

Prepared Meat Products in the Global Marketplace

Regulatory Considerations

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Introduction

It is time to change the term Processed Meat Products to a more consumer friendly term such as Prepared Meat Products. In fact, Prepared Meat Product was the name used in describing the manufacturing procedures for these products many years ago (MacKenzie, 1966). Having made a pitch for a more consumer appropriate name change for this category of meat products, this presentation will be focused on regulatory issues of meat product importation rather than specific standards of identity.

Product composition and labeling requirements of prepared meat products have been defined in a number of publications and summarized by deHoll, 1993. First of all, what volumes of products are involved in prepared meat product importation and exportation? As indicated in Table 1, the volume of imported prepared meat products was about 100,000 metric tons for each of the last two years. The volume of exported products (Table 2) increased in 1997 to about 165,000 metric tons. However, these volumes do not include the meat ingredients imported for finished product manufacture. Therefore, it is important to understand the rules and regulations governing meat raw material (for processing) and finished meat product importation in the United States.

The three U.S. government agencies responsible for uniformly applying these rules and regulations include the Animal and Plant Health Inspection Service (APHIS), Food Safety and Inspection Service (FSIS), and the United States Customs Service. The review of each agency's function will be made separately.

Animal and Plant Health Inspection Service

APHIS has the responsibility of promulgating and enforcing regulations protecting the livestock population in the United States. This protection is especially important in preventing the introduction of animal diseases not currently present or prevalent in this country. A recent change

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Reciprocal Meat Conference Proceedings, Volume 51, 1998.

Table 1. Volume of Imported Prepared Meat Products (metric tons)

Products	1996	1997 ²
Prepared Beef & Veal (not canned)	3,534	4,150
Canned Corned Beef	31,818	29,120
Cured Hams/Shoulders	58,947	61,350
Cured Bacon	11,580	9,817
Beef/Pork Sausages	4,057	4,071
Total	109,936	108,508

¹ Source: U.S. Department of Commerce, Bureau of Census

² Estimate based on 11 months actual volume, projected to 12 months

Table 2. Volumes of Exported Prepared Meat Products (metric tons)¹

Products	1996	1997 ²
Cured Hams / Shoulders	9,733	9,231
Cured Bacon	15,838	12,380
Canned Prepared Pork	7,541	8,740
Non-Canned Prepared Pork	5,343	7,940
Sausages and Bologna	92,476	126,587
Total	130,931	164,878

¹ Source: U.S. Department of Commerce, Bureau of Census

² Estimate based on 11 months actual volume, projected to 12 months

significantly influences the import regulations that were based on the North American Free Trade (NAFTA) and the General Agreement on Tariffs and Trade (GATT) Uruguay Round of Multilateral Trade Agreements. These agreements contained provisions establishing new rights and obligations of the participating countries regarding sanitary and phytosanitary (SPS) regulations.

On April 18, 1996, APHIS issued a proposed rule to amend the regulations concerning the importation of animals and animal products by applying the scientific principles of regionalization based on risk (USDA, 1996). This rule, which became final on October 28, 1997, allowed APHIS to establish regional and area boundaries throughout the world instead of country boundaries to determine the acceptability of animal and animal products being imported into the United States (USDA, 1997d and USDA, 1997e). As APHIS noted in the proposed rule and public hearings, this risk management system would provide the basis for other foreign countries to formulate similar regionalization rules. This new rule would then allow the

United States, in the unlikely event that a region of the country experienced an outbreak of a reportable disease, to export product from unaffected U.S. regions.

The regional risk classifications are presented in Table 3. Under this rule, a region in which it was determined that a certain disease did not exist would be classified as one of three different risk class levels: negligible risk (RN), slight risk (R1), or low risk (R2). Differences in risk level are determined by the likelihood that a disease might be introduced into the region. Using this same approach, there are two risk classifications for regions in which a disease is known to exist: moderate risk (R3) and high risk (R4). The final risk class, RU, represents a region in which a quantitative risk assessment (QRA) has not been made and/or the region does not have a surveillance or control program. Regional risk assessments are made by APHIS through on-site inspection and verification of surveillance and control programs.

Using this regionalization risk assessment approach, changes in meat export requirements for Argentina, Mexico, and the European Union (EU) have been made over the last year. For example, Argentina has been free of Foot-and-Mouth Disease (FMD) since 1994. This eradication was facilitated by a comprehensive vaccination program. As a result, the regulations were amended regarding the importation of meat and meat products from Argentina. In 9 CFR part 94, a new section (Section 94.21) was added allowing, under certain conditions, the importation of fresh, chilled or frozen beef from Argentina (USDA, 1997b). This amended regulation was further modified to allow the importation of cured or cooked beef from Argentina, provided

Table 3. Regional Risk Classifications

Risk Class	Qualitative Risk Assessment	Quantitative Risk Assessment
RN	Negligible	<1 per 10 ⁻⁶
R1	Slight	<1 per 10 ⁻⁵
R2	Low	<1 per 10 ⁻⁴
R3	Moderate	<1 per 10 ⁻³
R4	High	<1 per 10 ⁻²
RU	Unknown/Unclassified	>1 per 10 ⁻² or unknown

it satisfied the same requirements as for fresh, chilled, or frozen beef (USDA, 1997c).

Similarly, the State of Sonora, Mexico was classified as a slight risk (R1) region for hog cholera. Therefore, the regulations were amended to permit, under specific conditions, the importation of fresh, chilled, or frozen pork from the State of Sonora, Mexico into the United States (USDA, 1997a).

More recently, the issue of bovine spongiform encephalopathy (BSE) has led to a specific ban against the importation of meat products from ruminant animals, regardless of thermal processing procedures, from the regions known to be affected by BSE including Belgium, France, the Republic of Ireland, Luxembourg, Oman, The Netherlands,

Portugal, Switzerland, and the United Kingdom. Ruminant meat product imports also were prohibited from other European countries because of inadequate controls or surveillance programs (USDA, 1998).

Only after APHIS completes an animal disease risk assessment can a country or region be approved to export live animals or animal derived products to the United States.

Food Safety and Inspection Service (FSIS)

After the completion of the disease risk classification by APHIS for a given disease and region, it then becomes the role of FSIS to approve the meat safety inspection system and meat manufacturing plants within the country in question (9 CFR, 327.2, 1997). To be approved, FSIS must conclude that the foreign inspection system maintains a program that assures that the inspection requirements are at least equivalent to those of the Federal system of meat inspection in the United States.

The foreign country eligibility requirements for importing animals and animal products to the United States are summarized in Table 4. It should be noted that approved foreign animal and meat processing establishments must operate under a Hazard Analysis and Critical Control Point (HACCP) system.

Meat products imported to the United States from a foreign country must be accompanied by a foreign meat

Table 4. Foreign Country Eligibility Requirements For Importation of Products to the United States

1. Program organized and administered by the national government.
2. Competent, qualified inspectors.
3. Authority and responsibility to enforce meat inspection laws and regulations.
4. Inspection, sanitation, quality, species verification, and residue standards.
5. Establishments within a country must be approved for sanitation and sanitary handling of product.
6. Maintenance of eligibility by periodic reviews.

inspection certificate (Figure 1). The certificate must bear the official seal of the national government of the foreign country in which the product was inspected, signed by an authorized government official, and written in both English and the language of the foreign country of origin. This certificate must be presented to the import inspector at the time the product is offered for entry to the United States because inspection of the product will not commence without this documentation. The product label must give country of origin, preceded by the words "product of", the establishment number, official inspection seal of the foreign meat inspection system, and the product name plus

an ingredient statement if applicable, package weight, production date code, and shipping lot number (Figure 2). Import inspection will be refused for any product that is not properly labeled and/or the meat inspection certificate does not contain the label marks and lot number identification.

FSIS conducts the import inspection and completes the Import Inspection Application and Report, FSIS Form 9540-1. This form contains the shipment identification numbers

Original
OFFICIAL MEAT-INSPECTION CERTIFICATE FOR MEAT FOOD PRODUCTS

Place _____ (City)
(Country) _____ (Date) _____

I hereby certify that the meat food products herein described were derived from livestock which received ante-mortem and post-mortem veterinary inspections at time of slaughter in plants certified for importation of their products into the United States, were handled in a sanitary manner, and were prepared under the continuous supervision of an inspector under control of the national meat inspection system and that said meat food products are not adulterated or misbranded as defined by the regulations governing meat inspection of the U.S. Department of Agriculture, and are otherwise in compliance with requirements equivalent to those in the Federal Meat Inspection Act and said regulations.

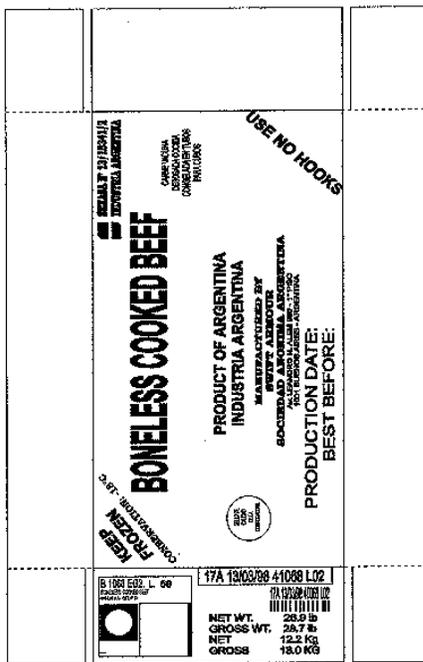
I further certify that all products herein described that are prepared customarily to be eaten without cooking and contain muscle tissue of pork were treated for destruction of trichinae as prescribed in § 318.10 of the Meat Inspection Regulations of the U.S. Department of Agriculture.

Kind of product	Species of live-Stock derived from	Number of pieces or containers	Weight

Identification marks on products and containers _____

Consignor _____
Address _____
Establishment number _____
Consignee _____
Destination _____
Shipping marks _____
(Signature) _____
(Name of official authorized by the national foreign government to issue inspection certificates for meat food product exported to the United States) _____
(Official title) _____

Figure 2



and disposition information after inspection is completed. The FSIS inspector informs U.S. Customs of inspection results as either U.S. inspected and passed or U.S. inspected and refused entry. In certain cases, a meat product may be passed pending laboratory analysis. If the lab results indicate a problem, then this product is considered U.S. product and cannot be shipped back to the originating country. The product must then be disposed in accordance with USDA-FSIS domestic policy. The sampling plans and inspection criteria are contained in the USDA Import Inspection Division Manual.

United States Customs Service

After the product has cleared FSIS inspection, the U. S. Customs Service assesses and collects customs duty. The import duties are assessed in accordance with the Harmonized Tariff Schedule for United States, 1998. Chapter 16 of the tariff schedule specifies the tariff rates for meat and poultry products. It is important to properly classify the imported meat product as tariffs differ according to product type. Product composition, individual package weight, packaging (airtight versus non-airtight), and special trade agreements (such as NAFTA) influence the tariff levied.

Prepared Meat Product Export to Foreign Countries

The requirements for exporting prepared meat products to foreign countries are summarized in Table 5. Basically, the procedures are the reverse of the U.S. importation requirements.

Summary

The world market has become a smaller and more ac-

Table 5. Foreign Country Eligibility Requirements For Importation of Products to the United States

1. U.S. inspection and control programs approved by the foreign country.
2. Meat processing plants approved for export by the foreign country.
3. Product label and manufacturing procedure approved by the foreign country.
4. Conform to the foreign country's tariff and quota requirements.
5. Obtain an authorized export certificate from the FSIS inspector in charge.



cessible place with improvements in transportation and the explosion in world-wide computerized communications. Information about meat technology as well as the regulatory information that governs meat imports and exports is dynamic. New trade initiatives which include the North American Free Trade and Uruguay Round of Multilateral Trade Negotiations agreements have been signed, and were designed to encourage more unrestricted trade among participating countries. Therefore, it is important to completely understand the functions and safeguards the U.S. government has in place regarding the importation and exportation of meat raw materials and prepared meat products. It can be an expensive proposition for a company if product is refused entry because of non-conformance to the regulations. In short, APHIS is concerned with animal health, FSIS with human health, and U.S. Customs with maintaining a level economic playing field.

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