Docket No. APHIS-2014-0026, Regulatory Analysis and Development, PPD, APHIS, Station 3A-03.8, 4700 River Road Unit 118, Riverdale, MD 20737-1238.

September 2, 2014

National Pork Board Comments Regarding Docket No. APHIS-2014-0026: Notice of Request for Extension of Approval of an Information Collection; Importation of Used Farm Equipment from Regions Affected with Foot-and-Mouth Disease

These comments are submitted on behalf of the National Pork Board. The National Pork Board was established by an act of Congress in 1985 and is responsible for the collection, distribution, and program accountability for the money generated by the Pork Checkoff. A board led by 15 pork producers, appointed by the USDA Secretary, creates programs in the areas of promotion, research and consumer information. These programs support producers by providing them with information on many areas including swine health and pork safety.

The incursion of Foot and Mouth Disease (FMD), Classical Swine Fever (CSF), African Swine Fever (ASF) and Swine Vesicular Disease (SVD) into the United States would result in the immediate loss of export markets for live swine, pork and pork products. In a study funded by Pork Checkoff, a Center for Agricultural and Rural Development Food and Agricultural Policy Research Institute model estimated revenue losses to the pork and beef industries resulting from the introduction of FMD in the U.S. would average \$12.9 billion per year. Total cumulative revenue losses across the commodities modeled over a 10-year period was \$199.9 billion including \$57 billion for pork, \$71.2 billion for beef, \$0.98 billion for poultry, \$44 billion for corn, \$24.9 billion for soybeans and \$1.8 billion for wheat.

The exclusion of Foot-and-Mouth Disease or other trade-limiting foreign animal diseases from the United States is the first line of defense for protecting animal agriculture. Part 94, Sec. 94.1(c) is essential to reducing the risk of disease introduction through fomite pathways by prohibiting the importation of used farm equipment into the United States from regions where APHIS considers FMD or rinderpest to exist unless the equipment has been steam-cleaned prior to export to the United States so that it is free of exposed dirt and other particulate matter.

The collection of information, especially the certificates outlined in Part 94, Sec. 94.1(c), is essential to aid USDA APHIS VS in verifying that the proper mitigations have occurred to reduce the risk of FMD entry into the United States. This regulation, and the information collected, combined with the role that USDA APHIS VS, USDA PPQ and DHS CBP undertake in protecting animal agriculture from introduction of foreign disease agents, is essential for protecting the U.S. pork industry.

The National Pork Board appreciates the opportunity to provide input on this important matter. The Pork Checkoff is committed to the continued approach of working cooperatively with USDA APHIS on activities that help protect the pork industry from an incursion of a foreign animal disease of swine.



Sincerely,

Dr. Patrick Webb

Director, Swine Health Programs

National Pork Board