October 16, 2009

Ms. Nancy Sutley,
Chair, Interagency Ocean Policy Task Force
Chair, White House Council on Environmental Quality
722 Jackson Place
Washington, DC 20503


Dear Ms. Sutley,

The American Veterinary Medical Association (AVMA), established in 1863, is the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The association’s more than 79,000 members represent approximately 85% of U.S. veterinarians, all of whom are involved in a myriad of areas of veterinary medical practice, including private, corporate, academic, industrial, governmental, military, and public health services.

The AVMA recognizes and strongly agrees with key components of the “Interim Report of the Interagency Ocean Policy Task Force”, including the need for science based environmental stewardship practices, agency and organizational transparency, and stakeholder collaboration. Unfortunately, the extremely brief timeframe in which the Task Force has to fulfill its daunting tasks, combined with the vast number and range of ecosystems, animals, pathogens, risk factors, environmental factors, regulations, stakeholders, economic factors, and national security issues is problematic for allowing full consideration of all aspects and parties involved. It is extremely concerning that such little time is permitted for the Task Force to accurately and scientifically complete the vastly comprehensive evaluations required in order to produce the optimal recommendations without bias. Extending the allotted time for the Task Force to thoroughly evaluate cofactors and variables would be beneficial to all including the oceans, coastal waters, Great Lakes, and the animals therein.

In addition, the Interim Report lacks clarity on two major points of the proposed “National Policy for the Stewardship of the Ocean, our Coasts, and the Great Lakes:”

1) The United National Convention on the Law of the Sea (UNCLOS) has been in effect since 1982, but the United States has never joined, despite extensive discussions with the U.N. The U.S. has found objection to many points in UNCLOS (especially Article 314) and it is unclear that these concerns have been resolved. It would seem that resolution of these objections would be necessary in order for the U.S. to join this U.N. Convention.

2) It is uncertain why the Task Force found it necessary to replace the existing Committee on Ocean Policy (COP) with the new National Ocean Council (NOC). Given that there is an existing functional group that is responsible for
addressing most of these issues, it seems counter productive to create a de novo institution, especially in consideration of the tight scheduling of the initiative.

In regard to the knowledge and skills requested by the Task Force, the veterinary profession strives to use its medical expertise to advance and protect the health of animals, people, and the environment. With our advanced formal training, combined with clinical and personal experiences, veterinarians can contribute greatly to the successful stewardship of our oceans, coastal waters, and the Great Lakes. The Interim Report states, “… there are significant gaps in our understanding of ocean ecosystem dynamics … and the complex links between these conditions and human health …” Many veterinarians are already engaged in aquatic and oceanic activities around the world. Veterinarians are the most qualified to advise on topics related to animal health, providing vital expertise on topics related to pathogens, toxins, best management practices, treatments, risk evaluations, epidemiology, intervention points, population dynamics, inter- and intra-species pressures, aquaculture, and wildlife health.

The AVMA has been a lead organization embracing and promoting the One Health concept, which, as the name implies, refers to the fact that the health of people, animals, and our environment are inseparably intertwined and interdependent. The One Health concept is grounded in the need for collaborative efforts by multiple disciplines. Similar to the One Health concept, the Interim Report is overarching in many aspects, and we hope that wildlife health will be specifically addressed among the many other topics cited within the Report.

Veterinarians with applicable expertise may be able to help satisfy the Task Force’s need for “…a diverse, interdisciplinary, ocean-literate workforce that has the appropriate skills and training…” to be able “…to improve how and what information we gather to better understand change and respond to challenges, better integrate current scientific knowledge and real-time data into decision making, …” Additionally, the veterinary profession has formal and informal education programs, promotional material, and resources desired by the Task Force in its statement, “… formal and informal education programs developed and implemented to target k-12 and beyond would create opportunities for enhanced appreciation of coastal and ocean issues …”

We applaud the efforts made by the Task Force in such a short time and are encouraged that it is seeking transparency, reducing redundancy, and employing science based decision making. The rushed timeline and the Task Force’s admitted need for additional knowledge and expertise is foreboding. Because of the potential intended and unintended consequences of the Task Force’s recommendations, precautions should be taken to ensure that a thorough and accurate science based decision making process is not sacrificed for the sake of time in the initiative’s abbreviated schedule.

Sincerely,

W. Ron DeHaven, DVM, MBA
CEO/Executive Vice President
American Veterinary Medical Association