

May 14, 2012



TEXAS CATTLE FEEDERS ASSOCIATION

5501 I-40 W.
Amarillo, TX 79106-4617
(806) 358-3681
FAX (806) 352-6026
info@tcfa.org
www.tcfa.org

James M. Peters
Chairman

Walt Olson
Chairman-Elect

Jason Hitch
Vice Chairman

Ross Wilson
President & CEO

DIRECTORS

Ed Attebury
Kevin Bunch
Kevin H. Buse
Paul Colman
Mike Engler
Russell Goble
Chris Hitch
Shelby W. Horn
Bo Kizziar
Jim Lovell
Rex McCloy
Dal Reid
Sid Sawyer
Pete A. Scarmardo
Patrick Schwab
Mike Thoren
Monty Wheeler

USDA-APHIS-PPD
Regulatory Analysis and Development
Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

RE: Docket No. APHIS-2008-0010

Texas Cattle Feeders Association (TCFA) is an agricultural trade association representing 200 beef cattle feedyards in Texas, Oklahoma and New Mexico and approximately 5,000 cattle feeders across the United States. TCFA members feed and market around 6.5 million head of cattle annually, which equates to about 30% of the nation's fed beef. Our industry is heavily reliant on international trade, whether it be the export of U.S. beef around the world or the importation of stocker and feeder cattle from Canada and Mexico, a traditional source of cattle for our members in South Texas and New Mexico given their proximity to the border and the lack of a comparable Mexican cattle feeding industry.

TCFA applauds USDA-APHIS for promulgating a comprehensive rule that establishes science-based import standards relating to *bovine spongiform encephalopathy* (BSE) risk for live bovine and bovine products. TCFA believes that harmonization and equivalency must be achieved in all animal health regulations between the U.S. and our trading partners. As a matter of principle, science and not politics must be the basis for such standards. We cannot expect other countries to set objective safety standards for U.S. beef, based on OIE guidelines, when the U.S. does not have an objective, science-based standard in place for beef from other countries.

The U.S. cattle industry and USDA-APHIS have worked diligently to establish and support the enforcement of firewalls to prevent the introduction, amplification and spread of BSE in North America. Over the last 25 years, scientists have generated a truly impressive collective knowledge detailing the causative agent, transmission, pathogenesis and epidemiology of the disease. Moreover, the accumulated research and experience of countries around the world have led to identification and enactment of the most effective risk-management strategies to halt the amplification of the causative agent of BSE, thereby protecting both human and animal health. This proposed rule is a reflection of the current (and considerable) understanding of BSE and is consistent with OIE guidelines.

In addition, this rule, once in place, will demonstrate our nation's commitment to basing trade decisions on internationally-recognized, science-based standards and will give our trade negotiators additional credibility and leverage to persuade other nations to remove their non-tariff trade barriers and adopt science-based BSE policies. When nations base their decisions on sound science, it will level the playing field in the global marketplace, and we are confident more markets will be expanded or opened to U.S. beef.

TCFA appreciates the opportunity to review and comment on this important rule, and we advocate for its quick implementation. If you have any questions or concerns, please contact me or Josh Winegarner, TCFA director of government relations, at (806) 358-3681 or josh@tcfa.org.

Sincerely,

Ross Wilson
President & CEO