

June 15, 2010



**TEXAS
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FEEDERS
ASSOCIATION**

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Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118,
Riverdale, MD 20737-1238

Docket No. APHIS—2009—0034

**Re: Changes in Disease Status of the Brazilian State of Santa Catarina with
Regard to Certain Ruminant and Swine Disease**

Dear Dr. Clifford:

Texas Cattle Feeders Association (TCFA) appreciates the opportunity to comment on this proposed rule and the effort that USDA has put into evaluating the Foot-and-Mouth Disease (FMD) risk status of the Brazilian state of Santa Catarina.

TCFA represents cattle feeders and feedyards in Texas, New Mexico and Oklahoma—an area that produces and markets approximately 30% of the nation's fed beef or 6.5 million head of fed cattle annually. TCFA represents one of the nation's largest beef producing regions, and cattle production plays a significant role in our state and national economies, accounting for \$50 billion in U.S. farm-gate receipts – 20% of all on-farm income.

TCFA supports free and fair trade as long as it is based on rigorous, scientific analysis and proven administrative procedures to ensure the health and safety of the U.S. cattle herd. As you know well, FMD is the single largest animal health threat to the livelihood of U.S. cattle producers, and a domestic outbreak would devastate the U.S. cattle and beef industries. However, there was no discussion or explanation in the proposed rule regarding the cost of a domestic FMD outbreak to U.S. cattle and beef producers or consumers.

TCFA also is skeptical of Santa Catarina's ability to implement and enforce its protective barriers effectively on a long-term basis. While there is some level of comfort in the degree of separation provided by federal, state and local animal disease monitoring and control programs, as well as the noted geographical and administrative barriers, these protective, administrative measures have been in place a short period of time and are relatively unproven. This is especially troublesome given that regionalization undoubtedly will create a two-tiered beef market in Brazil, with cattle prices in Santa Catarina exceeding those of the surrounding states. These economic factors will no doubt incentivize entities in Santa Catarina to import contraband cattle from other Brazilian states which may have FMD.

Because of the uncertainty regarding the effectiveness of Santa Catarina's protective, administrative barriers to prevent the reintroduction of FMD and the significant, potential threat to the U.S. cattle herd, TCFA opposes this proposed rule. More time is needed for Santa Catarina to prove that it can implement an effective FMD prevention program before the U.S. imports live animals or fresh meat from the Brazilian state.

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In addition, TCFA is extremely disappointed that the U.S. government is proposing to provide Brazil with access to U.S. markets even though Brazil continues to ban the importation of U.S. beef and live cattle because of BSE. TCFA is likewise frustrated that the U.S. government has not taken a more proactive approach in resolving this completely unfounded, non-tariff trade barrier against U.S. beef and cattle producers.

Thank you for considering our concerns.

Sincerely,

A handwritten signature in black ink that reads "Ross Wilson". The signature is written in a cursive, flowing style.

Ross Wilson
President & CEO