



December 29, 2014

Regulatory Analysis and Development, PPD
Animal and Plant Health Inspection Service, USDA
Station 3A-03.8
4700 River Road Unit 118
Riverdale, MA 20737-1238

Attention: Docket ID No. APHIS 2014-0032: Importation of Beef from a Region in Argentina

Dear Administrator Kevin Shea:

National Farmers Union (NFU) welcomes the opportunity to submit comments to the Animal and Plant Health Inspection Service (APHIS) on the proposed rule regarding the importation of beef from Northern Argentina. NFU is the second-largest general farm organization in the United States. Since 1902, NFU has advocated for the economic and social well-being and quality of life of family farmers and their communities by supporting the sustainable production of food, fiber, feed and fuel. NFU represents nearly 200,000 members nationwide, with members in all 50 states and organized divisions in 33 states. NFU is a federation of state and regional organizations.

NFU policy, enacted annually by delegates to the organization's national convention, states, "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."¹ NFU supports banning livestock, animal protein products, and meat imports that would jeopardize U.S. efforts to eradicate livestock diseases, including foot and mouth disease (FMD). In light of these important policy goals, NFU opposes the proposed rule to resume importation of fresh beef from Northern Argentina and fresh beef and ovine meat from Uruguay.

APHIS acknowledges that Northern Argentina is not considered to be free of FMD.² The World Organization for Animal Health (OIE) has designated zones of Argentina as free of FMD with vaccination and the Patagonia region as FMD-free without vaccination. In May of 2000, the OIE designated Argentina as FMD-free without vaccination. Just two months later, FMD outbreaks reappeared,

¹ Nat'l Farmers Union, *2014 Policy of the National Farmers Union 18 (2014) available at* <http://www.nfu.org/images/03%2011%2014%20FINAL%202014%20POLICY%20CLEAN%20COPY.pdf>.

² "Importation of Beef From a Region in Argentina," 79 Fed. Reg. 51508 (August 29, 2014)(amending 9 CFR part 94).

culminating in the epidemic outbreak in 2001.³ Since then, Argentina has made multiple unsuccessful attempts to eradicate and control FMD. Additionally, Argentina concealed the outbreaks from the international community for months.

The economic impacts of a FMD outbreak in the U.S. would be tremendous. FMD is highly contagious and has the potential to spread very quickly. Given the rapidity with which FMD spreads, an outbreak would create devastating economic consequences for farmers and ranchers. Recent research has estimated outbreaks in FMD-free countries and zones cause losses of greater than \$1.5 billion per year.⁴

Although outbreaks of livestock diseases in the U.S. are rare, the economic impacts are devastating when they do occur. When bovine spongiform encephalopathy (BSE) was first identified in the U.S. in December of 2003, sixty-five of the U.S.' trading partners eventually put partial or full bans on U.S. beef. According to a Kansas State University study, the U.S. beef industry lost between \$2.9 and \$4.2 billion in 2004 because of BSE.⁵ Rural America should not be subjected to the risk of severe losses because of lax standards for animal imports.

In 2001, an outbreak of FMD in the United Kingdom (UK) resulted in the slaughter or burn of nearly 3 million animals.⁶ The epidemic was costly both to farmers and the economy. The total losses to agriculture and the food chain amounted to roughly £3.1 billion.⁷ Prior to the 2001 outbreak, the UK had gone 34 years without an outbreak. This particular example demonstrates that no country is immune to the devastating impacts of a FMD outbreak and the utmost precaution should be taken when evaluating changes in import status from countries with a recent history of FMD.

U.S. farmers and ranchers are known throughout the world for the high standards to which their livestock herds are raised. Our long-standing disease prevention efforts have thus far been successful.

³ Smitsaart, E., Mattion, N., Mazzuca, G., Robiolo, B., Maradei, E., Filippi, J. & Bellinzoni, R. (2002). Foot-and-mouth disease in Argentina: development of vaccines for emergency, control and eradication of the disease. *Report of the Session of the FAO Research Group of the Standing Technical Committee of the European Commission for the Control of Foot-and-Mouth Disease*, 17-20.

⁴ Knight-Jones, T. J. D., & Rushton, J. (2013). The economic impacts of foot and mouth disease—What are they, how big are they and where do they occur?. *Preventive veterinary medicine*, 112(3), 161-173.

⁵ Coffey, B., Mintert, J., Fox, S., Schoreder, T., & Valentin, L., (2005). The economic impact of BSE on the U.S. beef industry: product value losses, regulatory costs, and consumer reactions. <http://www.ksre.ksu.edu/bookstore/pubs/MF2678.pdf>

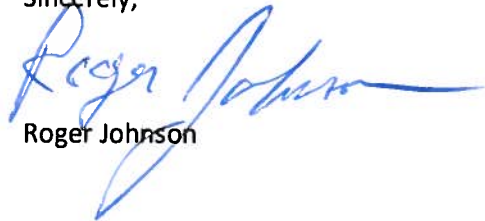
⁶ Freedland, J. (2001, May 15). A catalogue of failures that discredits the whole system: There must be a public inquiry into the foot and mouth saga. *The Guardian*. Retrieved from <http://theguardian.com>.

⁷ Thompson, D., Muriel, P., Russell, D., Osborne, P., Bromley, A., Rowland, M. & Brown, C. (2002). Economic costs of the foot and mouth disease outbreak in the United Kingdom in 2001. *Revue scientifique et technique-Office international des epizooties*, 21(3), 675-685.

The U.S. has not had a confirmed case of FMD since 1929. This is an advantage the U.S. has developed in the global livestock economy and must not be put at risk. Allowing imports from regions that have a history of FMD is a risk that outweighs the benefits. Expanding trade should not come at the expense of America's herd health.

On behalf of NFU members, I urge APHIS to defend family farmers and ranchers and their livelihoods by retaining the highest standards for imports. Thank you for your consideration of these comments.

Sincerely,



Roger Johnson