
To whom it may concern:

The National Milk Producers Federation (NMPF) welcomes the opportunity to comment on the United States Department of Agriculture Animal and Plant Health Inspection Service’s (USDA-APHIS) draft Framework for Implementing and Maintaining the Arrangement between the Canadian Food Inspection Agency and the United States Department of Agriculture for the Recognition of Foreign Animal Disease Control and Eradication Zones (Draft Framework). The National Milk Producers Federation, based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. NMPF’s member cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 32,000 dairy producers on Capitol Hill and with government agencies. Our members’ productivity and economic security are critical components in maintaining a safe, abundant food supply for an ever-increasing world population.

NMPF is a proponent of a well-designed trade policy and utilizing science-based standards to facilitate international trade. We believe that every effort should be made to develop an integrated domestic-foreign trade policy which encourages reciprocity, elimination of unfair trade restrictions and a movement toward free markets. Over the past decade, the U.S. dairy industry has experienced over 20 percent annual growth in exports now totaling more than 16 percent of domestic milk production and $7.63 billion annually (June 2013 – May 2014). In that time the U.S. dairy industry has become a global leader and is the market leader in dairy exports for such products as cheese, skim milk powder, whey products, and lactose.

Canada is the second-largest export market for U.S. dairy products valued at $800 million annually (June 2013 – May 2014). A highly contagious foreign animal disease (HC-FAD) outbreak (such as foot and mouth disease) in the U.S. or Canada could have a catastrophic economic effect on the U.S. dairy industry. NMPF applauds the forward thinking efforts of USDA working with the Canadian Food Inspection Agency to prepare for an HC-FAD outbreak and supports the Draft Framework as an effective tool to help minimize trade disruptions between our countries in the event of an HC-FAD outbreak.
The Draft Framework provides an effective operational plan for the U.S. and Canada to recognize each other's decisions to control a HC-FAD outbreak through zoning of infected- and disease-free regions. Both the U.S. and Canada have HC-FAD outbreak response plans that are based on internationally accepted zoning principles of the World Animal Health Association (OIE). NMPF supports the continued use of scientific approaches of the OIE for HC-FAD outbreaks for both disease containment and eradication, and for normalizing international trade.

The U.S. and Canada each have plans for an HC-FAD outbreak which establish a control area(s) that consists of a central infected zone surrounded by one or more additional zones. The infected zone is the focus of disease eradication efforts, while the area(s) of control is subject to surveillance for the HC-FAD agent combined with movement restrictions on animals and other commodities that could transmit the agent. The Draft Framework allows the affected country to modify or redefine the boundaries of an area of control during the course of an outbreak following specified procedures.

This zoning arrangement outlined in the Draft Framework will facilitate continued trade between disease-free areas of the U.S. and Canada while safeguarding animal health in both countries. NMPF appreciates that the Draft Framework also establishes a structure for maintaining the arrangement over time and strategies for engaging governmental and non-governmental stakeholders (like the U.S. dairy industry) in any actions taken under the arrangement, including planning, preparedness, and response.

NMPF also encourages USDA to use this Draft Framework as a template to work with other countries that are important export markets for the U.S. dairy industry. In addition to Canada, the top export markets for U.S. dairy products are Mexico, China, Philippines, Indonesia, South Korea, and Japan representing approximately 60 percent of the total value of exported dairy products.

In conclusion, NMPF supports the Draft Framework based on internationally accepted zoning principles of the OIE as an effective tool to help minimize trade disruptions between the U.S. and Canada in the event of an HC-FAD outbreak. We welcome the opportunity to meet with you to discuss how we can work together to meet our mutual goals. If you wish to discuss any of these comments in greater detail, please contact me at (703)-243-6111 or jonker@nmpf.org.

Sincerely,

Jamie Jonker, Ph.D.
Vice President, Sustainability & Scientific Affairs