

February 20, 2020

The Honorable Sonny Perdue
Secretary of Agriculture
United States Department of Agriculture
Room 200-A Jamie Whitten Building
14th Street & Independence Ave., S.W.
Washington, D.C. 20250



Dear Secretary Perdue,

We appreciate the partnership we have with the United States Department of Agriculture (USDA) in working to keep the United States free of African Swine Fever (ASF). The Animal and Plant Health Inspection Service (APHIS) Veterinary Services staff have done tremendous work on prevention, early identification, preparedness and response to ASF. While these efforts are laudable, pork producers across the nation remain deeply concerned about U.S. vulnerability to this terrible disease. Accordingly, we are writing to request USDA to take additional steps to help mitigate against introduction of this disease into the United States.

APHIS VS and PPQ personnel, as well as personnel from FDA's Center for Veterinary Medicine, have been involved in a Feed Risk Task Force organized by feed and pork industry organizations. This task force has also included representatives from other food animal groups. The Feed Risk Task Force objective is: "There is agreement that there is risk of introduction of pathogens into and within the U.S. via imported feed products. The Task Force will evaluate the risk and help decide what industry, USDA and/or FDA actions need to be taken to protect the U.S. pork industry from that risk. Actions should be achievable, based on science that will minimize trade disruptions."

The task force has reached a stalemate due to lack of validated sampling and testing protocols for feed ingredients. However, we continue to have heightened concern over the risk of ASF contamination of imported feed ingredients. While we are confident in the safety of domestic soy products this concern is especially true for organic soy products imported from ASF positive countries because laboratory studies have demonstrated their potential to maintain infective virus. The feed risk task force has identified the Animal Health Protection Act as the regulatory vehicle that could be utilized to limit imports of high-risk feed ingredients.

The pork and feed industry participants have taken steps to limit the risk from imported vitamin and amino acids through holding times, but that is an impractical mitigation for soy products, especially organic soy products, due to their ability to maintain virus for extended periods of time. For that reason, we are asking you to utilize your authority under the Animal Health Protection Act to restrict the imports of organic soy products for animal feeds from all ASF-positive countries and to consider if action should be taken on all soy products.

During the work we have done with APHIS over the last years on ASF and other Foreign Animal Diseases (FAD), several other areas of concern have come to light. The ASF functional exercise demonstrated that the Emergency Management Response System (EMRS) is not able to be quickly populated, nor are premises currently in the EMRS database able to be easily updated, thus providing potential challenges to real time permitting during an outbreak situation. Updating EMRS will require additional resources and we urge you to work with APHIS to begin an update as quickly as possible.

The pork industry is extremely grateful for APHIS' work with the National Animal Health Laboratory Network to expand the sample types that can be tested, as well as the number of laboratories that are able to test for ASF. However, the exercise has demonstrated that insufficient laboratory capacity remains a serious shortcoming during an outbreak of ASF or any other FAD. Addressing this gap in our preparedness capability can make the difference between a successful control and eradication program or its failure.

Again, we appreciate the work by USDA to date to mitigate the impacts of ASF on the U.S. pork industry and we look forward to continued cooperation in the battle to keep our nation free of this deadly disease.

Sincerely,

Arkansas Pork Producers Association
California Pork Producers Association
Colorado Pork Producers Council
Hawaii Pork Producers
Idaho Pork Producers Association
Illinois Pork Producers Association
Indiana Pork Producers Association
Iowa Pork Producers Association
Kansas Pork Association
Kentucky Pork Producers Association
Louisiana Pork Producers Association
Michigan Pork Producers Association
Minnesota Pork Producers Association
Mississippi Pork Producers Association
Missouri Pork Association
Montana Pork Producers Council
National Pork Producers Council
Nebraska Pork Producers Association, Inc.
New York Pork Producers Co-op
North Carolina Pork Council
North Dakota Pork Council
Ohio Pork Council
Oklahoma Pork Council
Oregon Pork Producers
Pennsylvania Pork Producers Council
South Dakota Pork Producers Council
Tennessee Pork Producers Association
Texas Pork Producers Association
Utah Pork Producers
Virginia Pork Council, Inc.
Wisconsin Pork Association

The Global Voice of the U.S. Pork Industry

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