Washington, D.C. Office | 653 Constitution Avenue NE | Washington, DC | (202) 546-4046

January 18, 2018

Carmen Rottenberg
Acting Deputy Under Secretary for Food Safety
Food Safety and Inspection Service
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Dear Acting Deputy Under Secretary;

On behalf of the United States Cattlemen's Association (USCA) and its nationwide membership of cow-calf producers, backgrounders and feedlot operators, we respectfully write to express our concerns regarding the Final Report of an Audit Conducted in Brazil: Evaluating the Food Safety Systems Governing Meat Products Exported to the United States of America, conducted May 15-June 2, 2017, as it relates to the overall issue of trade with Brazil.

USCA has been in ongoing communication with the U.S. Department of Agriculture (USDA) and the Food Safety and Inspection Service (FSIS) on the issue of trade with Brazil since the initial trade discussions began. Following the release of this audit, the concerns of U.S. cattle producers have been validated as it is obvious that Brazil failed in several categories regarding its trade with the U.S., including: oversight; statutory authority, food safety and additional consumer protection regulations; sanitation; hazard analysis and critical control points; chemical residue testing programs, and microbiological testing programs.

USCA strongly opposes any reopening of trade with Brazil. The finding of blood clots, bone chips and abscesses in imported beef from Brazil proves that mitigation efforts currently in place are not adequate to keep products that can carry Foot and Mouth Disease (FMD) out of the U.S.

Given the faults noted in the audit report, USCA asks for further information on the following points:

1. Clarification on the location of USDA FSIS product testing procedures, specifically if testing occurs both at the point of departure in Brazil and also at the point of entry in the US.
2. Confirmation on the number of lots/shipments inspected of boneless beef from Brazil since imports first began.
3. Frequency and confirmation of random testing for FMD being conducted at Brazilian processing plants.
4. What assurance does the US have that each carcass is held in Brazil at a specific pH for a specified amount of time? Who provides this information and who evaluates and verifies the information prior to importation?

5. What is the actual number of other rejected shipments found with violations prior to the decision to reject any further shipments of beef from Brazil to the US?
6. What antibiotics, hormones or anthelmentics are used on livestock in Brazil that are illegal for use in/on livestock in the U.S.? If banned in the US, is all beef tested for those products prior to entry into the U.S.?

The health of the U.S. domestic herd depends on a strict adherence to the food safety measures and protocols put in place with respect to meat products imported into the U.S. The items noted above represent ongoing concerns the U.S. cattle industry has with trade with Brazil. The industry and the Administration must work together in order to enhance and strengthen our existing trade and food safety protocols.

The ability to prevent the introduction of foreign animal diseases must be maintained to ensure consumer confidence in that products purchased in the U.S. will not contain items such as blood clots, bone chips, abscesses, or other residues or adulterations that are not acceptable in our country. The U.S. upholds the strictest protocols for animal and food safety, we must ask our trading partners to do the same.

USCA will continue to oppose any efforts to lift the ban on beef imports from Brazil as a direct result of the questions and concerns noted above.

We welcome further discussion on this topic. Please contact me through our Washington, D.C. office at (202) 870-1552, for additional clarification. Thank you for your careful consideration of this critical issue.

Sincerely,

Kenny Graner

Kenny Graner
President
U.S. Cattlemen's Association