



UNITED TO GROW FAMILY AGRICULTURE

April 21, 2014

Docket No. APHIS-2009-0017
Regulatory Analysis and Development, PPD, APHIS
Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

To Whom It May Concern:

Thank you for the opportunity to comment on the proposed rule that would allow the importation of beef from several states in Brazil. NFU values the ongoing communication between the U.S. Department of Agriculture (USDA) and our members regarding animal health, trade and other issues.

NFU policy is clear in its position regarding importation of livestock products from countries that have a history of unresolved foot and mouth disease (FMD). The following is an excerpt from the recently adopted grassroots policy statement from NFU members:

“Livestock health is critical to production agriculture and our nation’s ability to provide a safe food supply. Achieving the necessary means to ensure livestock health is a priority for NFU. We support good animal husbandry practices as the primary means of livestock health maintenance, as well as the following initiatives to ensure livestock health:

Ban livestock, animal protein products and meat imports that would jeopardize U.S. efforts to eradicate livestock diseases including BSE and Foot and Mouth Disease (FMD);”

We strongly oppose the proposal to resume importation of fresh beef from the fourteen Brazilian states listed in the federal register notice. NFU members contend that FMD from that region of Brazil still poses a significant threat to U.S. livestock herds. Any changes to the current ban could pose substantial threats to family farmers, ranchers and the general public due to the very real possibility of transmission of FMD to U.S. livestock, resulting in eroded consumer confidence in our food supply.

NFU is concerned by rulemaking processes at the USDA that may weaken disease protection measures critical to protecting domestic livestock from the introduction of FMD and other animal diseases, particularly from Brazil. Inconsistencies between animal health disclosures reported by the Animal and Plant Health Inspection Service (APHIS) and the World Organization for Animal Health (OIE), erode our confidence in the safety of beef imports from countries with a history of FMD presence and a poor food safety record. The U.S. Food and Drug Administration (FDA) recalled Brazilian cooked and canned meat on three occasions in 2010 due to drug contamination.

Previous import bans implemented by USDA have divided our trading partners into sub-national geographic regions that are largely insulated from other livestock-producing areas, thereby limiting risk of FMD transmission. The fourteen states that are being considered by this USDA rulemaking process are but one of the four regions in Brazil. The last case of FMD in the fourteen-state region in Brazil was in 2001. Even though the fourteen Brazilian states in question are considered to be “FMD-Free” by the OIE, regular vaccinations are required. Brazil has not been able to prevent the spread of FMD into its borders from neighboring countries, and as recently as 2011, Paraguay reported two outbreaks of FMD within 250 miles of the Brazilian border.

NFU members are proud of the disease prevention system that has been in place for livestock in the United States, which has not had a confirmed case of FMD since 1929. This is an advantage to be developed and must not be put at risk. There are very few positives associated with allowing livestock products from regions of Brazil that are known to have a history of FMD to be brought into our country. There are many possible undesirable outcomes from such an arrangement. Importing Brazilian beef and other livestock products is a risk not worth taking.

U.S. farmers and ranchers are known throughout the world for the high standards to which livestock herds are raised and our long-standing disease prevention efforts. In the rare instances when disease has impacted a portion of the livestock herd, economic devastation has followed. When Bovine spongiform encephalopathy (BSE) was first identified in the U.S. in December of 2003, sixty-five of our trading partners eventually put partial or full bans on our beef. According to a Kansas State University study, the U.S. beef industry lost between \$2.9 billion and \$4.2 billion in 2004 alone because of BSE. Rural America should not again be subjected to severe losses simply because of lax standards for animal imports.

The economic costs of an FMD outbreak in the United States would be tremendous. A 2002 study conducted by Purdue University and the Centers for Epidemiology and Animal Health at APHIS found that if an epidemic similar to the outbreak that occurred in the U.K. in 2001 were to strike the United States, a loss of \$14 billion in U.S. farm income (in 2002 dollars) would result. This includes costs of quarantine and eradication of animals, a ban on exports, and reduced consumer confidence.

On behalf of NFU members, I urge USDA to defend family farmers and ranchers by turning back this attempt to loosen restrictions on imports from countries that are affected by FMD. Thank you for your consideration.

Sincerely,



Roger Johnson
President