



RE: Docket No. APHIS-2009-0006

Thank you for allowing the North Dakota Stockmen's Association (NDSA) to comment on the concept paper entitled "A New Direction for the Bovine Brucellosis Program."

Established in 1929, the NDSA represents more than 2,800 beef producers in North Dakota. Members met recently at the organization's annual convention and adopted two policies – Disease Eradication and Disease Surveillance – that are applicable to this discussion. The text of each of those follows:

DISEASE ERADICATION - 9

WHEREAS, the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (USDA APHIS) has implied there is a lack of federal funding to continue the national tuberculosis (TB) and brucellosis eradication programs that have been successful for several decades; and

WHEREAS, the continued prevalence of TB in the United States in both domestic livestock and wildlife poses a significant public health and animal health risk.

THEREFORE BE IT RESOLVED, the NDSA requests that USDA APHIS continue to fund an eradication and indemnification program for TB and brucellosis.

BE IT FURTHER RESOLVED, that industry and state animal health officials fully participate in the structure of any new program or changes to the current program and that any program changes allow states to retain the authority to implement testing requirements to protect their livestock and wildlife populations.

DISEASE SURVEILLANCE – 9

WHEREAS, an awareness, surveillance and responsive communication program is essential as a first-line of defense for all foreign animal diseases and brucellosis and tuberculosis.

THEREFORE BE IT RESOLVED, the NDSA strongly urges that animal disease surveillance and responsiveness should receive the highest priority by both federal and state animal health agencies and personnel. Emergency procedures for assuring maximum cooperation between federal and state agencies should be clearly and expeditiously established.

We are disappointed with the statements included on page 6: “The public perceives whole-herd depopulation as a less acceptable approach for disease control. Changing social values concerning the care and well-being of livestock, the recognition of the environmental consequences of animal disposal and the value of proteins derived from livestock also drive the need to develop new approaches to disease control.” We assert that decisions regarding disease control and eradication must be made based on science, not on emotion or what some describe as “changing social values.” Certainly, livestock producers and animal health professionals do not make the decision to depopulate a herd on a whim and choose this extreme and unfortunate option only when absolutely necessary to control disease and protect other animals. Suggesting that public sentiment should drive these program decisions is inappropriate.

We appreciated the recognition that there is a need for multi-agency coordination and collaboration to combat this disease and others. The lack of coordination among federal agencies, federal and state agencies, and animal health, wildlife and human health agencies has been a frustration in many U.S. cattle and wildlife health issues over the years. We contend that the United States will never be completely free of brucellosis until associated agencies dramatically improve their coordination and work to eliminate disease reservoirs.

Thanks again for the opportunity to comment on this important issue.

Sincerely,
Julie Ellingson
Executive Vice President
North Dakota Stockmen’s Association