REPORT OF THE COMMITTEE ON IMPORT-EXPORT
Chair: Mark Engle, TN
Vice Chair: Robert Blomme, IA

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The Committee met on 10/19/2014 at the Sheraton Hotel in Kansas City, Missouri, from 12:30 PM to 5:00 PM. There were 22 members and 17 guests present. Dr. Blomme called the Committee to order and welcomed participants. The committee purpose, membership, meeting, and resolution guidelines were reviewed. There were no previous resolutions.

Time-Specific Paper Title.
No time specific papers were presented.

Presentations & Reports

NIES Import of Animal Products and By-Products
Tracye R (Butler) Hernandez-Bynum USDA APHIS VS NIES

Dr. Butler provided an overview of NIES activities related to import of animal products. A detailed report is included below

Products Trade Negotiations Staff FY 2014 Activities
Tracye R (Butler) Hernandez-Bynum USDA APHIS VS NIES

Dr. Butler provided an overview of staff activities related to exports of animal products. A detailed report is included below

Import-Export Update FY 2014
Joyce Bowling-Heyward, USDA APHIS VS NIES

Dr. Bowling-Heyward provided an overview of FY 2014 export and import activities including employee training for the Veterinary Export Health Certification System (VEHCS), semen and embryo facilities inspection, and certificate endorsement. Other focused activities included talks with Canada and Mexico on the acceptance of electronic signatures, expanding exports for live cattle, providing technical expertise to stakeholders, technical support for visiting foreign veterinarians and responding to trade disruptions in live swine for PEDv. Dr. Bowling-Heyward provided overviewed VEHCS system which is designed to be a standard globally accepted export health certificate system with a database for analytics and reporting. Recent updates to the system include digital signatures, external web viewer and a universal health certificate in English. The next step is to work towards WTO notification to alert trading partners, expand acceptance of the digital signature with partner countries, development of a universal Spanish certificate and full implementation of the system across the United States.
Fiscal year 2014 import activities included approval of several privately owned equine quarantine facilities, renovation of a USDA bird quarantine facility in San Ysidro and construction of import inspection facilities at various Mexican border port locations. Staff continue to work with Mexico on joint tuberculosis strategic planning activities. Improvements are being made to the import tracking system to improve collection and trace back of animal identification. Staff participated in Northern Border Port Conference, Air and Sea Port Conference, and Animal Import Center Conference to review policies and improve consistency at import and port facilities. Import staff continue to issue important transit permits, provide technical expertise, negotiate import protocols, provide training at the field level and responding to questions from importers and foreign governments. Animal import numbers were provided for porcine, ovine, bison, equine, avian and bovine and swine semen in FY 2014.

**Vision and Science: National Import Export Services (NIES)**
Joyce Bowling-Heyward, USDA APHIS VS NIES

Dr. Bowling-Heyward provided an overview of the recent reorganization of the National Import Export Services which included the vision and mission statements, key services of the agency, the organizational chart, and fiscal year 2014 priorities related to operations, customer service, IT strategies and workplace culture.

**Entry Assessment for Exotic Viral Pathogens of Swine**
Kelly Rhodes, USDA APHIS VS NIES

Dr. Rhodes provided an overview the entry assessment for exotic viral pathogens of swine. She reviewed the objectives of the assessment which were to identify and describe pathways by which exotic viral pathogens of swine may enter the United States and estimate the likelihood that each identified pathway may introduce exotic pathogens of swine into the United States. The assessment included hazard identification, entry assessment methods, risk estimation terms, uncertainty terms, assumptions, pathway groups and feed ingredient origins. The assessment used Foot and Mouth Disease, Pseudorabies and Classical Swine Fever as representative viruses and identified negligible risk pathways for animal tissues or fluids, articles, animal feeds, animal tissues and fluids and other articles, animal feed and human food. The assessment also identified non-negligible risk pathways for animal feeding and human food. The next steps for this process is to look at pathways with non-negligible likelihood of introduction and estimate the likelihood of exposure, and evaluate the consequences. In regards to pathways where risk introduction and overall exposure are non-negligible the goal would be to identify potential mitigation measures.

**Importation of Fetal Bovine Serum**
Percy W. Hawkes, Independent Consultant for Biowest

Dr. Hawkes provided an overview of a request that USDA APHIS VS update and publish a proposed rule for importing fetal bovine serum. The overview included an overview of the world supply for fetal bovine serum, identified suppliers and their capacity, and international trade statistics. A background was provided on the USDA and industry efforts to update FBS import requirements. Dr. Hawkes also reviewed five points for consideration when updating importation requirements. Those five points are included in a resolution submitted by Dr. Hawkes for committee consideration.

**Committee Business:**

Three proposed resolutions relating to African swine fever, fetal bovine serum, and bluetongue were submitted to the committee for consideration. The committee reviewed and discussed each proposed resolution and the following resolutions were passed:

**RESOLUTION: IMPORTATION OF FETAL BOVINE SERUM**
PASSED 5 Aye / 4 Ney

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) to publish the proposed rule authorizing the use of gamma irradiation for the importation of commercial shipments of
Fetal Bovine Serum (FBS) from countries and/or regions that have restrictions because of pathogens that can be eliminated by gamma irradiation, thus helping assure a reliable, affordable, safe and continuous supply of pathogen-free FBS to research laboratories and biologics manufacturers.

The Committee also urges USDA, APHIS, VS to work with the FBS industry to include the following options when updating FBS import requirements: 1) Irradiation outside the US with proper USDA oversight, 2) Importation of irradiated FBS from FMD free countries with vaccination, 3) Processing of FBS in 3rd countries with proper USDA oversight, 4) Safety testing of FBS using internationally accepted tests other than animal inoculation, and 5) Define penalties for fraud and misrepresentation.

RESOLUTION: Need for APHIS Risk Assessment and Rulemaking prior to Allowing Imports from Countries with African Swine Fever
PASSED: Unanimously

The United States Animal Health Association requests that USDA APHIS conduct a risk assessment for any country that has ASF in either the domestic herd or feral swine that currently imports or seeks to import swine, porcine genetic material, pork or pork products into the U.S. APHIS shall use such a risk assessment as the basis for independent rulemaking, not amendment of current regulations that pertain to other FADs, which includes a proposed rule and a comment period. Only after such rulemaking and consideration of comments should imports be considered. If during rulemaking APHIS recommends development of an ASF Free Compartment within such a country, it is requested that producers in such a compartment be required to follow and document the same biosecurity practices as would U.S. producers in the case of an ASF outbreak. These biosecurity practices are outlined in the Secure Pork Supply (http://www.securepork.org/plan-components.php).

RESOLUTION: Bluetounge, National Strategy for Animal Exports
PASSED: Unanimously

Given the historic and ongoing negative impact of endemic bluetongue virus infection to the export of ruminant livestock from the United States, the United States Animal Health Association (USAHA) requests that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), develop, educate and facilitate a national strategy for animal exports, possibly through regionalization supported by a national surveillance program as prescribed by OIE (Terrestrial Animal Health Code chapter 8.3).

Addendums to the committee report should be in the following order:

- Subcommittee Reports
- Time-Specific Papers
- Other Presentations/Papers
- Supplemental information

OTHER NOTES:
Presented by Tracye (Butler) Hernandez-Bynum

Import Animal Products

National Import Export Services (NIES) continues its mission to facilitate safe international trade of animal products and by-products, regulate the importation of animal products and by-products, prevent the introduction of dangerous and costly pests and diseases, promulgate import regulations and policies, collaborate with other government agencies and issue import permits. During FY14, NIES issued a total of 4725 permits for animal products, as well as Organisms and Vectors.

NIES is continuing its work on streamlining animal product import regulations provided in Title 9, Code of Federal Regulations, Parts 94, 95 and 96. This streamlining process will reorganize, clarify and update the regulations for easier understanding. It will also provide for a notice-based process and risk-based criteria for acceptance of new disease mitigation procedures. These new mitigation procedures will be posted on our website and the mitigation requirements will be less prescriptive.

Bovine Spongiform Encephalopathy (BSE) Comprehensive Rule

The BSE Comprehensive Rule was finalized December 2013; and became effective March 4, 2014. It established BSE-related import provisions more closely aligned with OIE guidelines including country risk status classifications (Negligible, Controlled, and Undetermined). It also allows flexibility in the BSE risk classification process allowing APHIS to concur with OIE BSE determinations after APHIS has evaluated a country or region's BSE status. All countries will be considered undetermined risk until such time that APHIS determines them to be Negligible or Controlled Risk. Recognition will be based on the following criteria;

1. APHIS concurrence with OIE classification, OR
2. APHIS evaluation, upon request, of countries not classified by the OIE

The BSE Comprehensive Rule eliminates the need for formal rulemaking for each individual country/region. The importation of bovines and bovine products from BSE minimal-risk regions (Canada) and for boneless beef from Japan have been removed from the Federal Register and incorporated into the final rule. It allows the importation of additional bovine and bovine products into the United States from the 3 risk category countries under certain conditions. The bovine products include:

1. Hides/skins and Gelatin/Collagen from hides/skins
2. Deboned meat (excluding MSM) from cattle ≤30 months of age provided the animals pass ante- and post-mortem inspection, specified risk materials (SRM) are removed, and they were not subjected to an air injected stunning process or pithing
3. Protein-free tallow and derivatives made from this tallow
4. Dicalcium phosphate with no trace of protein or fat
5. Blood/blood by-products derived from cattle not subjected to an air injected stunning process or pithing, and collected in a manner that avoids contamination

Ruminant meat-and-bone meal (MBM) and greaves from controlled and undetermined risk countries will remain as prohibited materials.

APHIS Concurs with OIE Designations

On October 1, 2014, APHIS published it's concurrence with OIE's BSE risk designations for the following countries:
(1) Negligible risk for BSE: Austria, Belgium, Brazil, Colombia, Israel, Italy, Japan, the Netherlands, Singapore, and Slovenia.
(2) Controlled risk for BSE: Bulgaria, Costa Rica, Croatia, Nicaragua and Taiwan

Transmissible Spongiform Encephalopathies (TSE) Rule

OIE Code does not address BSE risk for ovines/caprines. Therefore, a separate rule is currently under development that will address import requirements for TSEs and allow importation of sheep and goats, their embryos, and their products/by products from countries classified as Negligible or Controlled Risk for BSE under certain conditions. This rule is currently undergoing Departmental clearance. The importation of sheep and goat material will continue to be regulated under the BSE conditions that existed prior to implementation of the new BSE Comprehensive rule until the TSE rule is finalized.

Regionalization Update

Argentina: Patagonia South and Patagonia North B recognized as free of Rinderpest and foot-and-mouth disease (FMD) with special restrictions – chilled or frozen beef (September 2, 2014)

Mexico

Proposed rule to define a low-risk classical swine fever (CSF) region in Mexico from which fresh pork and pork products would be eligible for importation under certain conditions (published July 29, 2014).
The Animal Products Trade Negotiations Staff (or Export Animal Products Staff – EAP) provides leadership for all Veterinary Services (VS) export activities and provides a unified, seamless approach to developing and implementing export policies across the organization. VS employees in this subunit are export specialists and enable VS to meet our stakeholders’ expectations of high quality and timely service.

The EAP conducts activities that foster the export of animal products, including development of policy pertaining to export, clarification of the requirements of other countries, and management of the inspection and approval of facilities that to export certain commodities to certain countries. In order to assure consistent policy and compliance with the requirements of other countries, EAP works in collaboration with other agencies, such as USDA Food Safety Inspection Service, the Food and Drug Administration, NOAA’s Seafood Inspection Program and National Marine Fisheries Service (NMFS) Fishmeal Certification Program, among others. EAP also works with the USDA Agricultural Marketing Service for the certification of dairy products and shell eggs. EAP collaborates with the Trade Support Team, Foreign Agricultural Service, the Office of the U.S. Trade Representative, and with foreign officials, providing expertise and technical support during negotiations concerning animal disease requirements. Finally, EAP negotiates directly with counterparts in foreign governments to seek access, as well as OIE-consistent and favorable conditions, for diverse animal product commodities intended for use in animals, for further processing, or for human consumption.

The EAP has worked diligently since the OIE’s reclassification of the U.S. BSE status from “controlled risk” to “negligible risk” to re-open markets for bovine origin products. Removal of all BSE-related restrictions on U.S. origin animal products is one of the top ten goals for APHIS, and the major goal for Veterinary Services.

The EAP has also worked diligently to retain market access in Canada for aquatic animal products intended for human consumption, bait use, research and education. The bulk of this product falls into food service, retail use and further processing. To facilitate exports, EAP is working with the Live Animals Staff to develop registration programs that would allow the movement of shipments without lot-specific health certificates. EAP is currently involved in another major initiative with Canada precipitated by the changes in import policy for pet foods being proposed by the Canadian Food Inspection Agency (CFIA).

Endorsement of Certificates and Facility Inspections:

APHIS Veterinary Services field offices (District Offices and Service Centers) support the export of U.S. origin animal products through the endorsement of export certificates and inspection of manufacturing, processing, or handling facilities. Unfortunately, there is no longer a reliable way to determine the actual number and/or types of export certificates endorsed for animal products. Through June 2014, one set of data reported 8,241 export certificates for animal products. Extrapolating through the end of FY 2014, the estimated number of product certificates issued by VS field offices would be approximately 10,250.

Other agencies also certify products such as dairy and shell eggs (USDA Agricultural Marketing Service); meat and meat products and processed egg products (USDA Food Safety and Inspection Service); and fish products (National Oceanic and Atmospheric Administration). While EAP is involved in negotiating the animal health requirements for these commodities, Veterinary Services does not have information on the numbers of product certificates issued by these agencies.

Veterinary Services also inspects manufacturing facilities to open or retain markets and support the export of our animal products. These inspections may be done unilaterally to verify information for
required attestations; or they may be done as part of a bilateral agreement with a trading partner. Currently, EAP has bilateral agreements with many countries that include the requirement for facility inspections. These include, but are not limited to, the European Union, the Russian Federation, Mexico, Australia, Canada, China, Indonesia, Israel, Japan, Korea, Malaysia, and Taiwan. Facility inspections are generally done for specific commodities, such as a variety of animal byproducts to the European Union; rendered meals to Mexico, Indonesia, and Malaysia; several types of non-ruminant fats and feeds to China; pet foods to Australia and Canada; and porcine spray dried blood to Japan and Taiwan.

For some commodities/countries, the VS field offices inspect and approve the facilities locally, and maintain all records at the field level. When required by bilateral agreements or there is a need to provide approved facility lists to trading partners, or for complex inspections, final approval is done by NIES – EAP in Riverdale, MD, and the information is maintained in a central database accessible to the endorsing VS field offices. Information includes the contact data for the facility (address, phone number), the type of facility, approval date, last validated inspection date, expiration date, and detailed information on the type of approval or products eligible for export. EAP currently has approximately 1,000 active facilities in the database (VSPS). These include 96 pet food facilities for Australia; 87 pet food facilities for Canada; 72 facilities for China (pet foods, rendered meals, porcine spray dried blood); 552 facilities for the European Union (variety of animal byproducts); 40 rendering facilities for Indonesia; 2 porcine spray dried facilities for Japan; 6 rendering facilities for Malaysia; 71 rendering facilities for Mexico; 10 facilities for Russia/Kazakhstan/Belarus; 10 facilities for Korea; 30 facilities for Taiwan; and 15 rendering facilities for Thailand. Several of these facilities hold more than one type of approval (e.g., for the European Union, a facility may have 3, 4, or more different commodity approvals). Most facility inspections are done on an annual basis. If a facility holds more than one type of approval (e.g., the EU), a separate inspection package is required for each commodity.

BSE Negligible Risk status and Bovine Commodities:

In May 2013, the OIE General Assembly concurred with the reclassification of the United States as a Negligible Risk country. The U.S. has been working with a number of countries towards their acknowledgement of the new status and the applicability of OIE Code conditions for bovine and ruminant, as well as non-ruminant, commodities. Commodities of principal interest include beef and beef products, gelatin, and pet foods that contain bovine or ruminant meals as ingredients. Also of major interest are safe-to-trade commodities identified by the OIE, as well as non-ruminant commodities such as hydrolyzed protein products and rendered meals that have historically been banned due to BSE-related concerns. The OIE Terrestrial Animal Health Code guidelines provide for safe and unrestricted trade in all U.S. origin bovine products, including rendered meals. The OIE Code also does not support BSE-related prohibitions on non-ruminant commodities.

Regarding bovine meat and meat products, legacy restrictions by importing countries due to BSE include no access for beef, access for deboned beef only, access for bone-in beef from animals under 30 months of age, and access for bone-in beef under the definitions of USDA’s Food Safety Inspection Service. The OIE Code definition of specified risk materials (SRMs) is somewhat different than the U.S. definition (i.e., the OIE Code does not exempt parts of the vertebral column). As part of interagency teams, EAP has been seeking acceptance by our trading partners of the U.S. definition of SRMs, as well as the removal of other restrictions that necessitate costly export verification programs run by the USDA’s Agricultural Marketing Service. As a negligible BSE risk country, our bovine products do not, by definition, include any SRMs. However, U.S. regulations requiring the removal of these tissues will not be repealed, and most of our trading partners demand removal of SRMs because the United States has reported indigenous cases of BSE.

Removal of all BSE-related restrictions on U.S. origin animal products is one of the top ten goals for APHIS, and the major goal for Veterinary Services. The EAP (Products Trade Negotiations Staff) was part of interagency teams that achieved full or expanded market access for U.S. beef meat in 11 countries, including Hong Kong, Singapore, Vietnam, Ecuador, Indonesia, Uruguay, Mexico, Sri Lanka, Trinidad and Tobago, Turks and Caicos Islands, and the Dominican Republic. Efforts to achieve full or expanded market access for U.S. origin beef meat through OIE-consistent protocols are ongoing with
trading partners throughout the world. While our goal is to eventually achieve full market access for U.S. beef in all markets, APHIS has partnered with industry to determine the highest priority markets. These priorities may be based on potential volume of trade, as well as other factors, such as the likelihood of success.

During the summer of 2014, APHIS/VS, together with an interagency team that included State officials, hosted a delegation from China auditing BSE controls in the United States. China has published their findings, and EAP will be a part of an interagency team negotiating in October 2014 for beef market access in China with China’s MOA and AQSIQ.

Other bovine/non-bovine commodities:

In addition to negotiation efforts on behalf of our U.S. beef industries, EAP was able to successfully negotiate removal of BSE-related restrictions and open or expand market access for several other commodities, such as non-ruminant rendered meals (e.g., Thailand); pet foods with U.S. origin ruminant ingredients (e.g., Guatemala, El Salvador, Peru, Barbados, Malaysia, Indonesia); bovine gelatin and collagen (e.g., Argentina, Korea, Peru); fetal bovine serum (e.g., Brazil); and fertilizers with ruminant ingredients (e.g., Mexico).

Aquaculture products
Canada: The EAP continues to work with the Live Animals Staff to retain market access in Canada for US origin aquaculture commodities.

Poultry
The EAP continues efforts to get trading partners to follow OIE guidelines which do not recommend any restrictions on poultry meat and meat products due to H5/H7 subtypes of low pathogenicity avian influenza (LPAI). While the ultimate goal is to avoid all trade restrictions due to this disease, EAP’s mid to short term goals are to get our trading partners to minimize restrictions to the smallest zone possible (e.g. affected county or counties; a concentric zone around affected premises); to limit restrictions to occurrences/findings in commercial poultry only; and to lift restrictions no later than 90 days post cleaning and disinfection of the last affected premises or when the incident is notified to the OIE as closed. To that end, EAP has made some progress this year.

Japan – Following many years of negotiations, EAP has successfully negotiated a protocol with Japan whereby LPAI restrictions are limited to a 10 km zone around affected premises. This is a significant accomplishment and will have a positive impact on our poultry meat exports.

China – EAP successfully negotiated lifting of AI restrictions on the State of Virginia. Efforts continue to get long standing bans removed for the States of Arkansas, Wisconsin, and New York. October 2014 correspondence signed by Dr. John Clifford requests (again) that China remove the bans on these States and provides (again) all the technical information on those events. Due to AI events in commercial poultry, China now also has bans on the States of California and New Jersey. EAP has provided the requisite AI questionnaire to China on the California incident and officially requested the ban be lifted. Similar actions will be taken for New Jersey as soon as the AI questionnaire for that event is completed.

Singapore – Following years of negotiations, Singapore now limits AI bans to the affected county or counties. EAP has successfully negotiated the release of restrictions on Stanislaus County, California.

Hong Kong – Hong Kong also limits bans to the affected county. EAP has successfully negotiated the release of restrictions on Stanislaus County, California.

French Polynesia – EAP has also been successful in getting French Polynesia to limit AI bans to the affected county. Upon official request from EAP, French Polynesia recently lifted AI restrictions on Stanislaus County, California.
Philippines – Following years of efforts, the Philippines no longer imposes LPAI restrictions on U.S. origin poultry meat and meat products.

Taiwan – Our bilateral agreement with Taiwan to voluntarily suspend exports from States with LPAI events until 90 days after the last confirmed case has been working well. EAP intends to initiate discussions with Taiwan to modify our agreement to limit the scope of the restrictions to the affected county or counties – or to a zone, similar to what Japan has accepted.

India: EAP was a major contributor of information to support the WTO complaint the United States brought against India for their continued AI ban on poultry and pork products from the United States. The initial results of that complaint were in favor of the United States. EAP will continue to work to attaining market access for U.S. origin poultry products in India.

Poultry – Other than LPAI
The EAP Staff continues to work unilaterally and cooperatively with other agencies to seek new or expanded market access for U.S. origin poultry products. Our market access request for cooked turkey meat to Australia is one of our 4 priority market issues through the US-Australia FTA/Standing Technical Working Group. New Zealand has finished their risk assessment for turkey meat and published their import requirements; and EAP continues to work with industry and to negotiate with New Zealand for attainable market access. Market access in Uruguay for poultry meat other than turkey meat was finally attained during FY 2014.

The EAP Staff continues to work to gain market access for poultry-based products other than meat. During FY 2014, we successfully negotiated protocols for poultry meals (as well as porcine meals) to Thailand and hydrolyzed poultry protein to Korea.

Pork
With regard to pork products, EAP is working with industry to negotiate the removal of trichinae restrictions (i.e., either freezing or testing) currently imposed by several of our trading partners. Removal of trichinae restrictions is a major goal for the United States and our pork industry in the Trans-Pacific Partnership (TPP) negotiations currently underway with several participating countries, including Singapore. EAP was successful in getting Colombia to accept a protocol for pork meat products that removes trichinae restrictions. Similar agreements are in the works with Peru and Chile. VS recently sent another proposal to Singapore to remove these restrictions, and EAP is awaiting a response.

While removal of trichinae restrictions is a top priority for EAP and our pork industry, EAP is also involved in efforts to get trading partners to remove restrictions on our pork products due to other diseases of concern, including PPRS (South Africa and Australia) and PMWS (Australia). VS recently sent correspondence to Australia requesting expanded market access for U.S. origin pork meat and meat products again, and providing additional requested information on PRRS and PMWS.

Other examples
European Union: The EAP continually worked with both central EU authorities and individual EU countries to retain and expand exports of animal by-products estimated to be worth approximately $500,000,000 annually.

Russian Federation/ Kazakhstan/ Belarus: The EAP retained and expanded U.S. exports of various animal products to the Russian Federation, Kazakhstan, and Belarus by participating in an ongoing interagency effort to negotiate new protocols (and retain and expand pending protocols in the interim) with the three customs making up the Russia-Kazakhstan-Belarus Customs Union (CU). Due to Russia’s ban on U.S. animal products due to political reasons, progress was slower in FY 2014 than hoped for by EAP.

Taiwan: The EAP negotiated new certificates for dog/cat chews and dog/cat food with non-exempt ingredients to implement Taiwan’s new requirements for these commodities which became effective October 1, 2014. EAP continues to negotiate with Taiwan on an accepted protocol for APHIS to re-
approve currently approved facilities for Taiwan to allow them to incorporate new ingredients and facility options; and for a bilaterally acceptable inspection package/protocol that will enable APHIS to inspect and approve new dog/cat food facilities for Taiwan.

**Canada** – EAP, in consultation with the U.S. pet food industry, is in negotiations with Canada on their new import requirements for U.S. origin pet foods and animal byproducts intended for use in pet food production or for rendering, in an attempt to retain market access at least equal to current market access for these commodities.

**China** – EAP has requested market access for U.S. origin bovine blood for technical use (primarily fetal bovine serum and bovine serum albumen). NIES, with assistance from industry, is working on a questionnaire for China. EAP is also working with FAS and AMS to seek a solution to China’s new and cumbersome facility registration process.