

February 11, 2013

Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250-3700

Dear Mr. Secretary:

On behalf of the undersigned trade associations, we write to express our concerns with the possibility of furloughing the nation's federal meat, poultry, and egg products inspectors in the event sequestration goes into effect. We understand the United States Department of Agriculture (USDA) is considering implementing a sequestration plan that would result in furloughing all the Food Safety and Inspection Service's (FSIS's) meat, poultry, and egg products inspectors for 15 days. Because of the importance of federal inspection to the production of meat, poultry, and egg products, we do not believe furloughing FSIS inspectors to be an appropriate response to sequestration within the framework of the federal meat, poultry, and egg products inspection laws. It certainly would not be in the public interest.

Because federal establishments may not produce meat, poultry, or egg products without federal inspection, furloughing inspectors would effectively shutter meat, poultry, and egg products plants for more than two weeks, imposing significant hardship on thousands of inspected establishments and hundreds of thousands of people directly employed by these industries, not to mention the affected government employees. Moreover, furloughing inspectors would have devastating trickle-down effects: Farmers raising livestock and poultry would have nowhere to send their animals and would have to shoulder substantial losses. With nowhere for livestock and poultry to go, animal care would become more challenging. The robust U.S. export trade in meat, poultry, and egg products would all but dry up, and imports would be halted at the border. Schools and other public institutions relying on contracted-for meat and poultry products may not be able to obtain alternate sources of affordable, wholesome protein. And, most alarming, American consumers could face their first widespread shortage of meat, poultry, and egg products in generations.

Given the significant disruption to the lives of millions of American citizens and millions of dollars of economic harm that would result, we firmly disagree that furloughing FSIS inspectors is an appropriate or necessary response to sequestration. Even when the federal government has shut down due to lack of appropriations, FSIS inspectors were among the "essential" federal employees who stayed on the job. FSIS's plans for a potential shutdown in April 2011, for example, declared FSIS inspectors "necessary to protect Life and Health" and "essential to the Nation's food safety operations." We fail to see how employees performing such a critical function as to be exempted from a full government shutdown should be furloughed to make up a budget shortfall.

Finally, furloughing FSIS inspectors would be inconsistent with the mandates of the Federal Meat Inspection Act, the Poultry Products Inspection Act, and the Egg Products Inspection Act, which prohibit the production, processing, or interstate distribution of meat, poultry and egg products without federal inspection. Of significance and as USDA itself has acknowledged in the past, these laws require USDA to provide inspection at government expense.

We recognize that sequestration presents significant challenges that require USDA and all other federal government agencies to make difficult decisions to prioritize resources. But cutting an essential, legally mandated program such as food safety inspection is not the way to address the government's budget deficit. We urge USDA to examine all options available to meet its obligations under sequestration while upholding its commitment to ensuring that American consumers have access to the safe, wholesome, and nutritious protein sources they have come to expect from the nation's meat, poultry, and egg products industries.

We appreciate your continued strong support and commitment to the food safety inspection system and thank you for your consideration. We would be pleased to meet with you to discuss our concerns in more detail.

Sincerely,

Agricultural & Food Transporters Conference
of the American Trucking Associations
Alabama Poultry & Egg Association
California Poultry Federation
Chicken and Egg Association of Minnesota
Delmarva Poultry Industry, Inc.
Florida Poultry Federation
Food Marketing Institute
Georgia Poultry Federation
Grocery Manufacturers Association
Indiana State Poultry Association
International Foodservice Distributors
Association
Iowa Poultry Association
Kentucky Poultry Federation
Louisiana Poultry Federation
Meat Import Council of America, Inc.
Minnesota Turkey Growers Association
Mississippi Poultry Association
National Cattlemen's Beef Association
National Chicken Council
National Grocers Association

National Poultry & Food Distributors
Association
National Pork Producers Council
National Restaurant Association
National Turkey Federation
North American Meat Association
North Carolina Poultry Federation
Ohio Poultry Association
Pet Food Institute
South Carolina Poultry Federation
Southwest Meat Association
Snack Food Association
Tennessee Poultry Association
Texas Poultry Federation
The Poultry Federation
USA Poultry and Egg Export Council
United Egg Association
United Egg Producers
U.S. Meat Export Federation
U.S. Poultry and Egg Association
Virginia Poultry Federation

CC:

Hon. Debbie Stabenow, United States Senate
Hon. Thad Cochran, United States Senate
Hon. Frank Lucas, United States House of Representatives
Hon. Collin Peterson, United States House of Representatives
Dr. Elisabeth Hagen, Undersecretary for Food Safety, United States Department of Agriculture
Alfred V. Almanza, Administrator, Food Safety and Inspection Service

Jeffrey Zients, Deputy Director for Management, Office of Management and Budget