



November 17, 2015

Dr. Daniel Englejohn
Assistant Administrator
Office of Policy and Program Development
Food Safety and Inspection Service
U.S. Department of Agriculture
1400 Independence Ave SW, Mailstop 3782
Washington, DC 20250

Re: Eligibility of Namibia to Export Meat Products to the United States; Docket No. FSIS-2012-0028

Dear Dr. Englejohn:

National Farmers Union (NFU) welcomes the opportunity to submit comments to the U.S. Food Safety and Inspection Service (FSIS) on the proposed rule to add Namibia to the list of countries whose meat inspection system is equivalent to the system of the U.S, thus allowing for the importation of Namibian beef.

NFU is a grassroots family farm organization. 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 more than 200,000 farm families nationwide, with organized divisions in 33 states.

NFU opposes the proposed rule to make Namibia an eligible country to export meat products to the U.S. This is the final step for allowing for importation of beef from Namibia, with only one additional step remaining for importing other types of livestock. Earlier this year, delegates to the annual NFU convention placed a special emphasis on policy to protect the domestic livestock herd from highly contagious diseases such as foot-and-mouth disease (FMD). NFU's 2015 special order of business on animal disease protection states, "NFU calls upon the administration to defend U.S. farmers and ranchers by opposing imports of live animals and processed or frozen animal products from countries or regions with a history of FMD. The economic livelihood of producers and the health of consumers is critical and at stake."¹

Of chief concern to NFU is the impact this decision could have on family farmers and ranchers. In 2006, the Animal and Plant Health Inspection Service (APHIS) proposed to add Namibia to the list of regions that are considered free of FMD with the exception of north of the Veterinary Cordon Fence (VCF). It is unclear when that rule was finalized. Earlier this year Namibia had an outbreak of FMD north of the VCF. The Namibian government has said repeatedly that it would like to remove the VCF due to the social and

¹ Nat'l Farmers Union, *2015 Policy of the National Farmers Union* (2015) available at <http://www.nfu.org/nfu-2015-policy/2066>.

economic inequalities it has created and perpetuated. If the government removes the VCF prior to elimination of all contagious animal diseases, such as FMD, then the U.S. could potentially import infected meat from the country.

The fear over FMD is warranted. An outbreak would have devastating consequences on our domestic livestock industry. In recent memory, the outbreak of FMD in the United Kingdom (UK) resulted in the slaughter and/or burning of nearly 3 million animals. This outbreak was so severe, it delayed the national elections. The epidemic was costly both to farmers and the economy. The total losses to agriculture and the food chain amounted to over \$4 billion.² 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.

The U.S. has been very fortunate that an outbreak has not occurred in the states since 1929. With an increasingly global agricultural economy, the U.S. should remain vigilant and adequately weigh the risks and benefits when seeking to expand imports. The health of the domestic herd is not only vital to the livelihoods of farmers and ranchers, but the U.S. exports over one million metric tons of beef every year across the world.³ The U.S. agriculture sector is vital to addressing the food needs of many other countries. The U.S. government must use every tool at its disposal to ensure an outbreak does not occur on U.S. soil.

Although beef prices have been higher than average in recent years due to the drought and a decreased herd size, the herd is expanding quickly and prices are dropping.⁴ If the motivation for allowing for greater beef imports into the country is cheaper prices for consumers, the price drop is already underway. Ranchers will be facing lower prices than they have seen in years.

NFU encourages USDA to delay the FSIS approval of Namibia as an exporter of beef until APHIS reevaluates the status of FMD in the country, given the latest outbreak. Furthermore, APHIS classification of Namibia as free of FMD and rinderpest south of the VCF, includes qualifications that make this proposed rule even riskier. This qualification means that Namibia has a greater risk than other countries on the list of FMD free zones because they either supplement their national meat supply through imports of meat from countries or regions that are not FMD free; or they have a common land border with countries/regions that are not designated as free of FMD (in this case, Namibia shares a border with Botswana); or they import ruminants or swine from countries that are not free of FMD with fewer restrictions than would be acceptable in the U.S.

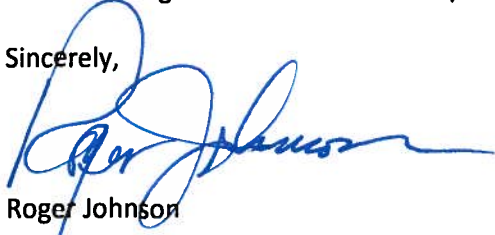
² Thompson, Donald, et al. "Economic costs of the foot and mouth disease outbreak in the United Kingdom in 2001." *Revue scientifique et technique-Office international des epizooties* 21.3 (2002): 675-685.

³ U.S. Meat Export Federation, *Total Beef Exports 2005-2014* available at <https://www.usmef.org/downloads/Beef-2005-to-2014.pdf>.

⁴ Forbes, *Cattle Futures in Free Fall Confirm Expectations for Collapse in Beef Prices* (2015) available at <http://www.forbes.com/sites/thomaslandstreet/2015/10/05/cattle-futures-in-free-fall-confirm-my-expectations-for-a-collapse-in-beef-prices/>.

Thank you for consideration of this request. Should you have any questions or comments, please contact NFU government relations representative Barbara Patterson at bpatterson@nfudc.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Roger Johnson", with a long horizontal flourish extending to the right.

Roger Johnson
President