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Federal Register

Docket No. APHIS-2014-0032

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-2014-0032**—Importation of Beef From a Region in Argentina

To Whom It May Concern:

On behalf of the United States Cattlemen's Association (USCA) and its nationwide membership of cow-calf operators, backgrounders and feedlot operators, thank you for the opportunity to comment on the Federal Register Notice: *Docket No. APHIS-2014-0032, Importation of Beef From a Region in Argentina* as originally posted on August 29, 2014.

As stated in the Federal Register notice, the United States Department of Agriculture-Animal and Plant Health Inspection Service (USDA-APHIS) has proposed a rule that "would allow, under certain conditions, the importation of fresh (chilled or frozen) beef from a region in Argentina located north of Patagonia South and Patagonia North B, referred to as Northern Argentina." USCA opposes this proposed change in trading status with the stated region, hereby referred to as Northern Argentina. The import of fresh beef products from Northern Argentina would place the overall health of the U.S. cattle herd at tremendous risk. USCA offers the following comments:

Economic Loss

The United States is currently facing historically low cattle herd inventories. The impact of losses on an already contracted herd from an outbreak of foot and mouth disease (FMD) in the U.S. would be catastrophic to the industry and the national economy. The potential economic losses can be extrapolated through multiple means: 1) depopulation of herds resulting not only in the immediate loss of livestock as well as the genetics in those cattle, which have been carefully developed and invested in; 2) quarantine measures, including the closure of any infected premises; 3) disease control measures including the cost of developing and mobilizing appropriate vaccines and implementation of a vaccination program; 4) the disposal of diseased livestock; 5) loss of wildlife and subsequent impact on hunting and recreation; and 5) disruptions in trade as a result of a change in the United States' FMD status through the World Animal Health Organization (OIE).

A 2009 study conducted by Kansas State University modeled the effect of an FMD outbreak in a 14-county region in southwest Kansas, which is an area of highly concentrated cattle production. The study modeled the potential effects of an FMD outbreak on the entire state based on various sizes of cattle operations. The study concluded that an FMD outbreak within a single cow-calf operation would contribute to an overall loss of 126,000 head of livestock in the state and a combined loss of \$23 million dollars.

An outbreak of FMD in the United Kingdom in 2001 resulted in the slaughter of 6.1 million animals, devastating the agriculture industry, the economy and subsequently straining resources to the breaking point. The devastating effects of FMD cannot be overstated.

It has been calculated by the OIE¹ that an FMD outbreak in the United States could result in \$14 billion in losses calculated to include both farm income and the effect on consumers and international trade relations. The risks and implications associated with this proposed change in trading status are very serious and USCA opposes any action that jeopardizes the health and wellbeing of the U.S. cattle herd.

Proximity

The regions to be included in the area of Northern Argentina include the Patagonia region in addition to areas of North Central Argentina such as Cordon Fronterizo. As listed in the Environmental Assessment (EA), which accompanied this rule and was originally published in April 2014, Patagonia South and Patagonia North B have been declared FMD free, while the region of Cordon Fronterizo is declared FMD free with vaccination. However, the remaining regions in Argentina, as well as multiple countries across South America, are listed by the OIE as both FMD free with vaccination or as containing FMD. It should be noted that the FMD free with vaccination classification is justified in the assessment by a response that the vaccination is in place to protect against neighboring countries and regions that still contain FMD. The U.S. holds an OIE classification as FMD free without vaccination.

The EA specifically references regions directly bordering the area slated by USDA-APHIS for importation. Bolivia, Uruguay, Chile and Brazil all border the area in question. Of these regions, only Chile and the State of Santa Catarina, Brazil have been classified as FMD-free. The EA states, “APHIS considers the regions along the northern borders with Bolivia, Brazil and Paraguay to constitute a potential source of vulnerability for Argentina as there is a potential risk of reintroduction of FMD from those countries.” The EA further states that the supposed enhancements made by SENASA (Servicio Nacional de Sanidad y Calidad Agroalimentaria) to its prevention and response measures have led APHIS to believe that “these enhancements in border control activities and infrastructure provide adequate monitoring and control of the disease in the event of a potential introduction.” USCA is adamant that far more than an “adequate” level of monitoring techniques must be in place before any action toward trade is taken.

Additionally, the statement by USDA-APHIS stating, “most of the Argentine border is protected by natural barriers that help reduce the unrestricted flow of animals and animals products from areas of higher risk” does not inspire confidence in the Argentine inspection and surveillance system. The reliance on natural barriers to protect against FMD is an inadequate prevention tool

¹ *The Impact of Foot and Mouth Disease:* <http://www.oie.int/doc/ged/D11888.PDF>

for a region that shares multiple borders with countries known to have FMD or are FMD free with vaccination.

It is unclear exactly what exact border control and bio-security measures exist between the Northern Argentina region and neighboring entities to prevent the introduction of disease. It is also unclear whether a preparedness plan is in place that could effectively and swiftly deal with a disease outbreak. Wildlife transmission of FMD is of concern in any region with potential FMD presence, and the lack of a comprehensive assessment of their potential role in transmitting the disease is concerning. The EA states the following, “with a few exceptions, excretion and transmission of FMD by wildlife has not been studied in any detail.” The report continues, “however, despite the fact that several South American wildlife species are susceptible to FMD, their role in the epidemiology of FMD is considered to be insignificant...and that transmission of FMD and contamination of domestic ruminants by wildlife is unlikely.” USCA asks USDA-APHIS to conduct a thorough review of this issue before moving forward with any discussion on trade with the Northern Argentina Region.

Site Visits

As stated in the USDA-APHIS Risk Assessment, site visits to the Northern Argentina region were conducted in 2005, 2006 and 2013². USCA strongly urges a more robust surveillance program by the U.S. prior to any consideration of beef trade; three visits made to the region in question is not adequate. The locally-based response effort in the region’s comprehensive preparedness plan is to be commended; however, a national and more robust oversight of these activities is necessary. The number of livestock that will be transported if trade is to be initiated necessitates a more comprehensive national and local coordination.

Also stated in the USDA-APHIS EA³, the last FMD outbreaks to take place in Argentina were reported in 2003 and 2006. The 2006 outbreak was found in the northeast region of the country. The last FMD outbreak to occur in South America was reported in 2012 in Paraguay. In contrast, the last outbreak in the United States was in 1929 and as stated, “previous outbreaks of FMD in the United States have been very costly to contain and eradicate.” USCA’s main concern regarding this proposal is the severity of the disease at issue. Every safeguard and prevention measure must be firmly in place before any discussions should even be initiated regarding trade with a region or continent known to have FMD.

Transportation, PH Monitoring

The survival of the FMD virus depends on the pH level maintained in the beef product being shipped. As stated in the EA, there are a number of scenarios and variables that impact the viability of the FMD virus: “sunlight, temperature, pH changes, relative humidity and the dilution effect of rain and melting snow.” Specifically for this proposed rule, the change in pH levels is of concern to USCA. The proposed import process of beef products from the region in question brings with it multiple issues that could ultimately impact overall pH levels and thus, the continued viability of the FMD virus in transit from Argentina to the U.S.

As stated in the Risk Analysis, “after death, anaerobic glycolysis takes place in muscle tissues and stored glycogen is converted to pyruvate, which is then reduced to lactic acid resulting in a fall in pH, ultimately to a value of 5.6 - 5.7 (Foegeding, et al., 1996). Puolanne et al. (2002) have

² <http://www.regulations.gov/#!documentDetail;D=APHIS-2014-0032-0080>

³ <http://www.regulations.gov/#!documentDetail;D=APHIS-2014-0032-0082>

calculated that a decline in pH from 7.0 to 5.5 (ultimate pH) requires the formation of 60 to 80 mmol lactic acid per kg muscle tissue depending on the muscle tissue and the animal species. This has an important impact on FMDV survival because the virus is inactivated by acid conditions; as well as an extremely important influence on food safety and quality of the final product (deboned meat). The accompanying depletion of ATP is responsible for rigor mortis (stiffening of the muscle) which normally takes 6 – 12 hour for beef muscle. Glycogen can be depleted by several pre-slaughter stress conditions including exercise, fasting, hot and cold temperatures and fear (Lister, et al. 1981), resulting in reduced muscle tissue acidification and improved survival conditions for FMDV.”

The analysis comments on the multiple factors needed to ensure that the virus is not transmitted, “good transportation conditions, handling and animal welfare practices are crucial to obtain DB with an ultimate pH value of 5.8 or lower after aging or maturation (EU, 2002). There is approximately 1% glycogen in the muscle tissue and this will generate 1.0 to 1.1% lactic acid. For each 1% lactic acid formed the pH will be lowered by approximately 1.8 pH units. Nonetheless, both the rate of pH fall and the ultimate pH achieved are influenced by factors such as species, type of muscle in an animal, genetic variability between animals, administration of drugs which affect metabolism, environment prior to slaughter (feeding, stress), post-mortem temperature - increased temperature increases rate of pH decline - and electrical stimulation of excised muscle increases rate of pH decline (Ockerman, 1996).”

The precise protocol that must be followed, from initial handling practices to final shipment, is finite and something that cannot be compromised. USCA is not confident, given past actions by the country in question, that U.S. producers can be assured that the product to be shipped by the region is in fact compliant with all proper guidelines and best practices.

Argentina Impact

As stated by the USDA Foreign Agricultural Service⁴, the Argentine cattle herd is expected to reach over 53 million head by the end of 2014. The domestic population in Argentina consumes a large portion of the product that originates in the country, thus resulting in great activity and transit between regions for access and delivery of beef and meat products. While domestic consumption is projected to remain strong, over 460,000 tons of beef product is expected to be traded in the international market. The strong market activity and necessary transportation that must occur to maintain these levels will result in even greater risk of contamination and infection across regional boundaries.

The seriousness of the risks associated with the proposed notice requires a more thorough review and consideration than what has been given. USCA opposes the importation of fresh beef products from the region referred to as Northern Argentina. USCA urges the administration to reconsider the change in trading status in light of the potential economic, animal health and international trade consequences that could result from the importation of beef products from the region.

Please contact USCA Executive Vice President Jess Peterson at 202-870-3867 or by email at jess@wssdc.com for further information or clarification regarding any of USCA’s concerns.

⁴ *Global Agricultural Information Networking (GAIN) Report*
http://gain.fas.usda.gov/Recent%20GAIN%20Publications/Livestock%20and%20Products%20Annual_Buenos%20Aires_Argentina_9-11-2013.pdf

Regards,

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