

# PUBLIC SUBMISSION

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**Docket:** APHIS-2008-0130

Extension of Approval of an Information Collection; National Poultry Improvement Plan

**Comment On:** APHIS-2008-0130-0001

Notice of Request for Revision and Extension of Approval of an Information Collection; National Poultry Improvement Plan

**Document:** APHIS-2008-0130-0002

Comment from Kenneth Klippen

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## Submitter Information

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**Organization:** Sparboe Farms

**Government Agency Type:** Federal

**Government Agency:** APHIS

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## General Comment

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December 19, 2008

Regulatory Analysis and Development  
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4700 River Road Unit 118  
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Reference: Docket No. APHIS-2008-0130 Notice of Request for Revision and Extension of Approval of an Information Collection; National Poultry Improvement Plan

Dear Docket Manager:

Sparboe Farms, Litchfield, MN is pleased to offer its comments on the December 19th Federal Register Notice of Request for Revision and Extension of Approval of Information Collection by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, National Poultry Improvement Plan (NPIP).

**Background On Company:** Sparboe Farms, Litchfield, MN is the fourth largest producer of fresh shell eggs and liquid, frozen and dried egg products in the nation with production complexes in Minnesota, Iowa, and Colorado. Sparboe Farms is committed to providing safe and wholesome eggs and egg products to its customers and consumers as evidenced by participating as the first egg producing company in the nation to be certified under the Safe Quality Food program through the Food Marketing Institute. Sparboe Farms is also committed to independent third party verification of its animal raising production practices as evidenced by being the first egg producing company in the nation to be certified under the USDA/AMS Process Verification Program, an ISO 9001:2000 series standard for quality management systems. This notice on the revision and extension of information collection by NPIP is of vital importance to Sparboe Farms in maintaining a healthy and viable poultry industry nationwide.

#### Role of NPIP

Raising chickens for meat or to produce eggs includes the serious responsibility of disease prevention. Many have attributed the greatest single factor that limited the early expansion of the U.S. poultry industry was the disease Bacillary White Diarrhea (BWD), caused by *Salmonella pullorum*. This disease, later called pullorum disease, was rampant in poultry and could cause upwards of 80 percent mortality in baby poultry. Poultrymen recognized the problem, but were unable to manage it until the causative organism was discovered and a diagnostic blood test was developed.

The need for evaluating the health of poultry and provide certification gave rise to the development of the NPIP. With its 48 Official State Agencies and 130 Authorized Laboratories, NPIP provides an invaluable service in assuring a continued supply of safe and wholesome poultry products from healthy poultry stock. The diseases it monitors includes U.S. Pullorum-Typhoid Clean, U.S. *Mycoplasma gallisepticum* Clean, U.S. *M. synoviae* Clean, U.S. *Salmonella enteritidis* Clean, U.S. Avian Influenza Clean.

The NPIP serves to protect the health of the U.S. poultry population through the application of new technology. The provisions of the NPIP are developed jointly and voluntarily by industry members and State and Federal officials through the establishment of health standards for the evaluation of poultry breeding stock and hatchery products and thereby provide certification of poultry and poultry products for the interstate and international shipment. Sparboe Farms has participated in the developments of the NPIP.

USDA/APHIS requires a number of information collection activities and forms to administer the NPIP, including VS Forms 1-23/1-23A, Appraisal and Indemnity Claim for Animals Destroyed or Materials Destroyed/Continuation Sheet; VS Form 9-3, Report of Sales of Hatching Eggs, Chicks, and Poults; VS Form 9-4, Summary of Breeding Flock, Table-Egg Layer Flocks, Meat-Type Chicken and Turkey Slaughter Plants Participation; VS Form 9-5, Report of Hatcheries, Dealers, and Independent Flocks, Table-Egg Producers, Meat-Type Chicken and Turkey Slaughter Plants Participating in the NPIP; VS Form 9-6, Report of *Salmonella* Isolations to NPIP Official State Agencies; VS Form 9-7, Investigation of *Salmonella* Isolations in Poultry; VS Form 9-8, Flock Inspection and Check



Testing Report; VS Form 9-9, Hatchery Inspection Form; VS Form 10-3, Request for Salmonella Serotyping; banding of sentinel birds for identification prior to flock vaccination; memorandums of understanding; recordkeeping; and printing and mailing to States, upon request, of computerized printouts of interstate sales by hatchery operators who ship large numbers of small chick orders.

Sparboe Farms supports the request by USDA/APHIS/NPIP in asking the Office of Management and Budget (OMB) to approve these information collection activities for an additional 3 years. These information collection requirements are currently approved by OMB under numbers 0579-0007 (National Poultry Improvement Plan) and 0579-0305 (Low Pathogenic Avian Influenza; Voluntary Control Program and Payment of Indemnity). After OMB approves and combines the burden for both collections under a single collection (number 0579-0007), Sparboe Farms understands the Department will retire number 0579-0305. The implied intent is simplification of the process in collecting information. Sparboe Farms supports the efforts to maximize the efficiency of the NPIP so it may continue to serve the U.S. poultry industry.

### The Vital Importance of Avian Influenza Surveillance

Avian influenza (AI), or "bird flu," has created significant attention within the World Health Organization because the virus infects chickens, turkeys, and game birds, and the potential exists for it mutating into a human public health risk. AI virus strains are classified into two groups by pathogenicity in domestic chickens. Highly pathogenic (HPAI) virus strains are extremely infectious, often fatal to domestic poultry, and can spread rapidly from flock-to-flock. Low pathogenic (LPAI) virus strains occur naturally in wild birds without causing illness, but some are capable of mutating into HPAI viruses. APHIS works closely with States and the poultry industry to prevent AI from becoming established in the U.S. poultry population.

The NPIP's H5/H7 LPAI Monitored Program requires the testing of broilers, commercial layers, and meat-type turkeys. Screening tests are performed in 135 NPIP authorized laboratories throughout the country. APHIS operates secure data reporting systems that incorporate NPIP testing data in national AI surveillance. This information helps to assure international partners that the U.S. AI surveillance system is working to verify the safety of our poultry exports. Recently NPIP provided this service to egg-type chickens (261 flocks with 3.3 million birds), meat-type chickens (4991 flocks with 76 million birds), turkeys (648 flocks with 4.9 million birds) and waterfowl, exhibition poultry and game birds (3,939 flocks with more than 1 million birds).

A major outbreak of Highly Pathogenic Avian Influenza (HPAI) would be costly to the poultry industry, consumers and taxpayers. Eradication of an HPAI outbreak that occurred during 1983-84 in the Northeastern U.S. resulted in the destruction of more than 17 million birds at a cost of nearly \$65 million. The resultant price increase for eggs at retail rose by more than 30%. Once introduced, the disease can be spread from bird to bird by direct contact. HPAI viruses can also be spread by manure, equipment, vehicles, egg flats, crates, and people whose clothing or shoes have come in contact with the virus. HPAI viruses can remain viable at moderate temperatures for long periods in the environment and can survive indefinitely in frozen material. One gram of contaminated manure can contain enough virus to infect 1 million birds.

It is evident to everyone in the poultry industry and to all federal agencies responsible for animal health as well as human health, that Avian Influenza is a serious poultry disease that mandates monitoring and instituting control measures. Among the federal agencies conducting monitoring and surveillance testing for this disease, the NPIP serves a vital role in safeguarding the health of the nation's poultry flock.

We appreciate this opportunity to support the request by USDA/APHIS/NPIP in asking the Office of Management and Budget (OMB) to approve these information collection activities for an additional 3 years.

Sincerely,

Kenneth L. Klippen  
Executive Director of Government Relations  
And Animal Welfare  
Sparboe Farms