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December 4, 2009

Docket No. APHIS--2009-0006
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Re: Comments on **Docket No. APHIS-2009-0006**

To Whom It May Concern:

The United States Cattlemen's Association (USCA) is pleased to submit the following comments to APHIS' Veterinary Services (VS) Concept Paper, "A New Direction for the Bovine Brucellosis Program." Great strides have been made in the last ten years to eradicate Bovine Brucellosis in the United States, and USCA believes that this concept paper is a positive step toward the complete elimination of Bovine Brucellosis from the United States.

First off, mitigating Bovine Brucellosis from wildlife needs to be the highest priority. The Greater Yellowstone Area (GYA) seems to be the focus of the last remaining Brucellosis infection in the U.S., and needs to be addressed immediately. We support designating a GYA disease management area. A full time USDA person should be appointed to deal with brucellosis in disease management areas. This individual would work and coordinate with the state officials included in the disease management area.

Zoning or disease management areas are acceptable for mitigating a disease like Bovine Brucellosis, but USCA has concerns about declaring zones for all disease mitigation and eradication efforts. We do not support this approach for mitigating and eradicating a highly contagious disease such as Foot and Mouth Disease (FMD).

It's extremely important that VS work with wildlife authorities to conduct an assessment that seeks to determine why there has been a recent increase in the cases of brucellosis transmission in the GYA. This is disconcerting given the fact that this region has previously experienced an extended period of time in which there were no discovered disease cases. USCA believes that a key to the eradication efforts could be linked to solving this anomaly.

USCA is greatly concerned about USDA's reference of the need for the full implementation of an animal identification (ID) system. There is no doubt that an animal ID system would be beneficial to animal health officials conducting disease tracebacks within the domestic livestock herds. However, animal ID in no way addresses the problems created by the Bovine Brucellosis originating in wildlife. The ID costs borne by cattle producers have been determined to be

excessive in relation to other protein based food producing species. It is physically impossible to tag all wildlife, and it's the opinion of USCA that it makes no sense to impose full implementation of an animal ID system on the cattle industry. The cost burden to cattle producers to implement a comprehensive animal ID system would mostly likely prove to be more damaging to the U.S. cattle industry than the current setting that involves a few isolated cases of Bovine Brucellosis.

Currently a major barrier exists that prevents a successful disease eradication plan from being implemented. It is for this reason that USCA supports the United States Animal Health Association's Resolution #36 passed in October of 2009 and a letter dated November 18, 2009 from the National Assembly of State Animal Health Officials addressed to Dr. Thomas Frieden, Administrator for Toxic Substances and Disease Registry at the Centers for Disease Control and Prevention, and to Ms. Cindy Smith, Administrator of USDA/APHIS. This letter requests that the select agent designation of *Brucella abortus* be removed. Technological limitations in vaccine development and diagnosis of brucellosis are limiting factors in eliminating the disease from elk. The current select agent framework prevents the advancement of vaccine technology for elk and this will continue to have a dramatic effect on livestock. Changing this regulatory barrier will go a long way in assisting the surveillance and eradication of Bovine Brucellosis.

In closing it's been a long and trying process in dealing with Bovine Brucellosis. Now is the time to take the needed steps that will ensure success. USCA supports a reasonable and cost effective approach that will make this happen. Good stakeholder communication is critical to the effort. USCA appreciate APHIS' VS efforts to completely eradicate this disease and we think that the course mapped out in this concept paper will get us to the finish line and result in the U.S. being a Brucellosis free country.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jon Wooster", with a long horizontal flourish extending to the right.

Jon Wooster, President