The Center for Science in the Public Interest (CSPI)\(^1\) appreciates this opportunity to comment on the Food Safety and Inspection Service’s (FSIS) proposed rule making changes to its import programs [77 Fed. Reg. 70714, Nov. 27, 2012; Docket No. FSIS-2009-2012]. In general, CSPI supports the proposed changes. They will bring greater consistency to the rules governing imported meat, poultry and eggs, provide for more efficient submission of documentation, and address deficiencies in current regulations. With regard to specific areas, CSPI offers the following comments.

1. **Support for improvements to current rules.**

   Electronic submission of certificates of eligibility and inspection combined with the interface between the Public Health Information System (PHIS) Import Component and the Automated Commercial Environment offers the promise of increased efficiency and better use of resources. We agree with the statement in the rule that FSIS should not reduce the number of import inspectors based on such efficiencies. FSIS should consider a stronger statement that it will reinvest time saved on data entry in increased levels of inspection. This has not been the trend for the agency. Between fiscal years 2006 and 2008 the percentage of shipments re-

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\(^1\) CSPI is a non-profit consumer advocacy and education organization that focuses largely on food safety and nutrition issues. It is supported principally by the 900,000 subscribers to its *Nutrition Action Healthletter* and by foundation grants.
inspected by FSIS fell from 14 percent to 9 percent.\(^2\) To the extent the electronic submission frees up personnel to reverse this trend, CSPI believes this change should benefit consumers.

CSPI also supports these other provisions:

- Ending the practice of allowing foreign governments to guarantee replacement of lost or incomplete inspection certificates.
- Including information on the type of operation, eligibility status and species and types of products produced on certificates of eligibility.
- Requiring information on the source of materials that originate from a country other than the exporting country.
- Requiring import establishments to have sanitation standard operating procedures.

These provision will reduce the risk of unsafe product entering commerce and provide FSIS with more information on the establishments that export product to the U.S. Each has safety benefits for consumers.

2. **Areas of concern: Canada, Consignee Address, Government Seal**

*Canada* – The proposed rule deletes the discontinued program of streamlined inspection procedures for products imported from Canada. While this is a good housekeeping measure, it has implications for other efforts to relax border inspections. CSPI is following the Beyond the Border Initiative preclearance pilot program with great interest and concern. FSIS should treat the failure of the streamlined procedures program as cautionary to moving forward too hastily with the preclearance pilot program.

*Consignee Address* – CSPI supports the decision to require inspection certificates to include the name and address of the exporter, importer, consignor and consignee. This addresses inconsistent requirements in the meat and poultry rules and provides greater accountability. We are concerned by the proposal to delete the product destination requirement. This appears to be based on an assumption that the consignee address is always the same as the physical destination of the food. However, the consignee’s business address may differ from the address where a

product is going to be processed or distributed. FSIS should continue to require the destination address if that address differs from the consignee’s business address.

**Government Seal** – FSIS proposes to end a requirement for a government seal on inspection certificates. This fails to appreciate the legal importance of a seal. A seal serves to authenticate the government document. It also provides evidence that action was taken by the government and that the certificate is not forged or does not otherwise include fraudulent information. These are important considerations that should not be dismissed by FSIS as unimportant. Until FSIS can develop a more legally sound and factual basis for discontinuing the practice, the rule should require any certification to carry the seal of the government agency producing it.

FSIS plays a critical role in assuring consumers of the safety of imported meat, poultry and egg products. The proposed changes to rules on import and inspection certification are positive steps to carrying out that role in a manner that is efficient and delivers benefits to consumers. To further assure those benefits are realized, CSPI encourages FSIS to consider revisions consistent with the concerns addressed above.

Respectfully,

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