



September 29, 2014

Docket Number APHIS 2014-0032-0001
Regulatory Analysis and Development
PPD, APHIS Station 3A-03.8
4700 River Road, Unit 118
Riverdale, Maryland 20737-1238

RE: Docket Number APHIS-2014-0032: Importation of Beef From a Region in Argentina

The National Cattlemen's Beef Association (NCBA), the American Veterinary Medical Association (AVMA), the American Association of Bovine Practitioners (AABP), and the Academy of Veterinary Consultants (AVC) represent cattlemen/women and veterinarians, respectively, in the United States. A shared viewpoint among the members of these organizations is a strong dedication to ensuring and maintaining the health and well-being of the cattle under their care as well as the safety of the beef produced in the United States.

While NCBA, AVMA, AABP and AVC appreciate the efforts of the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) to expand the export markets for fresh beef based on internationally sound science, we remain vigilant concerning any possible risk for the introduction of Foot-and-Mouth disease (FMD) into the naïve U. S. cattle herd. Overwhelming scientific evidence, including over a hundred years of real world experience, shows that FMD is a highly contagious and economically devastating animal disease. It has been estimated that countries which are free from FMD and suffer an FMD outbreak may lose between 0.3% to 0.6% of their gross domestic product.¹ Given the probable economic significance of the entry of FMD into this country and the possible devastating effects of FMD to the U. S. livestock industry, we request a 120 day extension to the current comment period in order to apply the necessary due diligence in our review of all primary and supporting documents concerning APHIS 2014-0032-0001, to include the *USDA Risk Analysis: Foot-and-Mouth Disease Risk from Importation of Fresh (Chilled or Frozen), Matured, Deboned Beef from Northern Argentina into the United States*.

Currently, there are 68 documents posted to the docket for review in addition to the APHIS risk analysis, economic impact analysis and environmental assessment for the proposed rule, *Importation of Fresh Beef from Northern Argentina*. Our requested extension period of 120 days is necessary for the comprehensive review of these materials as well as any additional background information requested from supporting agencies. Additionally, the translation of several materials submitted to the docket in Spanish will be necessary prior to our review. In light of recent questions from Congress to the Government Accountability Office regarding the transparency and management controls for the APHIS site review process for regionalization, we

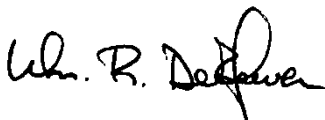
¹ Rushton, et al., OIE Global Foot and Mouth Disease Control Strategy Supporting Document No 1, Royal Veterinary College, University of London, pg. 18.

feel even more compelled to carefully review and request all pertinent documentation associated with this proposed rule. Thank you for your consideration of our request for a 120 day extension to the comment period. For further clarification or questions, please contact Dr. Kathy Simmons, Chief Veterinarian for NCBA, at 202-347-0228 or ksimmons@beef.org.

Sincerely,

Handwritten signature of Bob McCan in black ink.

Bob McCan
President, National Cattlemen's Beef Association

Handwritten signature of W. Ron DeHaven in black ink.

W. Ron DeHaven, DVM, MBA
Chief Executive Officer, American Veterinary Medical Association

Handwritten signature of M. Gatz Riddell, Jr. in black ink.

M. Gatz Riddell, Jr., DVM
Executive Vice President, American Association of Bovine Practitioners

Handwritten signature of Daniel R. Goehl in black ink.

Daniel R. Goehl, DVM
President, Academy of Veterinary Consultants