

UNITED STATES ANIMAL HEALTH ASSOCIATION - 2009 RESOLUTION

OCTOBER 14, 2009, SAN DIEGO, CA

RESOLUTION NUMBER: 22 APPROVED

SOURCE: COMMITTEE ON TUBERCULOSIS

SUBJECT MATTER: NATIONAL BOVINE TUBERCULOSIS ERADICATION PROGRAM

BACKGROUND INFORMATION:

The current National Bovine Tuberculosis (TB) Eradication Program has had tremendous success in eliminating bovine TB from the United States. However, now that every state has previously achieved “free” status, and available federal funding continues to decline, it is time to update the program to more effectively address risks of reintroduction and to provide flexibility to States. New program standards are needed to maximize disease prevention, while minimizing unnecessary impacts on business.

The United States Animal Health Association (USAHA) recognizes the need to make significant changes in the National TB Eradication Program and generally supports the concepts and priorities outlined by the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) in the July, 2009 document, *A New Approach for Managing Bovine TB: VS' Proposed Action Plan*.

RESOLUTION:

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 expedite review of comments on this *VS Proposed Action Plan* and immediately propose new rules which include: measurable program performance standards; program flexibility to address variables within states and regions; mitigation requirements that address the risk of tuberculosis (TB) transmission from imported cattle, wildlife reservoirs and other potential sources; and implement effective and timely program oversight in cooperation with state and industry partners and consider the establishment of a state-industry oversight board.

USAHA urges USDA-APHIS-VS to carefully review the report and discussion items from the USAHA sponsored meeting in Denver, July 20-21, 2009, *The Future of the National Tuberculosis Program*, and incorporate this input, especially on items where consensus was reached, into the revised TB program rules.

USAHA urges USDA-APHIS-VS to prioritize completion of this rule and to expedite the rule-making process with the goal for completion within two years.

USAHA also supports the concept of a Federal Order, but only as a short-term interim step during this rule making process, in order to allow USDA-APHIS-VS the flexibility to suspend downgrading states' “free” status and to suspend interstate movement requirements for Modified Accredited Advanced states. USAHA urges USDA-APHIS-VS to develop this Federal Order in cooperation with State Animal Health Officials.

INTERIM RESPONSE:

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) would like to thank the United States Animal Health Association's (USAHA) Committee on Tuberculosis (TB) for its support of the concepts and priorities outlined in *A New Approach for Managing Bovine TB: VS' Proposed Action Plan*. This concept paper was published October 5, 2009, in the *Federal Register*, and we accepted comments through December 4. We are summarizing the 70 online and 246 mailed comments we received, and we expect to complete this process in February 2010.

Based on input we received from the public meetings conducted in December 2008, the report from USAHA's *The Future of the National Tuberculosis Program* meeting, and the written comments regarding our action plan, we are developing regulations to support this new approach. The development of these new regulations for the TB program is considered a high priority for VS in 2010. However, amending the regulations for a new approach will take several years.

In the meantime, VS will implement several interim measures that effectively mitigate disease spread while minimizing the negative impact of the existing State status system. One such measure is to suspend the automatic reclassification of States or zones to a lower status when States are unable to depopulate TB-affected herds or when States identify two or more affected herds within 48 months (9 CFR 77.7(c)). This suspension would not prevent States from having their status upgraded when the necessary requirements are met. Secondly, we would suspend the movement and testing requirements associated with modified accredited advanced status (9 CFR 77.10). The suspension of these regulations would apply only to States that have achieved accredited-free status in the past and would be contingent on States continuing to meet certain conditions to mitigate the risk of disease transmission. These interim measures would be in effect until VS proposes regulations for review and public comment and issues final rules.

VS will continue to work closely with stakeholders to obtain input on the proposed strategies, program standards, surveillance plans, and other policy concepts before publishing any proposed regulations and throughout the regulatory process.