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November 17, 2015

Federal Register

Docket No. FSIS-2012-0028

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

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. FSIS-2012-0028, Eligibility of Namibia to Export Meat Products to the United States* as originally posted on September 18, 2015.

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 "add Namibia to the list of countries eligible to export meat products to the United States". USCA opposes this proposed change in trading status with the stated region, hereby referred to as Namibia. The import of boneless (not ground) raw beef products, such as primal cuts, chuck, blade, and beef trimmings from Namibia results in an immediate threat on the overall health of the U.S. cattle herd. USCA offers the following comments:

Economic Loss

The United States is currently facing historically low cattle herd numbers. 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 straining 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 associated with this proposed change in trading status with Namibia are serious and USCA opposes any action that jeopardizes the health and well-being of the U.S. cattle herd.

Proximity

The regions to be included within the stated area of Namibia include both the Northern and Southern regions. Namibia's livestock industry is divided into two zones by the Veterinary Cordon Fence (VCF). The VCF, built in the mid-1960s, stands more than 550 miles long, and is considered a stock-proof and game-proof fence; passable at 9 permanent check points. The fence represents a Critical Control Point for FMD within the country, and is monitored as such. North of the VCF is the FMD-infected zone, whereas south of the VCF is considered by the OIE as a "FMD free zone where vaccination is not practiced." 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 the neighboring countries and regions who still contain FMD. The U.S. holds an OIE classification as FMD free without vaccination.

Also indicated within the OIE's official FMD Status Map are specific mentions to the regions directly bordering the area proposed for trade. Angola, Zambia, Botswana, and South Africa all border the area in question; of these regions, only South Africa and Southern Botswana have been classified as FMD-free without vaccination. According to the Meat Board of Namibia's own risk analysis¹, "FMD is a regional problem; the sudden and unexpected up-surge in occurrence of cattle outbreaks in the last 10-12 years presenting a major regional problem." The report continues to state that the threat posed by FMD to Namibia's livestock and meat exports has increased substantially." USCA is adamant that greater confidence in the stated region's control of FMD must be in place before any action toward the proposed change in trade status is taken.

Additionally, the following statement from the Meat Board of Namibia's own study inspires less than the utmost of confidence in the region's regulatory measures, "It was concluded that FMD...presents significant risks of entering the export zone and causing outbreaks with potentially unfortunate economic consequences. These risks arise predominantly from the possibility of infected animals, both wild and domestic, entering the export zone by crossing the fencing system that protects the north-east region of the country." The reliance on natural barriers against carriers of FMD is an inadequate prevention tool for a region that shares multiple borders with countries known to have FMD or are classified as FMD-free with vaccinations.

¹ *RISK ANALYSIS ON ANIMAL DISEASE HAZARDS ASSOCIATED WITH IMPORT OF ANIMAL COMMODITIES (INCLUDING LIVE ANIMALS) AND PRODUCTS INTO NAMIBIA AND CONSEQUENCES THEREOF*
<http://www.nammic.com.na/jdownloads/Circulars/RiskAnalysis-2012.pdf>

It is unclear exactly what exact border control and bio-security measures exist between Namibia 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. USCA requests USDA FSIS to conduct a thorough review of this issue before moving forward with any discussion on trade with Namibia.

Wildlife transmission of FMD is of concern in any region with potential FMD presence, the lack of a comprehensive assessment of wildlife's potential role in transmitting the disease is concerning. Of particular concern, the region's African buffalo populations are considered to be persistent carriers of FMD. Documented cases of wildlife crossing into Namibia through the Zambezi River at shallow points elicits concern that diseased populations can move freely into and out of the country, and may contact domestic cattle herds.

According to the World Organization for Animal Health, there are no enforceable barriers between Namibia and Angola, with Angola having declared several recent cases of FMD outbreaks. As stated by the OIE:

"This is the 900 km long fence separating the buffer from the surveillance zone in the northern region. It is an excellent double fence (a game fence separated by 5 meters from the stock fence), which is maintained by repair teams. One problem for the destruction of the fence is trespassing elephants. The fence is crossed by a major highway at Oshivelo. The gate is controlled by police and veterinary services. Every passing vehicle has to show a licence, and trailers and luggage compartments are inspected. No cloven hoofed animals (except small ruminants with a permit after quarantine) are allowed to pass the fence to the south of Namibia, nor are meat products from cloven hoofed animals (except in sealed containers from approved abattoirs) or raw and fresh milk of these species. We note that it is unlikely that a live animal could pass this gate; however it cannot be excluded that meat products might be brought into the southern part of Namibia. Although all vehicles are checked for cool boxes etc., we did not see the inspection of the inside of e.g. suitcases. However, public awareness as to this prohibition seems to be quite high, and there have not been FMD outbreaks in the South for at least the past twenty years. There are no or only limited game farms in the north, and only processed trophies may be brought south. Flyers with the rules are available at the gate."

The country's elephant population has been known to traverse the Veterinary Cordon Fence, causing damage to the fence line which allows other wildlife to travel freely between the country's Northern and Southern regions. Though veterinary service employees work to repair damaged fence lines, there is still plenty of opportunity for FMD-infected wildlife to pass between the regions. USCA requests USDA FSIS to conduct a thorough review of this issue before moving forward with any discussion on trade with Namibia.

¹ Page 58 of the OIE Mission Report Evaluation of the Veterinary Services of the Republic of Namibia, August 11-22, 2008: http://www.oie.int/fileadmin/Home/eng/Support_to_OIE_Members/docs/pdf/Namibia_OIE-PVS_28012009.pdf



Figure 1. Elephant crossing the VCF on the Ehi-Rovipuka and Omantendeka Communal Conservancies in Namibia. Reprinted from *Namibia: Leopard and Plains Game Safari* by Fred Bezuidenhout. 2006.

Site Visits

As stated within the USDA Food Safety and Inspection Service audit, specific visits to Namibia were conducted in 2006, 2009, 2013 and 2014². USCA strongly urges a more robust surveillance program be enacted prior to any consideration of trade as four visits specifically made to the region in question is not adequate. The local-based response effort is a positive component within the region's comprehensive preparedness plans; however, a national and more robust oversight of these activities is necessary. The number of livestock transported throughout the country if trade is enacted necessitates a more comprehensive national and local approach than what is currently in place.

Also stated within the USDA APHIS Summary of Selected Disease Events October - December 2007³, Namibia reported five FMD outbreaks beginning November 2007. The 2007 outbreak was found in the Caprivi region. The suspected cause of the outbreak was contact with wild buffalo and cattle smuggled into the country illegally from Zambia. 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, and any proposed trade changes with countries known to have FMD, is the severity of the disease at hand. Every safeguard and prevention measure must be firmly in place before any discussions may be initiated with such regions.

Transportation, PH Monitoring

The survival of the FMD virus depends on the pH level maintained in each beef product shipped. According to a previous USDA APHIS Risk Assessment regarding the likelihood of exporting FMD-infected beef to the U.S. from Argentina⁴, there are a number of scenarios that can 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 utmost concern to USCA. The proposed import process of beef products from the Namibian region in question brings with it multiple issues of concern that could ultimately impact overall pH levels and thus the continued viability of the FMD virus in transit from Namibia to the U.S.

² <http://www.regulations.gov/#!documentDetail;D=FSIS-2012-0028-0001>

³ https://www.aphis.usda.gov/animal_health/emergingissues/downloads/Q42007.pdf

⁴ <http://www.regulations.gov/#!documentDetail;D=APHIS-2014-0032-0082>

As stated within that same 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 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 as the virus is inactivated by acidic conditions; thus ultimately impacting the overall quality and safety 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 hours 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 continued to comment 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 ageing 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 that U.S. producers can be assured that the product shipped by the region is in fact in line with all proper guidelines and safe-handling practices.

Namibia Impact

As stated by the USDA Foreign Agricultural Service⁴, the Namibian cattle herd is approximately two million with an estimated 400,000 head of cattle marketed annually. Namibia exports a large portion of their beef, thus resulting in great activity and transit between neighboring regions. While domestic consumption is projected to remain constant, over 100,000 tons of beef product is expected to be traded in the international market. The maintenance of a strong export market in Namibia and resulting transportation demands equates into even greater risk of contamination and infection across regional boundaries.

The precarious nature of FMD and what is proposed within the FSIS notice mandates a more thorough review and consideration than what has been given. USCA requests the Administration to halt any action taken toward amending the current trade status with Namibia in light of potential economic, animal health and international trade harm. As a result, USCA opposes the proposed notice for the importation of fresh beef products from the region referred to as Namibia by the USDA.

⁴ *Global Agricultural Information Networking (GAIN) Report*
http://gain.fas.usda.gov/Recent%20GAIN%20Publications/Success%20Story%20-%20New%20Market%20Access%20for%20U.S.%20Bovine%20Semen%20_Pretoria_Namibia_3-27-2014.pdf

USCA welcomes 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 blue ink that reads "Danni Beer". The signature is written in a cursive, flowing style.

Danni Beer
President
United States Cattlemen's Association