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FOOD SAFETY

Procedures for Inspecting Canadian Meat Imports

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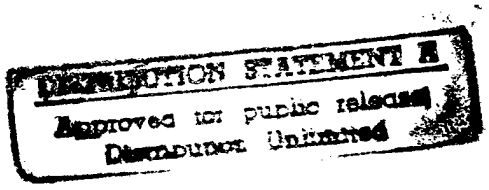

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Mr. Chairman and Members of the Committee:

We are pleased to be here today to respond to your inquiries about the U.S. system for inspecting Canadian meat imports. You asked us to (1) describe FSIS' system for selecting and inspecting imported meat products, (2) determine the availability of equipment at import inspection facilities along the Canadian border that would enable the full inspection of meat shipped in trucks, and (3) assess the effectiveness of FSIS' new procedure to verify that carcass samples selected by Canadian inspectors are representative of the entire shipment.

To respond to these questions, we visited 5 of the 21 FSIS-approved import inspection facilities located along the U.S./Canada border and a Canadian slaughterhouse, where we observed the inspection and sampling processes. In addition, we met with FSIS officials and current and former import inspectors to discuss the import inspection process. We also reviewed the availability of equipment required to unload carcasses at import inspection stations and FSIS' data on the quality of Canadian sampling.

In summary, FSIS considers the eligible foreign countries' inspection system—not its own reinspection at the port of entry—to be the primary control for ensuring that imported meat products meet U.S. standards. As a check on the foreign countries' inspection performance, FSIS requires that every shipment of imported meat, including shipments from Canada, receive some level of U.S. inspector review at the border. All Canadian meat shipments receive a visual check for container damage and inaccurate labeling or paperwork. Further, a sample of Canadian meat shipments (about 11 percent of total Canadian meat shipments in calendar year 1996) receive a more intensive examination.

The sampling approach used to perform this more intensive examination varies by the type of product being shipped. For meat shipped in containers, such as boxed ground beef or palletized bins of canned corn beef, FSIS inspectors unload the entire shipment and select and examine a random sample of the product. For meat carcasses, FSIS inspectors select samples from the back of the trailer because the existing inspection facilities lack the equipment needed to unload an entire shipment of meat carcasses. To facilitate its sample inspection of meat carcasses, starting February 16, 1997, FSIS began requiring that Canadian inspectors located at Canadian slaughter plants select a random sample of carcasses and place them at the back of the trailers in which they are to be shipped. The FSIS

import inspector at the border will then examine the Canadian-selected samples. To verify that the Canadian sample selection is unbiased, FSIS inspectors also examine at U.S. destinations, about 15 carcass shipments per month that were not examined at the border. For these verifications, FSIS inspectors randomly select a sample of carcasses from the shipment, examine that sample and the Canadian selected sample and compare the results of the sample examinations. These data will be accumulated over time to verify that the Canadian samples are representative of entire shipments. While little experience has been gained since the new procedures took effect in February, an FSIS pilot test of the procedures found no evidence of bias in Canadian sampling.

Background

The Federal Meat Inspection Act requires that meat imports meet U.S. standards for wholesomeness and be produced under inspection systems that are equivalent to the U.S. system. Under the act, FSIS reviews the inspection systems of exporting countries for equivalency with the U.S. system and reinspects imported meat at the port of entry as a spot-check of the countries' inspection performance. FSIS conducts two types of spot checks which are commonly referred to as "skip" assignments and "inspect" assignments. Skip assignments require a visual check for container damage and inaccurate labeling or paperwork. Inspect assignments require an FSIS import inspector to conduct the labeling, paperwork and container review associated with a skip assignment and to (1) randomly select and examine product samples and (2) sometimes randomly select and send product samples to an FSIS laboratory for testing. In a product examination, the inspector feels, smells, and visually examines exposed product samples to discover defects such as blood clots, bone fragments, extraneous materials, feces, hair, and lesions.

Canada, generally speaking, is subject to the same requirements as other exporting countries, but is granted certain exceptions. One such exception is that for meat carcasses shipped from Canada, Canadian inspectors, not FSIS inspectors, typically select the carcass samples to be examined by FSIS. In accordance with one goal of the 1988 U.S./Canada Free Trade Agreement—facilitate commerce by reducing trade barriers—both countries sought agreement to minimize inspection procedures applicable to each other's meat imports.

Automated System Determines Type of Inspection for Imports

For meat being imported from all countries, FSIS relies on its Automated Import Information System to automatically assign the type of reinspection that an FSIS import inspector will perform on an incoming shipment. The automated assignment system works in two ways. When non-Canadian shipments arrive at a U.S. port of entry, a description of the shipment is entered into the automated system and the type of reinspection is automatically assigned. The proportion of skip assignments and inspect assignments will vary with the product type, country of origin and meat producer. In calendar year 1996, approximately 70 percent of meat shipments from countries other than Canada were given a skip and 30 percent were given the more intensive inspect assignment.

For Canadian shipments, the process is modified. Rather than assigning inspections on the basis of the product type, the automated system is programmed to (1) randomly generate about 3,000 inspect assignments annually, at a rate of about 250 per month, and (2) automatically generate inspect assignments for those meat producers that are placed in intensified inspection status because of recent compliance problems.[1] For calendar year 1996, approximately 89 percent of Canadian meat shipments received skip assignments and 11 percent received inspect assignments (7 percent triggered by random assignments and 4 percent triggered by previous compliance problems). Skip assignments for Canadian shipments also differ from those for other countries in that rather than unloading the shipment, inspectors check only what is visible when the rear doors of the trailer are opened.

As with imports from other countries, an inspect assignment for Canadian meat shipments (for other than meat carcasses) requires that the entire shipment be unloaded from the truck so that the inspector can randomly select samples and perform specified product examinations. As discussed below, however, entire Canadian shipments of meat carcasses are not unloaded because of the limited equipment at the border inspection facilities.

[1]If a shipment of imported meat is refused entry, the foreign meat producer is placed on "intensified" inspection status. Non-Canadian meat producers, depending on the reason for refusal and the type of product refused, will automatically receive an inspect assignment until the next 10 to 15 shipments of that product pass inspection. For Canadian meat producers, 15 consecutive shipments of the refused product—equaling at least 15 times the weight of the refused shipment—must pass inspection regardless of product type or reason for refusal.

Border Inspection Facilities Lack Equipment Needed to Unload Canadian Carcass Shipments

Only 1 of the 21 FSIS-approved inspection facilities along the U.S./Canadian border has the necessary equipment to unload an entire shipment of meat carcasses. As a result, unlike non-carcass shipments, Canadian meat carcass shipments are not entirely unloaded at any of the border inspection facilities.

Our analysis of FSIS data and our observations at the inspection facilities we visited confirmed that only one inspection facility located on the U.S./Canada border (facility number I-47 in Sweetgrass, Montana) had sufficient overhead rail capacity to hang an entire truckload of meat carcasses. Nine of the border inspection facilities had no rail capacity, and the remaining 11 facilities had rail capacity ranging from 16 to 100 feet in length. Because meat carcasses are generally shipped in trailers having a total rail length of about 160 feet, the rail capacity at these facilities is not adequate to handle a full shipment of carcasses.

FSIS-approved import inspection stations have never been required to have the overhead rail capacity needed to unload a full truckload of carcasses. In January 1989 the United States and Canada, responding to the goals of the U.S./Canada Free Trade Agreement, implemented new meat inspection procedures for meat products traded between the two countries. According to the FSIS Import Inspection Director, prior to 1989, Canadian meat carcasses were inspected at their U.S. destination, rather than at the border.[2] In January 1989, FSIS moved its inspection activities for imported Canadian meat to approved privately built and operated inspection facilities located along the U.S./Canada border. However, the privately owned facilities were only required to have enough overhead rail capacity to unload the Canadian-selected carcass samples for FSIS inspectors' examination. In July 1992 FSIS discontinued Canadian sample selection in response to issues we raised during our 1992 report on Canadian meat inspection.[3] In that report we expressed concern about giving advance notice of inspection to Canadian meat plants and having Canadian inspectors select samples for U.S. inspection. Because the import facilities lacked the equipment to unload full carcass shipments, FSIS import inspectors started selecting their own samples from the carcasses accessible at the rear of a truck.

[2]Currently, two U.S. destination facilities are authorized to conduct import inspections. Canadian importers may request inspection at these facilities, rather than at the port of entry.

[3]Food Safety and Quality: USDA Improves Inspection Program for Canadian Meat, But Some Concerns Remain (GAO/RCED-92-250, Aug. 26, 1992).

After discontinuing Canadian sample selection and eliminating the advance notice of inspection to Canadian meat plants, FSIS import inspection officials told us that they had made a number of unsuccessful attempts to provide for random sampling of carcass shipments at the border. For example, around August 1993, FSIS proposed to Canadian inspection and meat industry officials that carcasses be unloaded for random selection and that inspection facilities be upgraded for this purpose. The proposal was dropped because (1) industry and Canadian government officials were concerned about shipment delays and potential adverse impacts on meat hygiene, and (2) import inspection facility owners objected to the increased costs associated with providing the additional equipment and staff that would be needed to unload an entire truckload of meat carcasses.

A second FSIS proposal, made in December 1993, to sample carcasses from randomly selected sections of truck trailers was also abandoned when it was determined that the trailers might become unbalanced, creating a safety hazard. FSIS officials concluded that unloading entire carcass shipments at the border inspection facilities was (1) unnecessary, given the U.S.-equivalent Canadian inspection process before shipment and (2) more risky, given the increased potential contamination and spoilage associated with additional handling.

New Verification Procedure Checks Canadian Carcass Sample Selection

FSIS recently revised its procedures for Canadian carcasses imports to again allow for Canadian inspectors to select the samples that will be examined by FSIS inspectors. The revised procedures also establish a system for FSIS to verify that the Canadian-selected carcass samples are representative of the entire shipment. Effective February 16, 1997, Canadian meat producers exporting meat to the U.S. are required to place, at the rear of every truckload, marked carcasses that were randomly selected by a Canadian government inspector. These are the carcasses that will be examined by the FSIS import inspector if an inspect assignment is drawn from the automated system at a U.S. border inspection facility.

However, unlike the inspection procedures that were in place prior to July 1992, Canadian plants are not provided advance notice of inspections and FSIS has implemented a process to verify that the Canadian selected samples are unbiased. To verify that Canadian samples are representative of shipments, 15 shipments a month that receive skip assignments at the border will be resealed and sent to their U.S. destination, where they will be met by an FSIS import inspector. The inspector will unseal the truck,

remove the Canadian selected sample, randomly select another sample from the remaining carcasses, and compare the inspection results from the two samples. The results of the verifications will be accumulated over time to statistically gauge the reliability of the Canadian sampling process. If the cumulative verification results exceed the pre-set limit of variation established by FSIS, there is evidence of possible bias in the Canadian sample selection process. Results will be compiled for individual Canadian slaughterhouses to ensure that the Canadian sample selection process is unbiased.

FSIS and Canadian inspection officials conducted a 60-shipment pilot test of the new verification procedure from July 10, 1995, to October 16, 1995. The test involved one of the largest Canadian meat producers and two U.S. destination plants. The results of the pilot test indicated that Canadian sampling was unbiased and that the verification procedure is an effective means for ensuring that Canadian-selected samples are representative.

This concludes our prepared statement. We would be happy to respond to any questions you or members of the committee may have.