

1010
9544
Ag 8/1
R 11/3

Y4 .Ag 8/1 : R 11/3

MANDATORY INSPECTION OF RABBIT MEAT

GOVERNMENT

Storage

DOCUMENTS

SEP 29 1977

FARRELL LIBRARY
KANSAS STATE UNIVERSITY

HEARING

BEFORE THE

SUBCOMMITTEE ON LIVESTOCK AND GRAINS

OF THE

COMMITTEE ON AGRICULTURE

HOUSE OF REPRESENTATIVES

NINETY-FIFTH CONGRESS

FIRST SESSION

ON

H.R. 2521

FEBRUARY 22, 1977

Serial No. 95-O

KSU LIBRARIES



009000 300830
00611A



Printed for the use of the Committee on Agriculture

U.S. GOVERNMENT PRINTING OFFICE

WASHINGTON : 1977

94-884 O

COMMITTEE ON AGRICULTURE

THOMAS S. FOLEY, Washington, *Chairman*

W. R. POAGE, Texas,
Vice Chairman

E DE LA GARZA, Texas
WALTER B. JONES, North Carolina
ED JONES, Tennessee
DAWSON MATHIS, Georgia
GEORGE E. BROWN, Jr., California
DAVID R. BOWEN, Mississippi
CHARLES ROSE, North Carolina
JOHN BRECKINRIDGE, Kentucky
FREDERICK W. RICHMOND, New York
RICHARD NOLAN, Minnesota
JAMES WEAVER, Oregon
ALVIN BALDUS, Wisconsin
JOHN KREBS, California
TOM HARKIN, Iowa
JACK HIGHTOWER, Texas
BERKLEY BEDELL, Iowa
MATTHEW F. McHUGH, New York
GLENN ENGLISH, Oklahoma
FLOYD J. FITHIAN, Indiana
JOHN W. JENRETTE, Jr., South Carolina
RAY THORNTON, Arkansas
LEON E. PANETTA, California
IKE SKELTON, Missouri
JOSEPH S. AMMERMAN, Pennsylvania
JERRY HUCKABY, Louisiana
DAN GLICKMAN, Kansas
DANIEL K. AKAKA, Hawaii
HAROLD L. VOLKMER, Missouri
CHARLES WHITLEY, North Carolina

WILLIAM C. WAMPLER, Virginia,
Ranking Minority Member

KEITH G. SEBELIUS, Kansas
PAUL FINDLEY, Illinois
CHARLES THONE, Nebraska
STEVEN D. SYMMS, Idaho
JAMES P. JOHNSON, Colorado
EDWARD R. MADIGAN, Illinois
MARGARET M. HECKLER, Massachusetts
JAMES M. JEFFORDS, Vermont
RICHARD KELLY, Florida
CHARLES E. GRASSLEY, Iowa
TOM HAGEDORN, Minnesota
W. HENSON MOORE, Louisiana
E. THOMAS COLEMAN, Missouri
RON MARLENEE, Montana

PROFESSIONAL STAFF

FOWLER C. WEST, *Staff Director*
ROBERT M. BOR, *Counsel*
HYDE H. MURRAY, *Counsel*
JOHN R. KRAMER, *Special Counsel*
L. T. EASLEY, *Press Assistant*

SUBCOMMITTEE ON LIVESTOCK AND GRAINS

W. R. POAGE, Texas, *Chairman*

JAMES WEAVER, Oregon
TOM HARKIN, Iowa
JACK HIGHTOWER, Texas
BERKLEY BEDELL, Iowa
GLENN ENGLISH, Oklahoma
FLOYD J. FITHIAN, Indiana
IKE SKELTON, Missouri
DAN GLICKMAN, Kansas
E DE LA GARZA, Texas
ED JONES, Tennessee
DANIEL K. AKAKA, Hawaii

KEITH G. SEBELIUS, Kansas
CHARLES THONE, Nebraska
JAMES P. JOHNSON, Colorado
TOM HAGEDORN, Minnesota
E. THOMAS COLEMAN, Missouri

CONTENTS

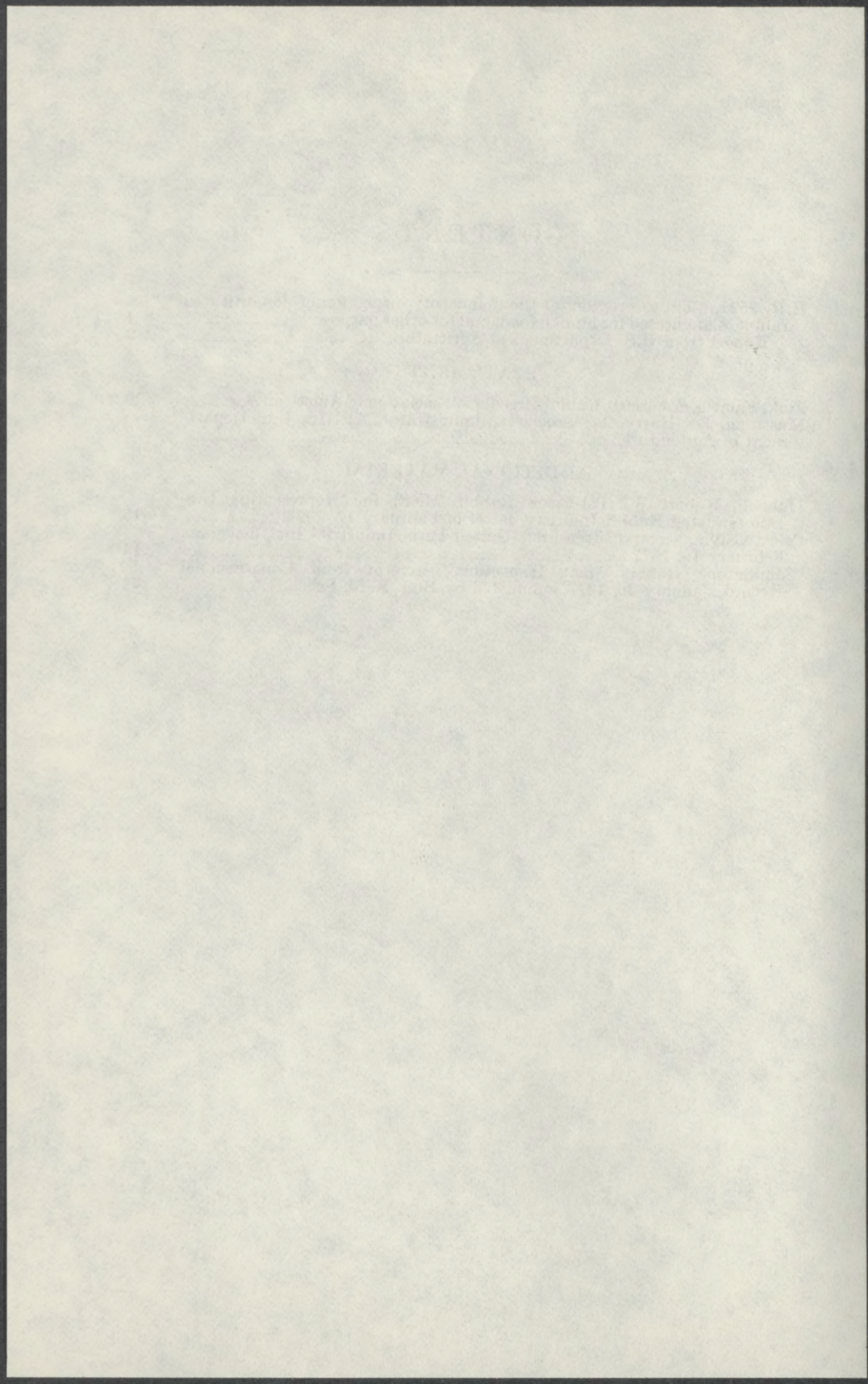
H.R. 2521, a bill to provide for the mandatory inspection of domesticated rabbits slaughtered for human food, and for other purposes-----	Page 1
Report from U.S. Department of Agriculture-----	2

STATEMENTS

Fink, Pamela, American Rabbit Breeders Association of America-----	9
Mussman, Dr. Harry C., Associate Administrator, APHIS, U.S. Department of Agriculture-----	3

ADDITIONAL MATERIAL

Dubbell, Robert W., Pel-Freez Rabbit Meat, Inc., representing U.S. Domesticated Rabbit Industry, letter of February 17, 1977-----	15
Paley, Calvin, secretary-treasurer, United Farm Industries Inc., mailgram, February 19, 1977-----	14
"Mandatory Rabbit Meat Inspection," excerpt from Congressional Record, January 26, 1977, submitted by Hon. Keith Sebelius-----	24



MANDATORY INSPECTION OF RABBIT MEAT

TUESDAY, FEBRUARY 22, 1977

HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON LIVESTOCK AND GRAINS
OF THE COMMITTEE ON AGRICULTURE,
Washington, D.C.

The committee met at 2:15 p.m., pursuant to notice, in room 1302, Longworth House Office Building, Hon. W. R. Poage [chairman of the committee] presiding.

Present: Representatives Weaver, Harkin, Hightower, Bedell, English, Glickman, de la Garza, Jones of Tennessee, Akaka, Sebelius, Johnson, Hagedorn, and Coleman.

Staff present: Robert M. Bor, counsel; John E. Hogan, associate counsel; Glenda L. Temple, clerk; John C. Baize, and E. Lee Musil.

Mr. POAGE. The committee will please be in order. We will take H.R. 2521, by Mr. Sebelius.

[The bill H.R. 2521 and the report from the U.S. Department of Agriculture follows:]

[H.R. 2521, 95th Cong.; 1st sess.]

A BILL To provide for the mandatory inspection of domesticated rabbits slaughtered for human food, and for other purposes

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That, except as provided in section 2 of this Act, all the penalties, terms, and other provisions in the Poultry Products Inspection Act (71 Stat. 441; 21 U.S.C. 451-470) are hereby made applicable (1) to domesticated rabbits, the carcasses of such rabbits, and parts and products thereof, and to the establishments in which domesticated rabbits are slaughtered or in which the carcasses, or parts or products thereof, are processed, (2) to all persons who slaughter domesticated rabbits or prepare or handle the carcasses of such rabbits or parts or products thereof, and (3) to all other persons who perform any act relating to domesticated rabbits or other carcasses of such rabbits or parts or products thereof, and who would be subject to such provisions if such acts related to poultry or the carcasses of poultry, or parts or products thereof; and such provisions shall apply in the same manner and to the same extent as such provisions apply with respect to poultry and the carcasses of poultry, and parts and products thereof, and to persons who perform acts relating to poultry, the carcasses of poultry, or parts or products thereof.

SEC. 2. (a) The provisions in paragraph (a)(2) of section 15, section 2(a), and section 29 of the Poultry Products Inspection Act shall not apply with respect to domesticated rabbits or the carcasses of such rabbits, or parts or products thereof. The two-year period specified in paragraph (c)(1) of section 5 of such Act and the periods contemplated by paragraph (c) (4) of such section shall commence upon the date of enactment hereof, with respect to domesticated rabbits and the carcasses of such rabbits, and parts and products thereof; and in applying the volume provisions in paragraphs (c) (3) and (c) (4) of section 15 of such Act, the volume restrictions applicable to poultry shall apply to domesticated rabbits.

(b) For purposes of this Act—

(1)

(1) wherever the term "poultry" is used in the Poultry Products Inspection Act, such term shall be deemed to refer to domesticated rabbits;

(2) wherever the term "poultry product" is used in the Poultry Products Inspection Act, such term shall be deemed to refer to domesticated rabbit products; and

(3) the reference to "domesticated bird" in section 4(e) of the Poultry Products Inspection Act shall be deemed to refer to domesticated rabbit.

(4) the reference to "feathers" in section 9(a)(4) shall be deemed to be "pelt".

SEC. 3. This Act shall become effective upon enactment, except that no person shall be subject to the provisions of this Act prior to January 1, 1977, unless such person after enactment of this Act applies for and receives inspection for the processing for commerce (as defined in the Poultry Products Inspection Act) of domesticated rabbits or the carcasses of such rabbits, or parts or products thereof, in accordance with the provisions of this Act and pursuant to regulations promulgated by the Secretary of Agriculture under this Act. Any person who voluntarily applies for and receives such inspection after enactment hereof shall be subject, on and after the date he commences to receive such inspection, to all of the provisions (including penalties) of the Poultry Products Inspection Act as applied hereby in relation to domesticated rabbits, the carcasses of such rabbits, and parts and products thereof.

SEC. 4. The provisions hereof shall not in any way affect the application of the Poultry Products Inspection Act in relation to poultry, poultry carcasses, and parts and products thereof.

DEPARTMENT OF AGRICULTURE,
OFFICE OF THE SECRETARY,
Washington, D.C., March 24, 1977.

Hon. THOMAS S. FOLEY,
Chairman, Committee on Agriculture,
House of Representatives.

DEAR MR. CHAIRMAN: This is in reply to your request for a report in H.R. 2521, a bill "To provide for the mandatory inspection of domesticated rabbits slaughtered for human food, and for other purposes."

This Department does not recommend enactment of this bill.

Under the bill, the inspection of the slaughter of domesticated rabbits and the carcasses, meat, and products thereof, intended for use as human food would be made mandatory by extending the provisions of the Poultry Products Inspection Act (21 U.S.C. 451-470) to include such animals and articles. With few exceptions, the other provisions of the Act, including the exemptions and the prohibitions on distribution of adulterated or misbranded products, would also apply to persons engaged in the business of slaughtering domesticated rabbits or preparing, handling, or distributing the carcasses, meat, or products thereof.

The Department is currently providing rabbit inspection in four firms (a fifth firm recently suspended operations indefinitely). This inspection is voluntary and paid for by the firms under provisions of the Agriculture Marketing Act of 1946, as amended (7 U.S.C. 1621 *et seq.*). Production in 1976 was just under 2 million pounds of rabbit meat.

Based on year-old data supplied by the rabbit industry, at least 11 rabbit processors not now federally inspected and producing an estimated 2.2 million pounds of rabbit meat annually, would be required to be inspected under the provisions of H.R. 2521. The rabbit industry has also supplied data identifying some 29 smaller rabbit processors, producing an estimated 500 thousand pounds of rabbit meat annually, which would be exempt from the inspection provisions of the bill. The United States imported 876 thousand pounds of domesticated rabbit meat in 1976, all but a small fraction of it from the Peoples Republic of China.

The need for additional consumer protection against adulterated and/or misbranded domesticated rabbit meat produced in the United States has not been demonstrated. Of the rabbit processors not now federally inspected identified as requiring inspection under this bill, only three are not now known to be operating under a State inspection system.

The Food and Drug Administration of the Department of Health, Education, and Welfare now has responsibility for protecting consumers against adulterated and/or misbranded imported rabbit meat and therefore should be able to assess the need for additional protection

H.R. 2521 would require the inspection of just over 5 million pounds a year of domesticated rabbit meat at public expense. In view of the small proportion of the total population of the United States that consumes this type of meat, the cost of inspection should not be borne by all taxpayers. For a specialty food product, such as domesticated rabbit meat, a more equitable approach would be one where the inspection costs are borne only by those who consume the product, through inspection fees levied against the processors. The Agricultural Marketing Act of 1946, as amended, now provides authority for this Department to charge firms requesting inspection for these minor species of animals, and it is being used to provide inspection of buffalo, reindeer, squabs and domesticated pheasants, as well as rabbits. If inspection is made mandatory, it should be made on the same fee for service basis.

The Office of Management and Budget advises that there is no objection to the presentation of this report and that enactment of this legislation would not be consistent with the Administration's objectives.

Sincerely,

JOHN C. WHITE,
Deputy Secretary.

Mr. POAGE. Our first witness is Dr. Harry Mussman from the Department of Agriculture.

Please proceed, Dr. Mussman.

STATEMENT OF DR. HARRY C. MUSSMAN, ASSOCIATE ADMINISTRATOR, APHIS, U.S. DEPARTMENT OF AGRICULTURE; ACCOMPANIED BY ARNOLD GIESENMANN

Dr. MUSSMAN. Thank you, Mr. Chairman. With me at the table is Dr. Arnold Giesemann. It may be that he will have an opportunity to comment as we progress here.

As you noted I am representing the Department here on H.R. 2521. I wish to advise that the Department doesn't have a position at this time. It was somewhat late to develop one in the relatively short time that we have had since late last week. However, we are here in the event there are questions, and we would be happy to answer them at this time.

Mr. POAGE. Can you tell us what the position of the Department was a year ago?

Dr. MUSSMAN. At that time, Mr. Chairman, the position was to favor the general concept of rabbit inspection, but to recommend that the bill not be enacted for the reason that it was a highly specialized kind of food product that relatively few people consumed. In light of that it seemed inappropriate to have a general burden placed upon the taxpayers when the product was not one that was universally consumed by all consumers.

Mr. POAGE. Anybody have any questions?

Mr. JOHNSON. Maybe Mr. Sebelius knows all about it, but I don't know anything about it. I would like to have somebody explain. I would like to know what the act would apply to. It says, "All persons who perform any act relating to domesticated rabbits." How many people are you talking about? What is the need for it, and so on?

Dr. MUSSMAN. As this is written it will apply to all operations that exceed 20,000 rabbits being slaughtered annually.

Mr. JOHNSON. How many of those are there?

Dr. MUSSMAN. We estimate in the neighborhood of about 15 plants which would come under inspection. They would be slaughtering in excess of 20,000 rabbits a year, and there would probably be 30 or 35 others that would be exempt under the provisions of this act because they slaughter 20,000 rabbits or less per year.

As far as costs are concerned, we would have to give you a rough estimate because the numbers of plants that go in and out of operation vary from year to year. It is a fluid kind of business. In fact, one of the plants that was operating out of Kansas this past year has discontinued its operation.

Mr. SEBELIUS. It is ready to start up again.

Dr. MUSSMAN. I am glad to hear it.

As far as cost is concerned, I think our best estimate for startup cost in first-year operation of a program would run in the neighborhood of about \$50,000 with an annual operating cost of about \$175,000.

Mr. JOHNSON. Is there a need for this thing?

Dr. MUSSMAN. Well, in the past one of the things that we have continued to support, as I mentioned to the chairman, is this: We subscribe and support the general idea of inspection because it does give the consumer the assurance of freedom from any contamination, and guarantees a wholesome product.

Mr. JOHNSON. Are you talking about the inspection of the plant itself?

Dr. MUSSMAN. No, the meat product, the animals themselves. We support the general concept of inspection in principle. The reason we were opposed to the enactment of the rabbit bill was that the expenditure of general tax funds seemed to be disproportionately large compared to the service which would be afforded the U.S. consumers because so few of them are consuming rabbit meat due to the relatively low volume of product being produced. It did not add substantially to the level of protection that the consumer would be afforded in his average daily diet. Consumption of rabbit meat would be something like less than an ounce per person annually in the United States. This is not a significant dietary item.

As far as the need for inspection is concerned, we do have a voluntary program which has been available for some time and to which a number of the larger operators have subscribed. They voluntarily request the inspection. We put inspectors in the plant not only to verify the adequacy of sanitation, but to provide product free from disease, and so on. For this the plant operators reimburse the Government. They pay the full cost.

As far as we know, it has been working very well because it does afford rabbit processors the opportunity for an inspection program at their expense, and for that they are then able to place the USDA mark of inspection on their product. They can sell it as an inspected product.

Mr. JOHNSON. Do the States have public health facilities that inspect these kinds of plants that the Government does not? That is, the Federal Government?

Dr. MUSSMAN. The smaller operations in general would be those that would be exempt in this sort of an arrangement. Ordinarily they would fall under State or local requirements for sanitation and so on. It varies, however, from State to State as to the level of inspection or

requirements that are imposed on the operation. The State of California, perhaps, has one of the most comprehensive systems for inspection of this kind of product.

Mr. JOHNSON. Is there much interstate shipment of rabbit carcasses?

Dr. MUSSMAN. Yes, there is. In fact, the major processors of rabbit meat ship from coast to coast. They have certain areas in which the product is perhaps more attractive to the consumer, but in general there are not geographic limits to the extent to which it can be shipped.

It is only that which is USDA inspected on a voluntary basis which can be shipped interstate in this fashion with the Federal mark of inspection.

Mr. JOHNSON. So, anything which has not been approved by the voluntary inspection that you are talking about cannot be shipped—

Dr. MUSSMAN. It can be shipped with or without USDA inspection. All of it can cross State lines, but not with any kind of inspection insurance.

Mr. JOHNSON. Thank you. Mr. Chairman.

Mr. POAGE. I want to get this clear. I obviously don't know this. I thought that you charged a fee for these inspections.

Dr. MUSSMAN. Yes, we do, sir.

Mr. POAGE. Well, then, where does it involve the half a million cost to the Government?

Dr. MUSSMAN. If the inspection of rabbits were to be made mandatory, as this act would provide, they would then be amenable to the act as passed, not unlike poultry, and the costs of inspection would be picked up by the Federal Government. It would revert to the Government, and the user of that inspection service would no longer be liable for a charge.

Mr. POAGE. Do you mean then that the poultry inspections, that is, that no charge is made to the processor?

Dr. MUSSMAN. That is correct. Meat and poultry are inspected under the Poultry Products Inspection Act, and the Federal Meat Inspection Act, as amended. There is no charge to the packer or processor for the first 40 hours of inspection. For overtime, the packer or processor is required to reimburse the Government.

Mr. POAGE. That could mean a good deal or it could mean relatively little, couldn't it? If you don't send enough inspectors there would be a lot of charge, and if you don't send any there won't be any.

Dr. MUSSMAN. The number of inspectors is dependent on the workload in the particular plant in question. There are standards which have been developed by our meat and poultry inspection program which determine just how many people are needed to staff the inspection program.

Mr. SEBELIUS. It is my understanding that the Department does not favor the enactment of this, but strictly on the basis of money; is that correct?

Dr. MUSSMAN. That—and the fact that it is a specialty product with very limited usage by the consuming public.

Mr. SEBELIUS. The Department, I suppose has looked into the problem of imported Chinese rabbit meat or Polish rabbit meat; hasn't it?

Dr. MUSSMAN. We have not because that product is not amenable to any of the acts which we administer at the present time. The imported rabbit meat comes under the responsibility of the Food and Drug Administration.

Mr. SEBELIUS. I am aware of that. I have here some pictures of Chinese imported rabbits, along with those from Pel-Freez (indicating). It shows the kind of meat they have. Poultry, itself, wasn't used to a great extent in the stores until after the mandatory inspection. Then poultry got a stamp, and people felt that what they would buy, other than knowing who raised the chicken and who dressed it. Then it took off. I am a little surprised about this Department being bent toward consumerism, and then we have rabbit meat which is the lowest in fat, and the lowest in cholesterol, and the highest in protein. I am also wondering if the Department has taken into consideration that it is an item that the poor can raise. The minorities can raise and use them.

Of course, I raised rabbits as a boy. I think that had I been able to put a stamp on there that these were clean rabbits, then you could have sold more than you could now. I think maybe the Department is being penny-wise and dollar-foolish by saying that it is a specialty product. I can go into supermarkets out here and buy Pel-Freez rabbits. I could buy Hillcrest until they closed down. I think it is something that should be offered to the consumer with USDA stamp on if he want it.

As you know we hooked it into the Poultry Act. This time we equated it with the bird. We applied the word "poultry" as opposed to "turkey." We are talking at the present time of maybe 12 plants which would require this inspection. I am a bit surprised that the Department does not want to carry this much further.

Let me show you the pictures of imported Chinese rabbits. It is spoiling the market because there is just simply an occasional check of rabbits. I would think the department would want the American consumer to have this opportunity. I think this would be given consideration.

Dr. MUSSMAN. That could very well be the case.

Rabbits have never been identified in either of the poultry or meat inspection acts which we administer as being livestock. So they have simply not been required to be inspected.

Until the recent bills which have been introduced to include rabbits, there was no indication that there was an intent or desire to do so.

Mr. SEBELIUS. As a matter of fact, quite a few rabbits are processed in poultry plants at the present time.

Dr. MUSSMAN. It could very well be. I don't know what the numbers would be.

One thing, Mr. Congressman, that I should mention here is this. With the kind of provisions for exemptions that are built into this bill that are comparable to what they are now in the Poultry Products Inspection Act, it is estimated that perhaps only 75 percent of all rabbits which would get into consumer channels would be subjected to a mandatory inspection by the Department of Agriculture.

You might contrast that with the fact that in the poultry area—we are talking primarily of the broiler industry—by applying the same provisions and the same exemptions we are probably inspecting over 99 percent of all the product moving in consumer channels.

The only thing that is exempted in those cases would be that which is slaughtered strictly on a custom basis for the owner, for his own use, or for that of his friends or immediate family. There are very few poultry processors, other than the custom exempt operations, processing, and selling 20,000 chickens or less. This exemption would have more impact when applied to rabbits because there are a lot of producers who are processing and selling 20,000 or less rabbits a year.

Mr. POAGE. You told us that some of the growers and some of the processors were now having inspection and paying for it.

Dr. MUSSMAN. That is right.

Mr. POAGE. What percentage of the rabbits are now inspected?

Dr. MUSSMAN. We would estimate today, Mr. Chairman, in the neighborhood of 20 or 25 percent of the product moving in consumer channels would be inspected on a voluntary program.

Mr. POAGE. You would about triple the amount?

Dr. MUSSMAN. Conceivably.

I would like to reserve the right to modify that number if we can verify it. I just tried to give an answer that meant something.

Mr. POAGE. Certainly.

Mr. JOHNSON. There does not seem to be any problem does there, with selling the product now without the USDA stamp on it?

Dr. MUSSMAN. It is hard to say. We are not too involved in the marketing aspects. I am not that knowledgeable about it, but apparently all that is being produced is being sold. I presume that the USDA inspection mark is sufficiently desirable to warrant voluntary inspection being undertaken by those plants which have asked for it.

Mr. JOHNSON. Yes, I understand that you think it is a good guess, but you estimate around one-fourth of the rabbits—

Dr. MUSSMAN. But they are the major producers, the ones who want to ship to a variety of markets. The balance are relatively small operators who deal with local markets, and the inspection mark doesn't have that significance there that it would in the major markets.

Mr. JOHNSON. What would be the necessity then of inspecting another 50 percent?

Dr. MUSSMAN. I'm not sure.

Mr. JOHNSON. I'm searching for someone to sell me on it. I am not opposed to it but I have heard no reasons why we should vote for it.

Dr. MUSSMAN. I'm not sure I can give you a persuasive argument for increasing the scope of inspection. In fact, the voluntary program is available to anyone who wishes to become involved in it.

Mr. JOHNSON. Is there any health problem that we are incurring without having more inspection?

Dr. MUSSMAN. We are unaware of any.

Mr. BEDELL. It is my understanding, from the meatpacking plants that I have in my district, that they are charged back and pay the department back for the cost of meat inspection in our beef processing plants. Is that correct?

Dr. MUSSMAN. It would only be for the overtime, not for the 40 hours of inspection to which they are entitled each week they are in operation.

Mr. BEDELL. So Iowa beef or wherever it may be is having that inspection paid for by the Government; is that correct?

Dr. MUSSMAN. That is correct.

Mr. POAGE. If there is no one else who has questions, we are very much obliged to you.

Mr. SEBELIUS. I have one thing further, Mr. Chairman.

Rabbits are subjected basically to the same kinds of diseases as other animals aren't they?

Dr. MUSSMAN. They have diseases. They have infectious diseases and parasitic diseases.

Mr. SEBELIUS. They have diseases and they can communicate the diseases just as other animals; can't they?

Dr. MUSSMAN. Yes, a relatively limited number.

Mr. SEBELIUS. The same as chickens?

Dr. MUSSMAN. Offhand I would hate to equate them.

Mr. SEBELIUS. Cattle?

Dr. MUSSMAN. There are some diseases of rabbits that come to mind, but none of them poses any serious problem as far as dealing with the carcass as the consumer gets it. Tuleremia, for example, is one that usually is contracted by skinning out rabbits—

Mr. SEBELIUS. Are you familiar with the amount of chicken that became consumed within a year after USDA inspection of poultry was put in place as regards the amount that was consumed per capita before and after. Quite a dramatic rise; wasn't there?

Dr. MUSSMAN. Yes.

Mr. SEBELIUS. It speaks well of USDA and their work.

Dr. MUSSMAN. Yes.

Mr. SEBELIUS. I am trying to do for rabbits what they did for chicken.

Mr. GLICKMAN. Are there other animals that are edible by humans that are sold commercially that are not required to be inspected, besides rabbits? And what are they?

Dr. MUSSMAN. We have some importations of wild rabbits from Australia which are sold commercially. There are some importations of certain other specialty products such as reindeer meat and things of that nature which come in under the Food and Drug Administration's provisions rather than USDA's.

Mr. GLICKMAN. When they come in through customs and FDA has supervision, do they do a similar type of inspection that the USDA does?

Dr. MUSSMAN. No; it is significantly different. We monitor the entry of every lot of meat products coming in which is under our jurisdiction. This is in addition to having a foreign program in place to see that inspection is being carried out according to our requirements in the country of origin. FDA monitors in an intermittent sense. They check occasional shipments and have a sampling program which gives them a reasonable idea of what kind of product is coming in.

Mr. GLICKMAN. It is really not inspection. It is kind of cross-check; is that right?

Dr. MUSSMAN. Much like they would apply to any other product.

Mr. GLICKMAN. If you were bringing contraband in, it would be the same thing?

Dr. MUSSMAN. Yes, sir, their law provides for that, whereas the USDA laws are somewhat different.

Mr. GLICKMAN. Do you have any idea—maybe Mr. Sebelius does—do you have any idea of the number of people who eat rabbit meat, either as a staple or occasionally?

Mr. SEBELIUS. As far as figures go, we will have a young lady testify on that subject next. I have letters to put in the record that touch on that. It is estimated that about 5 million people do.

Dr. MUSSMAN. We have seen a figure that is close to that. We have also seen up to 20 million suggested by some people.

Mr. GLICKMAN. As a personal matter, I thoroughly support this bill. Anything that is subject to that much consumption should be subject to some kind of inspection program.

Mr. BEDELL. If I am going to market within the United States, let's say buffalo meat, or horse meat, or guinea hens, or pheasants, or some of these other things which are meat products which are sold in small quantities, is it required that they be inspected or is it the same as the rabbits that I can go ahead and sell interstate without having them inspected?

Dr. MUSSMAN. With the exception of pheasants, which you mentioned, I believe all the rest are subject to USDA inspection. Horse meat and guinea hens are subject to inspection.

Mr. BEDELL. What is the logic that we would require buffalo meat to be inspected and not require rabbit meat to be inspected? Is there some logic there?

Dr. MUSSMAN. Buffalo meat is not inspected. I should have mentioned that as one that is exempt from the USDA inspection.

Mr. BEDELL. If I raised buffalo and wanted to ship meat anywhere, I could ship it anywhere in the United States and not have it inspected? It is the same as rabbits?

Dr. MUSSMAN. Yes.

The only provisions that would govern the marketing of buffalo, or the other ones that are not amenable to our acts, would be whatever requirements the Food and Drug Administration imposed.

Mr. BEDELL. I could ship it to Safeway and they could sell it in a store here in Washington, D.C.? They just wouldn't put the stamp on it?

Dr. MUSSMAN. That is correct.

Mr. BEDELL. They could still sell it?

Dr. MUSSMAN. That is correct.

Mr. POAGE. Thank you very much, Dr. Mussman.

Dr. MUSSMAN. Thank you.

Mr. POAGE. Miss Fink, we would be delighted to hear from you.

STATEMENT OF PAMELA FINK, AMERICAN RABBIT BREEDERS ASSOCIATION OF AMERICA; ACCOMPANIED BY JERRY FINK, ATTORNEY

Ms. FINK. My name is Pamela Fink, and I am here today to make a statement in support of H.R. 2521 on behalf of the American Rabbit Breeders Association of which I am a member. The association has authorized me to speak in its behalf and I appreciate the opportunity to speak before this committee.

I raise purebred rabbits and sell them to improve the breeding stock of other breeders. I am a member of the National Capitol Rabbit Breeders Association, the Southern Maryland Rabbit Breeders Association and the Richmond Rabbit Breeders Association. Last year I was on the board of directors and chairman of the program

committee of the Southern Maryland Rabbit Breeders Association. This year I am on the board of directors of the Silver Marten Rabbit Club which is the national organization for the Silver Marten Breed and chartered by the American Rabbit Breeders Association, and assistant show secretary for the Richmond Rabbit Breeders Association.

I have been raising and breeding rabbits since 1974 and have attended rabbit shows as an exhibitor in Pennsylvania, Virginia, Maryland, and North Carolina, as well as the 53d American Rabbit Breeders National Show and Convention at York, Pa. in 1976 of which I was breed chairman and secretary for the Silver Martens.

To illustrate the interest of people in the rabbit industry at this show and convention, there were over 6,300 rabbits representing 38 different breeds exhibited by some 700 representatives from 41 States and Canada.

Today my purpose is to highlight for the committee the reasons for and to support passage of this legislation which you are considering. I understand that an identical bill has been introduced in the Senate for their consideration. My statement will apply equally to that proposal.

Last year both the House and Senate passed legislation designed to protect both the consumers and the rabbit meat industry. This legislation was vetoed by the President as not being cost effective on the part of the taxpayers who ultimately bear the burden for all implementation of legislation passed by Congress. I disagree with this position because the cost is minimal compared with the benefits to be derived.

It was estimated by the U.S. Department of Agriculture that the cost to provide meat inspection for both domestic and imported rabbit meat would be less than \$200,000 per year through 1976, according to Under Secretary Campbell in his testimony before the Senate on February 25, 1972.

These figures were further supported by Deputy Administrator Carson of the Animal Plant Health Inspection Service in testimony before the Senate on February 9, 1977. On August 20, 1975, Mr. Campbell again testified before the Senate Agriculture Committee that the cost would be \$400,000 annually for the next 5 years, through 1981.

This testimony is in sharp contrast to that of Mr. Dubbell of Pell Freeze Rabbit Meat, Inc., who has estimated that of the 44 rabbit meat processing plants, 29 would be exempted from the inspection requirement because they process less than 20,000 rabbits annually. His estimate of the cost at current rates is \$200,000 annually.

I support the lower cost figures, but in any event the cost effectiveness of this bill will be equal to or greater than that of meats presently being inspected under existing legislation.

The need for this legislation has been well-documented in connection with last year's legislation. I urge each member of the committee to review this prior legislative history and material previously submitted. I urge you to incorporate this material in your report on this bill.

The situation has not changed. The fact is that foreign imports of rabbit meat practically destroyed the domestic rabbit meat industry in England. These imports were primarily from the People's Republic of China. This same situation will prevail in the United States if foreign rabbit meat processors are allowed to continue their uninspected rabbit meat import program from a country where prices and labor are artificially subsidized and standards are minimal or nonexistent.

All that is sought by the American rabbit meat industry as a protective measure is adequate inspection of imported rabbit meat.

I believe the presently proposed bill will achieve this purpose. It will put rabbit meat on a par with chicken and other meats including horse, mule, goat, geese, and guineas. More important, it will preclude competition of importated products with domestic products except on an equal basis.

The cost to achieve this goal on the context of overall expenditures compared to other industry protection is highly cost effective.

The final point that I would like to make and the one that is most important is the protection afforded to the consumer. This protection will assure both wholesomeness and preclude adulteration. Imported rabbit meat from the People's Republic of China is a totally unknown quantity. It is the only meat product permitted from China and the USDA has no knowledge of their meat production, regulations, specifications, medication, or quality of the product. Imported rabbit meat sold domestically is not required to be labeled as an imported product and there is evidence that it is sometimes sold to a misinformed public as a U.S. Department of Agriculture inspected meat product. This proposed legislation would preclude these practices.

The Food and Drug Administration is not the proper agency to administer meat inspection. This has traditionally been the responsibility of the U.S. Department of Agriculture. There are some 6 to 20 million people eating rabbit meat in the United States. They eat approximately $\frac{3}{4}$ to $2\frac{1}{2}$ pounds of rabbit meat annually. These people need the assurance that the rabbit meat they eat is wholesome and unadulterated.

This bill, H.R. 2521, will provide such assurance with respect to foreign imported rabbit meat. With this assurance the rabbit meat industry both domestic and foreign, can expect consumption to increase which will benefit the industry as a whole. Pound for pound, rabbit meat yields a higher ratio of protein for growth food used than beef or other animals.

In the future, this will be an important consideration as world population requires greater and greater food consumption. This legislation will strengthen the industry against this future problem. I believe my generation has an important stake in this problem because it will become a reality in my lifetime.

The facts and statistics in support of my statement have been previously submitted for legislation before the 94th Congress and will be resubmitted and updated for the proposed legislation now before the 95th Congress.

Therefore, I would like to sum up my reasons for supporting this legislation.

First: Although questioned in the past, I believe, contrary to the last administration, that the legislation is cost effective and should be supported by both Congress and the present administration.

Second: As part of the cost effectiveness, it should be supported so that the domestic rabbit meat industry is not put in an unfair noncompetitive position as opposed to the foreign rabbit meat importers.

Third: I believe this legislation is important because it will render assurance to the consumers that the meat they eat is wholesome and unadulterated, giving increased impetus to the rabbit meat industry which is an important asset as a future source of food.

I want to thank you for the opportunity to appear before this committee in support of this proposed legislation.

Mr. POAGE. Thank you very much, Ms. Fink.

Mr. SEBELIUS. I have one question. I also want to thank Ms. Fink for this. As a 17-year-old she has become quite an authority.

You mentioned the importation of Chinese rabbits.

Do you share the feeling of many of the businesses that the importation of the Red Chinese rabbit is one that would do grave damage to the domestic rabbit industry in the United States at the present time?

Ms. FINK. Yes, sir, I do. Last year there was a total of 1.7 million pounds of rabbit meat imported from Poland and Red China, and out of that, 1.5 million alone was imported from Red China.

Mr. SEBELIUS. It's not a matter of competition. What is the other thing that worries you because of what it is doing to the rabbit industry in the United States?

Ms. FINK. Basically our main problem is the consideration for the consumer because if the consumer does not know what he is buying, then our rabbit industry is going to be liquidated if anything should happen to any of these consumers when they buy this rabbit meat. If they should get sick after they buy the foreign imported meat they will condemn the whole industry. That will liquidate us. In the future when we have a need, because of the growth of the population, for the high protein and the pound-for-pound ratio which it yields, we will not have it. Our industry will be no more.

Mr. SEBELIUS. Thank you. Thank you, Mr. Chairman.

Mr. WEAVER. Ms. Fink, I have a number of people in my district who keep 10 or 20 rabbits in the backyard. It is for their own table and they sell them to friends. How would this bill affect them?

Ms. FINK. As to the selling to their friends, the bill would not put any pressure on them to be inspected. However, in the long run if this bill is not passed, you see, the people who breed rabbits for showing or for the improvement of stock of other people will not be able to sell their rabbits because if they cannot sell to the people who are having the rabbit meat inspected and bought, then they have no market themselves. Effectively, it will put them out of business.

Mr. WEAVER. How would it actually change the way that these people, with just a few rabbits, do; will they have to get them inspected?

Ms. FINK. No; it won't hurt them at all. They wouldn't have to get them inspected. It would only increase their sales by virtue of the fact that the meat will be inspected elsewhere.

Mr. WEAVER. Thank you, Mr. Chairman.

Mr. BEDELL. We have one of our legislators from Iowa, Keith Baker, here, Mr. Chairman. I would like to have him recognized.

Mr. POAGE. Certainly, We're glad to have you.

Mr. GLICKMAN. In my mind the chief reason for inspection has to be for health purposes. Do you have any reason to believe that the rabbits which are being imported are of deficient quality in terms of the deleterious effect on consumption?

Ms. FINK. Yes, sir, I do. As a matter of fact, in case you all do not know, the Canadian Government has banned the imports of rabbit meat from Red China because it is believed to carry foot-and-mouth disease, and also myxamatososis, which is a disease that rabbits can

get and it can be stored for long periods of time in the cold which would apply to frozen rabbit meat. This has been proven by qualified experts. I believe those experts from Pel-Freez have proven that certain shipments of rabbits coming into the United States do contain some of these diseases.

Mr. GLICKMAN. Thank you.

Mr. POAGE. Let me get this straight. Did I understand you to say that rabbits have foot-and-mouth disease?

Ms. FINK. Yes.

Mr. POAGE. Any other questions?

If not, we are very much obliged to you, Ms. Fink.

Mr. SEBELIUS. Mr. Chairman, I have a mailgram here from Calvin Paley of Denver, Colo. who is secretary-treasurer of the United Farm Industries. It has been passed out to the members. We have the letter that Mr. Dubbell mailed to the chairman and everybody has a copy of that which I would like included in the record.

Mr. POAGE. Without objection those will be inserted in the record.

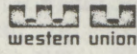
Mr. SEBELIUS. This is like imported poultry and imported cattle, and the USDA spot checks. What I am worried about is what the rabbits from Red China are doing to the industry. You don't know what you get when you buy one in the store because they are not regulated and graded. That is my feeling.

I'm not trying to compete with the cattlemen. Three does can raise as much meat as a cow-calf in 1 year. [Laughter.]

Mr. POAGE. If there are no further questions, we will close the hearing.

[The material referred to above follows:]

MAILGRAM SERVICE CENTER
MIDDLETOWN, VA, 22645

 **Mailgram**
western union



24

2-045153E050 02/19/77 ICS IPMBNGZ CSP WSHB
3033643756 MGM TDBN DENVER CO 251 02-19 0400P CST FFB 21 REC'D

CONGRESSMAN KEITH SEBELIUS
1211 LONGWORTH HOUSE OFFICE BLDG

WASHINGTON DC 20515

DEAR CONGRESSMAN SEBELIUS,

THOSE OF US IN THE RABBIT INDUSTRY GRATEFULLY APPRECIATE THE CONTINUING
SUPPORT TO PASS LEGISLATION FOR COMPULSORY INSPECTION, OUR SINCERE
THANKS TO YOU AND SENATOR DOLE

UNITED FARMS INDUSTRY INC RECENTLY PURCHASED A RABBIT PROCESSING PLANT
IN HILL CITY KANSAS. THIS PLANT HAS THE ULTIMATE CAPACITY OF
SLAUGHTERING TEN THOUSAND RABBITS DAILY. ADJOINING THE PROCESSING ARE
THE ULTIMATE CONTROLLED BUILDINGS THAT WILL HOUSE TEN THOUSAND WORKING
DOES AND REPRESENT THE LARGEST RABBITTRY IN NORTH AMERICA. THIS
FACILITY ONCE OPERATIONAL, WILL PRODUCE TWO MILLION FOUR HUNDRED
THOUSAND POUNDS OF MEAT ANNUALLY.

PASSAGE OF THIS LEGISLATION WILL GIVE A TREMENDOUS BOOST TO THE ECONOMY
OF GRAHAM COUNTY KANSAS AND PARTICULARLY TO THE DEPRESSED PEOPLE OF
HILL CITY KANSAS. THE FACILITY IN FULL OPERATION WILL EMPLOY 85 PEOPLE.
IN TRUTH IT WILL HELP BREEDERS WITHIN A FIVE HUNDRED MILE RADIUS OF
HILL CITY KANSAS. THESE PEOPLE MOST ASSURIDLY NEED A PROCESSING PLANT
AT THEIR DISPOSAL.

CONGRESSIONAL UNDERSTANDING OF THE RABBIT INDUSTRY IS CRITICAL IN
THESE TIMES. THE NEED FOR HIGH PROTEIN FOOD AT LOW COST IS APT TO
BECOME VERY ESSENTIAL IN OUR SOCIETY, AS IT ALREADY IS IN UNDER
DEVELOPED NATIONS THROUGHOUT THE WORLD. GROWTH OF THIS INDUSTRY IS
RELATED TO THE UNDERSTANDING AND COOPERATION BY THE LEADERS IN CONGRESS
RESPONSIBLE FOR THE DEVELOPMENT OF INDUSTRIES BENEFICIAL TO OUR NEEDS.

ONCE AGAIN I WANT TO THANK YOU CONGRESSMAN SEBELIUS, SENATOR DOLE AND
THE RESPECTED MEMBERS OF THE AGRICULTURAL COMMITTEE FOR ALL THE
CONSIDERATION AND EFFORTS YOU HAVE EXTENDED.

UNITED FARM INDUSTRIES INC
3643 EAST 1ST AVE DENVER CO 80206
MR CALVIN PALEY, SECRETARY TREASURER
1210 E 1ST

Pol-Freez

RABBIT MEAT, INC.

P.O. BOX 66
ROGERS, ARKANSAS 72756
PHONE (501) 638-4361

February 17, 1977

The Hon. W. R. Poage, Chairman
Subcommittee on Livestock and Grains
Committee on Agriculture
Room 1301, Longworth House Office Building
Washington, DC 20515

Dear Mr. Poage: RE: H.R. 2521, MANDATORY RABBIT MEAT INSPECTION

As a spokesman for the rabbit industry in the United States, our industry greatly appreciates the fact that HR 2521 has been introduced so early in the 95th Congress. We ask your Subcommittee approval as quickly as possible.

I have had the privilege of testifying before your Committee twice. The testimony presented herewith basically will be the same as I gave in person on Sept. 11, 1975, except to emphasize that the need for Mandatory Rabbit Meat Inspection is greater today. Also, I am presenting information developed since 1975, and this appears in a FACTS report attached. This FACTS report was prepared for the Senate Agriculture Committee in 1976 when they considered and passed H.R. 10073.

H.R. 2521 is changed in one area only from the H.R. 1502, which your Subcommittee approved on Sept. 11, 1975, and from H.R. 10073, which the Full Committee on Agriculture approved in October 1975. This change now classifies rabbits as "other poultry" under the Poultry Products Inspection Act. This change is correct as rabbits will now receive fair and equal treatment with chickens and other poultry.

As of this time, we believe that there will be 15 to 17 plants that will process in excess of 20,000 rabbits a year. Some of these plants will operate part-time, 1 to 3 days a week, thus reducing inspection costs. Attached herewith is a list of these plants by name and location.

Basic areas of consumer protection resulting from Mandatory Rabbit Meat Inspection will be:

1. Assurance that the majority of all U.S. produced rabbit meat will be inspected for wholesomeness by the USDA or States.
2. Assurance that rabbit meat will be properly labeled.
3. Assurance that inspected rabbits will not be adulterated by the addition of excess amounts of water during processing.
4. Assurance that this rabbit meat will not contain unauthorized levels of medications or growth enhancers.
5. Assurance that imported domesticated rabbit meat is inspected under methods approved by the USDA.
6. Assurance that imported rabbit meat shows country of origin by proper labeling. This is not being done at present.



featuring "The Seals that Sell," including Good Housekeeping.



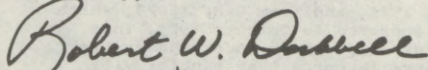
I am asking The Hon. Keith G. Sebelius to hand to your committee a brochure showing the great need for USDA inspection control on imported rabbit meat. The FDA cannot do the job that is required as they just do not have the personnel. Also, it is impossible for any agency to properly inspect frozen carcass meat, or cut-up meat, when it is offered for inspection at the Ports of Entry.

The folder was prepared as a result of our company being offered 720,000 pounds of Chinese rabbit meat on October 1, 1976. We asked to see a sample of the rabbits, and the results of our inspection of this imported meat ~~are~~ pictorially presented. It is too bad that the pictures of the imported meat do not also carry the very bad odor of the meat. Also, the pictures cannot present the change in color of the normal rabbit fat from white to a greenish-yellow that is the result of rancidity. Such odors and bad taste cause consumers to reject rabbit meat as a desirable product. The packers of U.S. rabbits suffer from this loss of consumer acceptance, and consumers are now buying rabbits without knowing they come from China or other countries.

HR 2521 will correct these problems when the bill becomes enacted and signed into law. Hopefully, President Carter will not be misled as was President Ford, and Mandatory Rabbit Meat Inspection will finally be achieved to the benefit of all rabbit consumers, the tens of thousands of rabbit farmers, and the rabbit processors.

Our industry again asks for your Subcommittee approval.

Respectfully,



Robert W. Dubbell
Spokesman for the U.S.
Domesticated Rabbit Industry

enclosure

RABBIT MEAT PROCESSORS HANDLING OVER 20,000 RABBITS IN 1976

ARKANSAS

Pot-Freezes Rabbit Meat, Inc., Box 68, Rogers, AR 72756

CALIFORNIA

El Monte Rabbit Co., 1641 S. Cogswell, So. El Monte, CA 91733
 The Gems Rabbitry, Arroyo Grande, CA 93420
 Independent Rabbit Company, 3583 Christensen Lane, Castro Valley, CA 95646
 Lucky Rabbit Company, 2724 Durfee Ave., El Monte, CA 91732
 Morco Rabbitry, 3781 Corona Ave, Norco, CA 91760
 Valley Farms Rabbits, Inc., P.O. Box 2023, 306 Front St., El Cajon, CA 92020
 Valley Rabbitry, Mr. Tom Watkins and Mr. David Gomez, Stevinson, CA 95374

MAINE

Cottontails, Inc., Mr. John Shawley, RR 1, Box 166M, Stetson, ME 04488

MISSISSIPPI

Happy Chick Farm Rabbitry, Howard L. Mays, Rt. 10, Box 235, Gulfport, MS 39501

NORTH CAROLINA

The Arrows Rabbit Farm, Rt. 4, Box 194, Statesville, NC 28677
 Carolina Game Farm, Inc., Lawndale, NC 28090

OHIO

Agri-Industries Internationale, Inc., Mr. Bill Mason, Office: 6400 E. Broad, Columbus, OH 43213
 Plants: Waverly, OH. Opened late in 1976
 killing at rate of 20,000/year

OREGON

Hills Rabbitry, 92439 Alvadore Road, Junction City, OR 97448
 Grand Ronde Rabbitry, Star Rt. 2, Box 5, Grand Ronde, OR 97347

SOUTH CAROLINA

Palmetto Rabbit Co-op, Inc., Rt. 1, Box 373, Warrensville, SC 29851

TEXAS

Rabbit Industries, Inc., Box 796, Anton, TX 79313

WASHINGTON

Totem Farms, Gregg Shannon, 13640 132nd Ave. NE, Kirkland, WA 98033

NOTE: There are many small processors who will process less than 400 rabbits a week. We estimate there are about 25 such processors in operation, and not over 30, based on information received from the known processors in all parts of the U.S. The total production of these plants will be less than the largest plant listed above, and such rabbits are usually sold direct to the consumer, or entirely within a local market area.

NOTE: The rabbit industry asks that this testimony to the 1976 Senate Agriculture Committee become part of our testimony on Feb. 22, 1977, Hearing before The Subcommittee on Livestock & Grains on HR 2521

F A C T S
on S. 16
MANDATORY RABBIT MEAT INSPECTION

21

Presented by The Domesticated Rabbit Industry
Vs.
Statements by the USDA to Congress

A. COST OF MANDATORY RABBIT INSPECTION

Under Secretary, USDA, J. Phil Campbell
before the Senate, Feb. 25, 1972

1973	\$154,000
1974	162,000
1975	170,000
1976	178,000

Note: 60 processing plants in
operation

Deputy Administrator, USDA, APHIS
John E. Carson to Senate Agriculture
Committee, Feb. 9, 1973

1973	\$ None
1974	180,000**
1975	163,500
1976	172,000
1977	180,000
1978	189,000

** Includes \$17,000 non-recurring
costs 1st year.

Note: 55 processing plants in
operation

Under Secretary, USDA, J. Phil Campbell
to the Senate Agriculture Committee
Aug. 20, 1975

\$400,000*
Annual cost 5 yrs.
*22% higher
than avg. costs
for 1976, 1977
and 1978 above.

Note: 44 processing plants in
operation, 29 should be
exempt if rabbits receive
same exemptions as chickens.

RABBIT INDUSTRY, R. W. Dubbell, Jan. 1976
to the Senate Agriculture Committee
and to the USDA, APHIS.
Based on a total of 44 processing
plants, 29 of which would be exempt
if rabbits receive fair and equal
exemptions same as for chickens.

\$175,000 to
200,000
Annual cost at
current rate.

USDA says this tax burden should not be placed upon the public
since so few consumers eat rabbit, about 1 oz. per capita
per year based on total U.S. population.

RABBIT INDUSTRY believes that an annual cost of 1/4¢ to 1/3¢
per taxpayer is not a burden. Even using the cost figure
quoted by the Under Secretary, this would be only 3/5¢
per taxpayer, based on 70 million taxpayers.

RABBIT INDUSTRY surveys nationwide show that 3% to 10% of the
total U.S. population eat rabbit meat. This is 6 to 20
million consumers, with annual consumption of at least
11 oz. per person up to 2.3 lbs. per person each year.

E. VOLUME OF RABBIT MEAT CONSUMED IN THE U.S. PER YEAR vs. OTHER MEATS.

USDA, J. Phil Campbell, Aug. 20, 1975, in his letter to Senate Agriculture Committee, reports a total estimated U.S. consumption of domesticated rabbit meat at 13,900,000 pounds, equal to 1 oz. per capita per year.

RABBIT INDUSTRY reports that this 13,900,000 pounds of rabbit meat equals approximately 6,800,000 head of live rabbits.

USDA states that due to an average of only 1 oz. of rabbit meat being consumed each year, that Mandatory Rabbit Inspection is not justified.

RABBIT INDUSTRY says that it is not the average consumption of rabbit meat by the entire U.S. population that matters. It is the amount of rabbit meat consumed by the public who eat rabbit, and this is not the 1 oz. reported by the USDA, but would range between 11 oz. and 2.3 lbs. per year.

RABBIT INDUSTRY reports that the 13,900,000 lbs. of rabbit meat is sold to more consumers, in more States, and in many more retail stores than several other meats that are presently processed under Mandatory Meat & Poultry Inspection. In 1975, USDA figures report the following number of live animals or birds presented for ante-mortem inspection:

HORSE MEAT AND MULE MEAT	231,119 head
GOAT MEAT	50,684 head
GEESSE AND GUINEAS	1,136,000 head

RABBIT MEAT represents approx. 6,800,000 head based on Under Secretary Campbell's figures, this including rabbits that are uninspected, State inspected, Voluntary USDA inspected, plus imported rabbits.

WHY DOES THE USDA OPPOSE MANDATORY RABBIT MEAT INSPECTION?

The need for Mandatory Rabbit Meat Inspection is much greater in 1976 than it was in 1972 and 1973 when the USDA did not oppose this desirable consumer protection legislation.

C. IMPORTED DOMESTICATED RABBIT MEAT VOLUME 1975 vs. 1971.

IMPORTS FROM POLAND IN 1971	80,298 pounds
IMPORTS FROM CHINA IN 1971	None

IMPORTS FROM POLAND AND CHINA IN 1975	1,500,000 pounds per USDA, Under Secretary Campbell.
---------------------------------------	--

This is an increase of 1,868% in 4 years.

RABBIT INDUSTRY reports that 13 other countries have offered domesticated rabbit meat to the U.S.

USDA opposes Mandatory Rabbit Inspection instead of supporting this vitally needed legislation that would require high quality inspection at time of processing, such inspection being equal to USDA specifications and regulations.

D. QUALITY OF IMPORTED RABBIT MEAT AND TYPE OF INSPECTION NOW PROVIDED.

POLISH rabbits apparently are properly inspected.

CHINESE rabbits are an unknown product. China does not permit U.S. inspectors to roam their country. Production methods are reported to be crude and unsanitary when compared with rabbits produced in the U.S. The quality of feed, as reported by one of the shippers of Chinese rabbits, and by Japanese who have visited China, is basically vegetable scraps which U.S. rabbit producers would call garbage.

USDA, Dr. Harry C. Mussman, Associate Administrator, APHIS, testified as follows on Sept. 11, 1975 before the House Subcommittee on Livestock and Grains in a Hearing on HR 1502, Mandatory Rabbit Inspection:

HON. KEITH G. SEBELIUS: What meat products from the Peoples Republic of China are now in the United States other than rabbit meat?

DR. MUSSMAN: None at all, sir.

MR. SEBELIUS: Are the inspection programs, regulations, and specifications of Chinese meat products considered to be acceptable in conformity with USDA regulations and specifications?

DR. MUSSMAN: I cannot really answer that because we have no regulations governing it at this time.

MR. SEBELIUS: You don't know what they do to their rabbits?

DR. MUSSMAN: No, sir, I don't.

FDA, Dr. Howard R. Roberts, Acting Director, Bureau of Foods, October 17, 1975 letter to R. W. Dubbell advised: "As we explained in our August 18, 1975 letter, we do not have sufficient resources to examine every shipment of every imported food, just as we do not have the resources to examine every shipment of every food in domestic commerce. We do, however, try to concentrate attention upon those foods most likely to be violative, whether imported or domestic. It is not possible for us to agree to single out one food, such as imported rabbit meat, for 100% coverage solely on the basis of its identity. We are, however, giving attention to imported rabbits, and both we and the Bureau of Customs have reiterated to our field offices the necessity of giving appropriate attention to imported rabbit meat."

RABBIT INDUSTRY believes that every rabbit imported should be fully inspected for wholesomeness by qualified veterinary inspection, just as the USDA requires U.S. rabbit meat processors to do under the Voluntary inspection program. This should be of even greater importance for rabbit meat coming from China where the USDA has no knowledge of their methods, products, regulations, specifications, diseases of rabbits in China, medications, and quality of food.

(Section D is continued on page 4)

RABBIT INDUSTRY believes that the FDA cannot, and has not been able to, properly inspect imported rabbit meat in the past. FDA does its best, but it cannot possibly provide complete inspection of the meat. Proper inspection can only be done at the time the rabbits were slaughtered and processed. It is not possible to inspect every frozen rabbit carcass, or package of frozen imported rabbit meat. For example, FDA passed Chinese rabbits at time of entry into the U.S., the rabbits appeared in frozen meat counters of at least 3 large retailers in Chicago, yet another major chain took the time and trouble to inspect the same Chinese rabbits in their own laboratory. The Chinese rabbit meat was found to be so grossly contaminated with bacteria that the chain considered the Chinese rabbits to be unsaleable. The nation's consumers are not being protected at this time due to the lack of Mandatory Rabbit Meat Inspection.

FDA, M.L. Gates, Assistant to the Director, Division of Regulatory Guidance, Bureau of Foods, letter to The American Rabbit Breeders Association, Inc., Feb. 19, 1976 advised: "As you are aware, imported rabbit meat is subject to sampling and examination by the FDA when offered for entry into the United States. Our samplings have not indicated that imported rabbit meat (from any country) is unsafe for human consumption. Accordingly, we have no basis to prohibit meat which complies with the laws which we administer or to warn the general public against consuming imported rabbit meat which has been permitted entry into the United States."

RABBIT INDUSTRY questions the validity of the above FDA statement. For example, in 1971, over 100,000 lbs. of imported rabbits from Australia were found to contain decomposed livers, decomposed kidneys, and the diaphragm had not been opened to remove the lungs and the windpipe. The lungs were found to be in bad condition due to respiratory diseases, which included pneumonia.

The FDA has tried to do a better inspection job, but bad rabbits are still shipped to the U.S. The report issued on COMMERCIAL IMPORT DETENTIONS shows another 37,500 lbs. of rabbit meat contained rabbit excreta pellets. This was just recently, in fact 8 days after the FDA report by Mr. M. L. Gates quoted above. A visual examination of rabbit meat containing rabbit manure surely can be spotted by almost anyone, but what about the quality of processing that would permit final product to leave a packing plant with manure visible on the meat?

RABBIT INDUSTRY still wonders why the USDA does not want to assume the responsibility of Mandatory Rabbit Inspection, when this is the only type of inspection that will protect the nation's consumers. It is obvious that the U.S. laws do not authorize the FDA to do the proper type of inspection that is needed.

E. INCREASING COST OF PRESENT VOLUNTARY USDA RABBIT INSPECTION.

RABBIT INDUSTRY says the cost of Voluntary Rabbit Inspection is being priced out of the market! Few, if any, rabbit processors can afford such Voluntary inspection today, nor will they be able to afford it in the future.

RABBIT INDUSTRY income for owners of processing plants is basically less than the USDA charges for Voluntary inspection. This is true in almost every rabbit plant in the nation. Owners basically earn wages per hour, or salaries per week, and the average earnings of most rabbit processors will range between \$5.00 and \$10.00 per hour, with owners working 50 to 60 hours a week to make a living. USDA Voluntary inspection is now billed at \$12.40 an hour. (Oct. 1975 rate)

USDA inspection was only \$6.05 an hour in 1969, so 1975-1976 costs are up 105% in 6 years, or 17.4% per year.

The Cost of Living Index for April, 1976 was approximately 68.2% over the base year of 1967. USDA inspection costs in the Fall of 1975 were 141.9% over the 1967 base, so USDA inspection costs are rising at a rate 100% faster than the Cost of Living Index.

MANDATORY RABBIT INSPECTION IS NEEDED TO PROTECT CONSUMERS, AND TO GIVE EQUAL TREATMENT TO RABBIT PROCESSORS WHO HAVE TO COMPETE IN THE MARKETPLACE WITH OTHER MEATS.

F. WHY SHOULD DOMESTICATED RABBITS BE DISCRIMINATED AGAINST?

RABBIT INDUSTRY MUST PAY FOR USDA INSPECTION.

USDA INSPECTION IS FREE FOR PROCESSORS OF THESE OTHER MEATS:

Chickens	Cattle
Turkeys	Swine
Ducks	Sheep
Geese	Goats
Guineas	Horses
	Mules

RABBIT INDUSTRY produces rabbits in almost every State, and rabbit meat is marketed in every State. Certainly this is not true of several of the above listed species.

WHY ARE DOMESTICATED RABBITS DISCRIMINATED AGAINST?

ENACTMENT OF MANDATORY RABBIT MEAT INSPECTION WILL PLACE RABBITS ON AN EQUAL BASIS WITH OTHER MEAT.

G. WHY DIDN'T RABBITS REQUIRE INSPECTION IN THE PAST, WITH MEAT & POULTRY?

- 1957 - USDA considered including rabbit meat at the time when the Poultry and Poultry Products Inspection Act was being written. At that time there were at least 100 rabbit processors, mostly very small except on the West Coast. Since rabbits were a "last minute thought", and no survey or contact with the rabbit industry had been made, it was decided to leave rabbits out of the bill that was then ready for final presentation to the poultry industry at the Fact Finding Conference in Kansas City, Mo.
- 1972 - When Congress considered Mandatory Rabbit Meat Inspection in the 92nd Congress, and the Senate passed S. 1943, the rabbit industry was not even aware that such legislation was even being considered by Congress until several weeks after the Senate passed the bill. Also, only Poland was then shipping domesticated rabbits to the U. S. at that time. Red China was only then a potential threat, and this was so indicated by the RABBIT INDUSTRY in the House Subcommittee on Livestock and Grains Hearings on HR 8714 on May 4, 1972. The industry asked for more time to consider the need for, and the effects of, Mandatory Inspection. The industry also asked that the USDA make an actual survey in the field of the approximately 60 rabbit processors. No such actual survey has yet been made! (Not after 4½ years as of October 1976)
- 1973 - The Senate again passed a Mandatory Rabbit Meat Inspection bill in the 93rd Congress, S. 43, but the House failed to act. By this time, the industry had been informed and saw the benefits of Mandatory Inspection, particularly after Red China began shipping their low quality, low priced rabbit meat to the U. S. in November 1972. There was a real need for the USDA to have authorization by law to protect the U.S. consumers by requiring that domesticated rabbit meat be properly inspected, particularly rabbit meat from China. Bad rabbits damage all rabbit sales.
- 1974 - No action was taken in the House in the 2nd Session of the 93rd Congress, so Senate bill S. 43 died.
- 1975 - Almost 100% support of the RABBIT INDUSTRY was shown by written approval of S. 16 and HR 1502. The House passed Mandatory Rabbit Inspection legislation, HR 10073 on November 4, 1975, and it was sent to the Senate Agriculture Committee. The need is greater now than ever before for Mandatory Rabbit Meat Inspection, and the threat of imported rabbits is growing. In addition to Poland and China, 13 other countries have offered to ship domesticated rabbit meat to the U.S. Voluntary inspection cost is prohibitive.
- 1976 - Favorable Senate action on S. 16 will finally accomplish what is needed to protect U.S. consumers, build a stronger U.S. rabbit industry, regulate imported rabbit meat, and remove the discrimination that has existed against rabbit meat for many years. (Senate passed HR 10073, Sept. 30, 1976)



Congressional Record

PROCEEDINGS AND DEBATES OF THE 95th CONGRESS, FIRST SESSION

Vol. 123

WASHINGTON, WEDNESDAY, JANUARY 26, 1977

Page 1

MANDATORY RABBIT MEAT INSPECTION

(Mr. SEBELIUS asked and was given permission to extend his remarks at this point in the Record, and to include extraneous matter.)

Mr. SEBELIUS. Mr. Speaker, today, the junior Senator from my State, Bob Dole, and I are introducing a bill which would make rabbit meat inspection mandatory, at Federal cost, by extending the provisions of the Poultry Products Inspection Act to rabbits and rabbit products.

The American consumer is rightfully entitled to healthful, high quality meat. To achieve that purpose, the Federal Government has seen fit to establish mandatory meat and poultry inspection programs within the U.S. Department of Agriculture. In the case of rabbit meat, however, Federal inspection is strictly voluntary—under the Agricultural Marketing Act of 1946—and paid for only by processors who request it. Under this voluntary program, Federal inspectors conduct antemortem inspection of live rabbits and postmortem inspection of the dressed meat.

Nearly half the rabbit meat sold in the United States is imported from such countries as the People's Republic of China and Poland. Little or nothing is known about the quality of rabbit inspection in these two countries. Under the legislation that I am introducing today, imported rabbit meat would be required to be prepared under standards at least equal to those in the United States.

Although imported domesticated rabbit meat is subject to inspection by the Food and Drug Administration to determine compliance with the requirements of the U.S. pure food laws, it does not appear that all shipments are inspected, and it is not clear whether laboratory bacterial testing is conducted on all inspection performed by officials of that Agency.

An additional benefit of this bill would be to encourage rabbit production as a hobby and supplemental income among our youth, elderly and minority populations. Rabbit is tasty, highly nutritious, and low in fat and cholesterol.

I firmly believe that mandatory inspection of the major rabbit processing plants and imported shipments of rabbit meat would insure the American consumer of healthy, sanitary, high quality rabbit meat. Such a move would be in the best interests of both the U.S. rabbit producers and American consumers.

