is terminated.

Establishments should also anticipate that as they grow and add additional employees beyond the 25 employee limit, they will be transitioned to the federal inspection system. It is essential that establishments not be permitted to “forum shop” for regulatory oversight. If plants are meeting the requirements of the new program and are succeeding, there should be no reason why the plants that outgrow this special program would not be transitioned to the federal system. Again, it was not the intention of Congress to encourage two competing interstate inspection programs. Federal meat and poultry inspection has provided a reasonably high level of food safety. Multiple standards and programs create the risk of increased foodborne illness. Studies show that when foodborne illnesses arise consumers may reduce, if only for a short time, their purchases of the implicated product class.

Reimbursement, Technical Assistance and Transition Grants

The statutory language in the Farm Bill provided several means through which FSIS and the States could work together to successfully develop this new program. First, Congress provided that FSIS would reimburse the States for at least 60% of the eligible costs for the program. Second, Congress authorized FSIS to provide transition grants to assist States in helping state establishments transition to the new program. FSIS’ tentative conclusion to reimburse States for the costs of HACCP training for establishment employees is an appropriate use of these grants.

Finally, FSIS was instructed to establish a “technical assistance division” to provide training, education and outreach to help state establishments meet the necessary federal standards to participate in the new program. FSIS has already created a division to provide technical assistance for small and very small plants (the Office of Outreach Employee Education and Training), so the agency is adequately prepared for this type of

assistance. Consequently, transition grants should not be provided to the states for duplicative outreach services and instead should be used to reimburse the cost of HACCP training as noted above.

Combined, these efforts should help both the States and FSIS assure that the program operates according to the new law and that meat and poultry shipped in interstate commerce meets federal standards. However, it is important to note that the Administration must budget, and Congress must appropriate, adequate funding for each of these activities. In particular, the Office of Outreach will need sufficient resources to conduct workshops, training sessions, and other activities to ensure that small and very small plants in the new program understand the requirements they are expected to meet.

SMALL AND VERY SMALL PLANTS CAN MEET FEDERAL REQUIREMENTS

CFA's members want to support local businesses that meet federal public health requirements. We supported the creation of the cooperative interstate program because it gives these small plants the opportunity to be inspected by state inspectors (who plants describe as friendlier, more helpful and more cooperative than federal inspectors) but has provisions that assure the plants satisfy all federal safety standards. CFA does not believe there is a benefit to public health to have two standards for meat sold in interstate commerce.

CFA is aware of charges that small plants cannot satisfy federal meat inspection requirements and that the federal rules establish unfair barriers to smaller plants. Available data don't support the argument. In July 2007 CFA requested from FSIS a breakdown of the total number of large, small and very small plants under federal inspection. FSIS PBIS data showed that there were 5,603 plants in the system. Fifty-one percent of all federally inspected plants (2,878 of 5,603) have 10 or fewer employees and 80% have 50 or fewer employees. These small and very small plants now under federal inspection have invested time and money to comply with all federal regulations and operate under federal inspection. They operate successfully under federal inspection and can sell their products anywhere. CFA does not support providing an unfair advantage to small companies who don't or can't make the commitments necessary to comply with federal food safety requirements.

A look at the current landscape of meat and poultry plants across the country shows that small and very small plants can make the adjustments necessary to meet federal standards and sell their plants in interstate commerce. In every state that has a state inspection program, many small and very small plants are meeting the requirements of federal inspection and have chosen federal inspection rather than state inspection. In fact, even in those states with state inspection programs, most small and very small plants choose federal inspection.

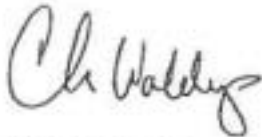
STATE	State Inspected Plants	Federally Inspected Small/Very Small
ILLINOIS	116	338

TEXAS	233	291
MISSOURI	30	193
GEORGIA	59	104
SOUTH CAROLINA	43	88

Arguments that small and very small plants cannot meet federal standards ring hollow. Any plant that is shipping meat in interstate commerce can and should meet federal safety standards. The new program outlined in the proposed rule will assist in creating opportunities for certain state-inspected plants to ship in interstate commerce while assuring that all meat and poultry sold across state lines meet federal inspection standards.

Thank you for the opportunity to provide comments on the proposed rule.

Sincerely,



Chris Waldrop
Director, Food Policy Institute
Consumer Federation of America



November 16, 2009

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 2-2127, George Washington Carver Center
5601 Sunnyside Avenue
Beltsville, MD 20705

RE: Docket No. FSIS-2008-0039
Submitted electronically via www.regulations.gov

Dear Sir or Madam:

On behalf of the non-profit consumer organization Food & Water Watch, I am respectfully submitting these comments to the proposed regulation entitled, "Cooperative Inspection Programs: Interstate Shipment of Meat and Poultry Products," that appeared in the September 16, 2009 Federal Register (74 FR 47648 – 47669).

Food & Water Watch has been an advocate for the development of local and regional food systems. We believe that Section 11015 of the 2008 Farm Bill will play an important role in creating markets for small and very small meat and poultry processors who heretofore have been prevented from selling their products across state lines even if it meant shipping them very short distances.

We endorse the proposed regulation with some minor modifications. Food & Water Watch played a key role in the negotiations of Section 11015 of the Food, Conservation, and Energy Act of 2008 (P.L. 110-246, hereafter referred to as the 2008 Farm Bill). Those negotiations resulted in an agreement reached by various national consumer organizations, the National Association of State Departments of Agriculture, the National Farmers Union, the American Federation of Government Employees, and the United Food and Commercial Workers Union.¹

The proposed regulation fairly closely comports with the statutory language in Section 11015. Both the statutory language and the proposed rule do the following:

- 1) They preserve the integrity of the federal meat and poultry inspection programs while at the same time setting up a procedure for small and very small state-

¹ See http://www.consumerfed.org/elements/www.consumerfed.org/file/food/Interstate_Meat_Press_Release_10_23_07.pdf

inspected facilities that meet federal food safety requirements to gain access to interstate markets; and

- 2) They do not permit the regulatory forum shopping that could have occurred had earlier congressional proposals on this issue been adopted.

There are several issues that we believe need to be addressed if the new interstate program is to be a success.

Role of Selected Establishment Coordinators

We do not believe that having a Selected Establishment Coordinator (SEC) cover more than one state is going to work (74 FR 47660). According to the agency, sixteen states have expressed an interest in participating in the new interstate program, but the agency is anticipating hiring only thirteen full-time equivalent positions to serve as SECs. The agency intends to use some SECs in more than one state. When the provisions of Section 11015 were negotiated, it was the intent to have one state coordinator per state inspection program. In order to provide adequate oversight of the new program, SECs need to be spending most of their time physically evaluating the efficacy of the state inspection programs rather than driving from state to state. So, there should be at least one SEC assigned per state participating in the new interstate program.

FSIS Division of Outreach, Employee Education and Training

The FSIS Division of Outreach, Employee Education and Training is going to play a pivotal role in making this new program a success so it needs to have the resources necessary to carry out the statutory requirements of the program that have been assigned to it. That means that it must be able to conduct workshops that are accessible to as many state-inspected plant owners as possible so they can learn the requirements of the new program. In addition, the division will need to conduct training sessions for state inspection personnel so that they are totally familiar with the regulatory requirements of the federal meat and poultry inspection programs. It should be made mandatory that the Selected Establishment Coordinators attend the same training sessions as plant owners and inspection personnel so that everyone is on the same page from the outset. The training should also be consistent across the country. The importance of consistent training and policy interpretation is an important lesson that should be learned from the implementation of HACCP.

The agency has encountered difficulty in the past in articulating and administering clear and consistent regulatory and enforcement policies for plants in the federal inspection program. This problem could be exacerbated as the agency assumes oversight of the interstate shipment program unless steps are taken immediately to remedy the situation. There have been notable examples of policy confusion that has prevented industry employees and federal inspectors from understanding their specific responsibilities. This confusion creates an inconsistent and unfair regulatory system, creating conflict and contradictory results across the industry. Therefore, we would like to recommend that an

"ombudsman" be created within the Division of Outreach, Employee Education and Training to field complaints about the agency's administration of the new interstate program.

As part of the outreach program to state-inspected facilities, USDA should through its "Know Your Food, Know Your Farmer" initiative provide information about USDA grant and loan programs that can help small and very small facilities upgrade their infrastructure to meet federal food safety requirements.

In June 2009 we issued a report entitled, "Where's the Local Beef: Rebuilding Small-scale Meat Processing Infrastructure" that describes the current obstacles for small processors to start and expand their businesses and offers solutions to those problems.² We hope that the agency will use our findings from the report to assist it in its outreach efforts to the state inspected plants.

Financial Viability of States

State governments are under financial duress all across the country. Some states have made cuts to their state inspection programs. Even though there is Federal cost-sharing for the state programs authorized in Section 11015, FSIS will need to verify that states wishing to participate in the new interstate program will be able to meet Federal inspection regulatory requirements during these hard economic times. Section 11015 of the Farm Bill also authorizes transition grants to help state programs with meeting federal regulatory requirements. We hope that the President proposes adequate funding in his FY 2011 budget to help defray the start-up costs to states so that they can participate in the interstate program, as well as ensuring that there is adequate funding for the cost-share provisions called for in Section 11015.

Conclusion

With the exception of certain minor issues, we endorse this proposed rule. The time has come to permit state inspected plants that meet federal food safety requirements to ship their products across state lines. If USDA sees fit to permit the People's Republic of China to export processed poultry products to the U.S. even with that country's checkered food safety record, certainly there are state-inspected meat and poultry facilities that currently meet federal food safety regulatory requirements and therefore should be eligible to put their products into interstate commerce.

Sincerely,



Wenonah Hauter
Executive Director

² See <http://www.foodandwaterwatch.org/food/pubs/reports/wheres-the-local-beef>

under the close supervision of the U.S. Department of Agriculture," AFGE Legislative Director Beth Moten said.

The Act would:

- Create a new, optional program for companies previously operating under state inspection laws that want to sell in interstate commerce;
- Require companies to operate under the federal meat and poultry inspection laws and provide federal oversight of operations in these plants;
- Encourage states to increase food safety testing by having USDA reimburse states for 100 percent of the costs for testing that exceeds the testing frequency of the federal government;
- Covers establishments with up to 25 employees;
- Direct USDA to develop a procedure for establishments that employ more than 25 employees and want to ship in interstate commerce to help those companies transition to federal inspection;
- Provide for companies in the program to use a federal mark, stamp, tag or label of inspection;
- Reimburse states for not less than 60 percent of the costs of operating the Title V program;
- Establish the position of State Coordinator, a federal employee, who will provide oversight and enforcement; oversee training and inspection activities; assure that plants are in full compliance of the Federal Meat Inspection Act and this Title; and report to the Secretary of USDA on status of the plant operations;
- Establish an inspection training division within the Food Safety Inspection Service (FSIS) to coordinate initiatives to provide outreach, education, and training to small or very small establishments;
- Require USDA's Office of Inspector General to conduct periodic audits to assure plants operating under Title V are complying with federal requirements; and
- Offer states an optional inspection tool. States will continue to maintain their current Title III cooperative agreements with USDA which require state inspection programs to be at least "equal to" federal requirements. USDA will continue their oversight of these programs, which includes an annual review of nine detailed components. States will still be required to implement any regulations, directives, and guidance issued by USDA, including all federal food safety and consumer protection requirements.

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[Read Coalition Letter](#)

This entry was posted on Tuesday, October 23rd, 2007 at 11:25 am and is filed under [Agriculture Programs](#), [Trade](#). You can follow any responses to this entry through the [RSS 2.0](#) feed.

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National Farmers Union

[Newsroom](#) » Interstate Shipment of Meat Agreement in Senate Farm Bill

Interstate Shipment of Meat Agreement in Senate Farm Bill

For Immediate Release: October 23, 2007

Contact: 202-554-1600

Supporting Audio: 1 track [audio:102307_TomInterstateShipment2.mp3]

WASHINGTON (Oct. 23, 2007) – National Farmers Union, along with Consumer Federation of America, National Association of State Departments of Agriculture, American Federation of Government Employees, Food & Water Watch, Center for Science in the Public Interest, National Consumers League, Center for Foodborne Illness Research and Prevention, Government Accountability Project, and United Food and Commercial Workers, announced today they have come to an agreement on the interstate shipment of meat and poultry products. The compromise legislation will be made part of the U.S. Senate farm bill.

The consumer, labor and farm group compromise will create a program for interstate sales and shipment of meat and poultry products from certain small plants. The plants will operate under the requirements of the Federal Meat and Poultry Inspection Acts. The resulting products will bear the USDA inspection seal and can be sold in interstate commerce.

"It has taken many years to reach this compromise and I am pleased smaller producers will finally have the opportunity to compete on a level playing field. For too long, small producers have been shut out of markets but will now be able to ship their high-quality products across state lines," NFU President Tom Buis said.

"The first priority of meat and poultry inspection is protecting us and our families from foodborne illness. This bill safeguards public health by continuing the requirement that all products shipped in interstate commerce are subject to the federal meat and poultry inspection acts. Tough safety standards protect those who produce food as well as those who consume it," Consumer Federation of America Distinguished Fellow Carol Tucker Foreman said.

"Our state-inspected, locally-produced meats are some of the best, safest and high quality specialty products in this country. American consumers deserve greater access to safe, nutritious products from state-inspected meat and poultry processors. And American livestock producers, processors and small businesses deserve to compete in the national marketplace. It's just common sense and it's the right thing to do," National Association of State Departments of Agriculture President Roger Johnson said.

"We are extremely pleased with this agreement since it will ensure strong food safety standards for meat and poultry products that enter into interstate commerce while at the same time it opens up new opportunities to small processors whose markets have been restricted by the limitations placed on state inspection," Food & Water Watch Executive Director Wenonah Hauter said.

"On behalf of the 6,500 federal meat and poultry inspectors, we at AFGE support this new agreement because it will improve food safety by strengthening federal inspection. The new agreement requires that small meat and poultry plants that want to sell in interstate commerce must comply with federal meat and poultry inspection laws and operate

COALITION FOR FAIR AGRICULTURE & RURAL MARKETS



RESOURCES

LEGISLATION

NDA Interstate Sales Website

- [H.R. 1199](#)
- [H.R. 2513](#)
- [H.R. 2819](#)
- [S. 1149](#)
- [S. 1150](#)

[Rep. Kind Announces New Legislation to Expand Markets for American Producers](#)

[Watch: How Does Interstate Meat Shipment Really Work?](#)

[CFO Press Release](#)

[Katie Press Release](#)

[Rep. Kind Deer Collaboration Letter](#)

[Description of Senate Interstate Legislation](#)

[NASDA Member Meat Sales Testimony to the Senate](#)

[NASDA Press Release April 18, 2007](#)

[Support Senate Bills Taking Priority](#)

[Interstate Taking Priority](#)

GENERAL

[Background & History on Interstate Sales of State-Inspected Meat and Poultry Products and Meat and Poultry Inspection Programs \(March 2007\)](#)

[Max. Number of State-Inspected Meat and Poultry Plants](#)

COALITION RESOURCES

[Coalition Letter to Senate, May 2007](#)

[NASDA STATEMENT ON UFGCA LETTER](#)

[UFGCA and CFA Letter Opposing Interstate](#)

ISSUE PAPERS

[Facts About Meat Inspection Programs](#)

[Interstate Meat Sales: More Competitive Markets](#)

[Interstate Meat Sales: Experts Speak on Benefits and Rural Development](#)

[Interstate Meat Sales: History of Support from USDA and Congress](#)

[Interstate Meat Sales: Focus on Trade](#)

[Interstate Meat Sales: Creating a More Uniform Inspection System](#)

ARCHIVES (2006)

COMPROMISE REACHED ON STATE MEAT INSPECTION

FOR IMMEDIATE RELEASE - October 23, 2007 - Washington, D.C. – A compromise has been reached on allowing interstate shipment of state-inspected meat and the provision will be included in the senate version of the farm bill, says Agriculture Commissioner Roger Johnson.

Johnson, the president of the National Association of State Departments of Agriculture, announced the compromise after a series of meetings in Washington, D.C. last week and further negotiations with consumer, labor and farm groups and Congressional leaders over the weekend.

"The compromise creates a new, optional program within federal law that provides federal oversight of state-inspected facilities that want to ship products across state lines," Johnson said.

Johnson noted that under the compromise, state inspection programs will continue to maintain their current cooperative agreements with the federal government which require state programs to be at least "equal to" federal requirements.

"The goal of this new program is to ensure the safety of meat and poultry products sold in interstate commerce and to open new markets for products from smaller, state-inspected companies," Johnson said.

Processing establishments with up to 25 employees will be eligible to participate in the program. Companies will be required to use a federal mark, stamp, tag or label of inspection.

Johnson has lobbied on behalf of NASDA and state-inspected processing establishments, arguing that these businesses meet or exceed all federal food safety requirements.

"The present system is simply unfair and wrong," he said. "Meat and poultry products from nearly 40 countries can be shipped and sold anywhere in the United States, while state-inspected products are limited to their state of origin." (Contact: Charles Ingram, or Richard Kirchoff, (202) 296-9680) [E2E vision](#)

Consumer, Labor, Farm Groups Agree To Farm Bill Provision - The Interstate Safe Meat And Poultry Inspection Act Of 2007 - Permitting Interstate Sale Of Meat And Poultry From Certain State/Federal Plants

Letter in support for the new program included in the Chairman's mark that permits the interstate shipment of meat inspected by federal and state agencies for certain small establishments

Oct. 12, 2007 - BISMARCK - JOHNSON DEMANDS RETRACTION OF MISLEADING AD [more](#)

Attached: Letter to John Gage, American Federation of Government Employees
Audio: interview Livestock Marketing Association Vice President Nancy Robinson

For more information, please call Patrice Latham (N.D.) at (701) 238-7210 or (701) 320-4357 or Charlie Ingram (D.C.) at (202) 296-9680, charlie@nasda.org.

- * [Support Legislation for Fair Markets, Small Business and Local Economic Growth](#)
- Across the country, there are more than 2,000 state-inspected meat processors—mostly small, family-owned businesses—who are prevented from competing in the national marketplace.
- * [The Facts About Interstate Meat Inspections](#)
- * [Letter from the Coalition for Fair Agriculture and Rural Markets to the Senate](#) urging support for S. 1149 and S. 1150.
- * [NASDA: Meat Inspection Ad Should Be Pulled](#)
- * [NFU to Senate: Support Interstate Meat Shipment](#)
- * [Letter to Consumer Federation of America](#) regarding their ad campaign containing false information about state meat inspection programs and the companies they inspect

To join the coalition to overturn the unfair prohibition on interstate meat sales, please call or email Charlie Ingram at 202-296-9680 or charlie@nasda.org

ACTION ALERT

Contact your House Representatives and Senators!

PETITIONS

[Support Senate Bills Taking Priority](#) [E1](#)

[Support Legislation For Local Economic Growth, Fair Markets, Small Business and Consumers](#)

[Support Interstate Meat Sales Legislation](#)
[H.R. 1199 \(2007\) and S. 1150 \(2007\) in the Senate](#)
[H.R. 1199 \(2007\) and S. 1150 \(2007\) in the House](#)

[Support Interstate Meat Sales Legislation](#)
[S. 1149 \(2007\) and S. 1150 \(2007\) in the Senate](#)
[H.R. 1199 \(2007\) and H.R. 2012 \(2007\) in the House](#)

HOUSE DISTRICT OFFICE LISTING - SENATE DISTRICT OFFICE LISTING
HOUSE AD DISTRICT OFFICE - SENATE AD DISTRICT OFFICES

Coalition Letters and Endorsements

- [Letter to the House](#)
- [Coalition Letter to Senate, May 2007](#)
- [ANMP](#)
- [NFU to Sen. Hatch](#)
- [CFLU to Kind](#)
- [CFLU's Resolution in Support Interstate Sale of State-Inspected Meat](#)
- [CFLU's Resolution in Support Interstate Sale of State-Inspected Meat](#)

COALITION MEMBERS

- American Association of Meat Processors (AAMP)
- American Farm Bureau Federation
- American Grassfed Association
- American Meat Goat Association
- American Sheep Industry Association
- American Veterinary Medical Association (AVMA)
- Association of West Virginia Livestock Auction Markets
- Buckeye Quality Beef Association (QBMA)
- Calaveras County Cattlemen's Association (California)
- Cattle Producers of Washington
- Center for Rural Affairs
- Colorado Association of Meat Processors
- Colorado Independent Cattle Growers Association
- Delaware Rural Action (South Dakota)
- Flights Market (Ohio)
- Georgia Livestock Marketing Association
- Goat and Sheep Producers of Alabama
- Grow Wisconsin Livestock Initiative Consortium
- Illinois Association of Meat Processors
- Independent Cattlemen's Association of Texas
- Independent Cattlemen of Iowa
- Independent Cattlemen of Nebraska
- Iowa Livestock Auction Markets Association
- Iowa Meat Processors Association
- Kansas Cattlemen's Association
- Kansas Livestock Association
- Kansas Livestock Marketing Association
- Kansas Meat Processors Association
- KB Cattle Cattlemen's Association (Colorado)
- Lamb & Lamb Co., Inc. (VA)
- Livestock Marketing Association
- Livestock Marketing Association of Texas
- Louisiana Livestock Marketing Association
- Merced-Marinipa Cattlemen's Association (California)
- Mississippi Cattlemen's Association (Colorado)
- Midwestern Legislative Conference of the Council of State Governments
- Mississippi Livestock Marketing Association
- Missouri Association of Meat Processors
- Missouri Bacon Association
- Montana Cattlemen's Association
- Montana Association of Livestock Auction Markets
- National Association of State Departments of Agriculture (NASDA)
- National Bacon Association
- National Conference of State Legislatures (NCSL)
- National Council of Farmer Cooperatives (NCFU)
- National Family Farm Coalition
- National Farmers Union
- National Grange
- New Mexico Livestock Marketing Association
- New Mexico Cattle Growers' Association
- North American Deer Farmers Association
- North Carolina Livestock Auction Markets Association
- North Dakota Meat Processors Association
- Northeast States Association for Agricultural Stewardship
- Ohio Association of Meat Processors
- Ohio Cattlemen's Association
- Oklahoma Livestock Marketing Association
- Oregon Livestock Producers Association
- SI-CALF United Stockgrowers of America
- South Carolina Association of Meat Processors
- South Carolina Livestock Marketing Association
- Southern Colorado Livestock Association
- Tennessee Goat Producers Association
- Texas Association of Business
- Turkdog Woodworks LLC (VA)
- United States Cattlemen's Association (USCA)
- Vermont Meat and Poultry Processors Association
- Vermont Sheep and Goat Association
- Virginia Livestock Markets Association
- Washington Cattlemen's Association
- Washington County Stockmen's Association (Colorado)
- Western Organization of Resource Councils
- Wisconsin Association of Meat Processors
- Wisconsin Dairy Goat Association
- Wisconsin Sheep Breeders Cooperative
- Wisconsin Pork Association
- Workers Involved in Farm Economics (WIFE)

October 23, 2007

The Honorable Tom Harkin
United States Senate
328A Russell Senate Office Building
Washington, D.C. 20510

The Honorable Saxby Chambliss
United States Senate
416 Russell Senate Office Building
Washington, D.C. 20510

Dear Chairman Harkin and Ranking Member Chambliss:

We, the undersigned organizations, write to express our support for the new program included in the Chairman's mark that permits the interstate shipment of meat inspected by federal and state agencies for certain small establishments.

This compromise is a result of an extensive and inclusive negotiation with all parties contributing to its success. The resulting compromise of these negotiations is good public policy that benefits both consumers and agricultural producers.

We will support this compromise language and oppose all efforts to amend its intent, throughout all consideration of the 2007 Farm Bill. The only exception to this statement would come about as a result of an agreement among all of the signatories on this letter to support a needed change unforeseen at this time.

Thank you again for your assistance.

Sincerely,

National Farmers Union
Consumer Federation of America
National Association of State Departments of Agriculture
American Federation of Government Employees
Food & Water Watch
Center for Science in the Public Interest
National Consumers League
Center for Foodborne Illness Research and Prevention
Government Accountability Project
United Food and Commercial Workers

