

April 7, 2004

The Honorable Ann M. Veneman
Secretary, Department of Agriculture
14th and Independence, SW
Washington, DC 20250

The Honorable Robert Speller
Minister of Agriculture & Agri-Food
930 Carling Avenue
Ottawa, Ontario
K1A 0C5

Dear Secretary Veneman and Minister Speller:

The undersigned organizations, representing the beef producers and processors in the U.S. and Canada, are writing to request the harmonization of the food safety regulations enforced by your respective organizations. Although significant progress has been made in the last three months toward this goal, there remain areas in need of further attention.

In that regard, an issue warranting further discussion and change involves identifying the distal ileum as a specified risk material (SRM) and the scope of that requirement. The Canadian Food Inspection Agency (CFIA) regulation lists the distal ileum of all cattle as a SRM, yet CFIA policy requires removing the entire small intestine. The interim final rule published by the Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture, also established that the distal ileum is a SRM, with the regulation requiring removal of the entire small intestine. Although the net effect of the two organization's approaches is effectively the same, one is implemented through a regulation, while the other is implemented as a policy directive.

We agree that the distal ileum should be classified as a SRM. However, the regulatory and policy requirements in place in the U.S. and Canada requiring removal of the entire small intestine to ensure that the distal ileum is removed is unwarranted and not based on science. The distal ileum is only a small part of the small intestine and can be scientifically defined and removed. The remaining portion of the small intestine is a highly useful and valuable product that is safe. Protocols exist that have been implemented to accomplish the goal of food safety and those protocols could be adopted in both countries.

We, and other interested parties, have or will be providing more details to both governments regarding protocols that could be adopted. We urge both governments to work together to evaluate this situation and change this requirement to allow a portion of the small intestine to continue to be used.

Sincerely,

American Meat Institute
Canadian Cattlemen's Association
Canadian Meat Council
National Cattlemen's Beef Association

Cc:

Mr. Richard Fadden, President, CFIA

Mr. Paul Haddow, Executive Director of International Affairs, CFIA

Mr. Robert Carberry, Vice-President, Programs, CFIA

Dr. Brian Evans, Executive Director, Animal Products Directorate, CFIA

Dr. Merv Baker, Director, Food of Animal Origin Division, CFIA

Dr. J.B. Penn, Under Secretary of Farm and Foreign Agricultural Services, USDA

Dr. Elsa Murano, Under Secretary for Food Safety, USDA

Mr. Bill Hawks, Under Secretary for Marketing and Regulatory Programs, USDA

Dr. Barbara Masters, Acting Administrator, Food Safety and Inspection Service, USDA

Dr. Peter Fernandez, Acting Administrator, Animal and Plant Health Inspection Service, USDA

Dr. Ron DeHaven, Deputy Administrator, Veterinary Services, APHIS, USDA