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April 22, 2014

Federal Register

Docket No. APHIS-2013-0105

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-2013-0105**-- Evaluations; Availability: Foot-and-Mouth Disease and Rinderpest Status, Patagonia, 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-2013-0105, Evaluations; Availability: Foot-and-Mouth Disease and Rinderpest Status, Patagonia, Argentina* as originally posted on January 23, 2014.

As stated in the Federal Register notice, the United States Department of Agriculture-Animal and Plant Health Inspection Service (USDA-APHIS) has determined that a region of Argentina is free of foot and mouth disease (FMD). The region specified is Patagonia South and Patagonia North B. USCA opposes this change in status. The classification and listing of these two regions could lead to the future opening of trade between the U.S. and the region of Patagonia. 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 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 U.S. 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 stated that an FMD outbreak within a single cow-calf

operation would contribute to an overall loss of 126,000 head within the state and a combined cost 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 strained resources to the breaking point. The devastating effects of FMD cannot be overstated.

It has been calculated by the OIE¹ that a FMD outbreak within 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 are very serious and USCA opposes any action that jeopardizes the health and well-being of the U.S. cattle herd.

Proximity

The regions of Patagonia South and Patagonia North B have been declared as FMD free; 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. The U.S. holds an OIE classification as FMD free without vaccination. It is unclear exactly what border control and bio-security measures exist between Patagonia and neighboring entities to prevent the introduction of disease. It is also unclear whether Patagonia has any preparedness plan in place to effectively and swiftly deal with a disease outbreak.

As stated within the USDA APHIS Risk Analysis, since 2005², only three site visits have been conducted by USDA-APHIS to the region in question. USCA strongly urges a more robust surveillance program by the U.S. prior to any consideration of beef trade.

Also stated within the USDA APHIS Risk Analysis³, the last FMD outbreak to take place in the Patagonia region occurred in 1994 in which six cases were reported and a total of 565 cattle, 8,286 sheep and 296 pigs were “stamped out” per policy. The virus was reported as originating through Patagonia North B and entering through infected bovine slaughtered in the region or through the movement of infected bone-in beef and offal. Further reports indicated the disease was spread through the feeding of contaminated slaughter waste to swine. While the event in question took place 20 years ago, the path taken to bring the disease into the region still remains viable today and demands the assurance of producers that stringent bio-security and border protections are in place.

Argentina Impact

As stated within the USDA Foreign Agricultural Service⁴ the Argentina 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

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

² http://www.aphis.usda.gov/newsroom/2014/01/pdf/Patagonia_Region_Risk_Analysis_Final.pdf

³ http://www.aphis.usda.gov/newsroom/2014/01/pdf/Patagonia_Region_Risk_Analysis_Final.pdf

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

must occur to maintain these current levels will result in even greater risk of contamination and infection across regional boundaries.

USCA opposes the change in classification of the regions of Patagonia as FMD Free. USCA urges the Administration to reconsider the listing in light of potential economic, animal health and international trade ramifications that could result from any change in the current trade status with the region.

We welcome your feedback and comments to the concerns listed above. Please contact USCA Executive Vice President Jess Peterson at [202-870-3867](tel:202-870-3867) or by email at jess@wssdc.com for further information or clarification regarding any of the above stated concerns.

Regards,

A handwritten signature in black ink, appearing to read "Jon Wooster", with a stylized flourish at the end.

Jon Wooster
President
United States Cattlemen's Association