

AVMA



American Veterinary Medical Association

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April 6, 2007

The Honorable Mike Johanns
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Johanns:

The American Veterinary Medical Association is concerned with the gap between USDA's proposal to allow additional imports from bovine spongiform encephalopathy (BSE) minimal risk countries and the USDA's position on the National Animal Identification System. The AVMA believes that implementation of the minimal risk rule can only proceed after a comprehensive and viable animal health identification system is in place. Such a system must support the measurement of disease status among livestock populations, traceability of the movements of at-risk animals, and provide for national integration of the data.

While the AVMA acknowledges the scientific approach to the assessment of BSE risks associated with the importation of certain commodities from BSE minimal risk regions from both the public and animal health perspectives, the USDA must consider the following issues.

First, the risk assessment overlooks the need for a functional National Animal Identification System. Such a system does not exist in the United States. The AVMA believes, as stated in the policy titled *Livestock Identification*, that "a permanent, dependable identification of animals is essential for tracing origin and destination of food production animals in order to protect the nation's livestock industry and public health." The inability to track imported animals, their offspring, and their contacts under the proposed provisions creates a real or perceived gap in the management of BSE or other agents.

Second, the inability to identify the source of an infected animal reduces the confidence in the U.S. animal health infrastructure and may be sufficient reason for trade partners to impose movement barriers for the species involved. The OIE Terrestrial Animal Health Code specifies that member countries have an effective system for identifying and tracking animal movements. OIE states that animal identification and animal traceability are tools for addressing animal health (including zoonoses), and food safety. These tools may significantly improve the effectiveness of management of disease outbreaks, zoning/compartimentalization, surveillance, and fair practices in trade. Presently the United States does not have an effective system.

Even though we are confident in the safety of the food supply in the United States, the confidence of the public and our trading partners may erode with the disclosure of additional BSE cases of undetermined origin. A system, as envisioned by the AVMA policy on the *National Animal Identification System* would allow for the

establishment of “databases that are accessible 24 hours a day, and 7 days a week by animal health officials.” The existence of such databases would serve to assuage the fears of the American public and the nation’s foreign trading partners.

Finally, due to the factors listed above, the risk assessment underestimates the economic impact of future cases of BSE.

The AVMA believes that implementation of the minimal risk rule can only proceed after a comprehensive and viable animal health identification and traceability system is in place. Such a system must support the measurement of disease status among livestock populations and provide for national integration of the data.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce W. Little". The signature is fluid and cursive, with a large initial "B" and a long, sweeping underline.

Bruce W. Little, DVM
Executive Vice President

BWL/LPV

Cc: Senator Tom Harkin, Chair, Agriculture, Nutrition and Forestry Committee
Representative Collin C. Peterson, Chair, House Committee on Agriculture