UNITED STATES ANIMAL HEALTH ASSOCIATION - 2004

RESOLUTION NUMBER: 19 APPROVED

SOURCE: COMMITTEE ON PUBLIC HEALTH AND RABIES

COMMITTEE ON FOREIGN AND EMERGING DISEASES

COMMITTEE ON WILDLIFE DISEASES

COMMITTEE ON CAPTIVE WILDLIFE AND ALTERNATIVE

LIVESTOCK

SUBJECT MATTER: HOMELAND SECURITY PRESIDENTIAL DIRECTIVE 9

DATE: OCTOBER 27, 2004

BACKGROUND INFORMATION:

Homeland Security Presidential Directive 9 (HSPD 9) of January 2004 establishes a national policy to defend agriculture and the food system from attack, major disasters, and other emergencies. In HSPD 9, the Secretaries of the Interior, Agriculture, Health and Human Services, the Administrator of the Environmental Protection Agency, and other appropriate federal departments and agencies were directed to expand current programs to develop comprehensive and fully coordinated surveillance and monitoring systems for animal disease, plant disease, wildlife disease, food, and public health. The Food and Agriculture Sector Government Coordinating Council recently was chartered to provide effective coordination of agriculture and food security strategies, policy, and communication across government and between the government and the sector to support the nation's homeland security mission.

State fish and wildlife management agencies have the primary authority and responsibility to manage and conserve the wildlife resources of the United States and are represented on a national basis by the International Association of Fish and Wildlife Agencies (IAFWA); however, the state fish and wildlife management agencies have not been actively engaged to date by the federal agencies directed to implement the policy established in HSPD 9. The United States Animal Health Association (USAHA) recognizes the potential role of wildlife in the epidemiology of human and domestic animal diseases, the susceptibility of wildlife species to a large number of foreign animal disease agents and other instruments of bioterrorism, and the importance of state wildlife agency involvement in preventing, detecting, monitoring, and responding to animal disease outbreaks.

RESOLUTION:

The United States Animal Health Association (USAHA) requests that the Departments of Homeland Security, Agriculture, Interior, Health and Human Services, and the Environmental Protection Agency involve the state fish and wildlife management agencies, via the International Association of Fish and Wildlife Agencies (IAFWA), in the activities described in Homeland Security Presidential Directive 9 (HSPD 9). Furthermore, the USAHA requests membership and representation of the IAFWA on the Food and Agriculture Sector Government Coordinating Council. Finally, the USAHA requests that funding and other resources be provided to the state wildlife management agencies to assist them in fulfilling their responsibility for conserving U.S. fish and wildlife resources consistent with the goals of HSPD 9.

RESPONSE:

DEPARTMENT OF HUMAN HEALTH SERVICES (DHHS) FOOD AND DRUG ADMINISTRATION (FDA)

The Food and Agriculture Sector is made up of government and industry representatives. The Government Coordination Council includes and is led by the Department of Homeland Security (DHS), the U. S. Department of Agriculture (USDA), the Environmental Protection Agency, and the Department of Health and Human Services (DHHS) through FDA. Other federal agencies participate as ex officio members such as the Departments of Treasury, Commerce, and Interior (Fish and Wildlife). These and other agencies are recognized to have some programmatic contribution but at a far lower level than DHS,

USDA, and DHHS. Also, state associations are represented by National Associations of Departments of Agriculture Association of State and Territorial Health Officials, National Assembly of State Chief Livestock Health Officials, and the National Association of City and Country Health Officials.

Since FDA received your letter, the Food and Agriculture Sector, through DHS, was approached by the International Association of Fish and Wildlife Agencies requesting membership. We consulted with the Department of Interior who advised that the issue was adequately addressed through current federal, state, and industry representation to protect the food and agriculture supply of the United States. DHS, USDA, and DHHS agreed and then notified the requesting association.

USAHA's Resolution 19 is addressed conscientiously by the Food and Agriculture Sector, recognizing that wildlife management has a role and one that is adequately covered through existing representation at federal, state, and local levels.

UNITED STATES DEPARTMENT OF THE INTERIOR (USDI) NATIONAL PARK SERVICE (NPS)

While I will mention a few of the collaborative efforts to address animal health that the NPS has ongoing with IAFWA, I need to clarify that the NPS also looks to other Federal Departments for the lead in implementation of HSPD 9. The NPS will cooperate with those departments as appropriate but NPS is not a regulatory agency. Rather, NPS is a land management agency with a responsibility, like states, to manage wildlife when it is under our jurisdiction.

The NPS respects the role that IAFWA plays in conserving our national wildlife resources. NPS is a federal agency member of IAFWA and holds a seat on the Federal and Tribal Relations Committee as well as several other committees. NPS has consulted or collaborated with the IAFWA Fish and Wildlife Health Committee on issues including the NPS Interim Foot-and-Mouth Disease Prevention and Response Plans and the National Plan for Assisting States, Federal Agencies, and Tribes in Managing Chronic Wasting Disease in Wild and Captive Cervids, as well as the associated Implementation Plan and Progress report. Most recently NPS and United States Department of Agriculture co-chairs invited IAFWA participation on the Federal Interagency Committee on Invasive Terrestrial Animals and Pathogens (ITAP), Animal Pathogens Subcommittee. Although these collaborative efforts are not directly linked to HSPD 9, they are mutually beneficial to state wildlife agencies and the NPS in managing wildlife health and contribute to protecting the agriculture and food system.

HSPD 9 calls for the development of robust, comprehensive, and fully coordinated surveillance and monitoring systems. NPS units are encouraged to submit samples for zoonotic disease testing (e.g., West Nile virus, rabies) to state or local authorities. If this testing is not available, or for routine diagnostic testing, NPS provides other alternatives to support diagnostics testing on samples from parks. The NPS is working with the U.S. Geological Survey, Biological Resources Discipline, National Wildlife Health Center (USGS, BRD, NWHC) in a plan to contribute wildlife disease surveillance information to a database that is under development. According to the NWHC, the database would serve as a common wildlife disease monitoring tool that could be used by a range of natural resources agencies.

I fully appreciate the importance of IAFWA and other wildlife professionals' involvement in animal health issues to protect the viability of the livestock industries while also preserving free-ranging wildlife. We commend the United States Animal Health Association (USAHA) in promoting and strengthening the relationship between groups representing these two important national resources.

ENVIRONMENTAL PROTECTION AGENCY (EPA) – No response as of 5-26-05

The U. S. Environmental Protection Agency (EPA) looks forward to providing more detailed consideration of this resolution in the near future. They have forward the Resolution to EPA's Office of Prevention, Pesticides, and Toxic Substances (OPPTS), which will provide a response.

DEPARTMENT OF HOMELAND SECURITY (DHS) - No response as of 5-26-05