June 15, 2017

U.S. Secretary of Agriculture Sonny Perdue
U.S. Department of Agriculture
1400 Independence Avenue, S.E.
Washington, D.C. 20250

Re: Executive Order on Promoting Agriculture and Rural Prosperity in America

Dear Secretary Perdue and Members of the Interagency Task Force on Agriculture and Rural Prosperity:

The National Pork Producers Council (NPPC) commends the Trump administration for driving meaningful regulatory reform. U.S. farmers and producers, including U.S. pork producers, consistently cite regulations as the number one burden on their productivity. Unwarranted regulatory burdens force farmers and producers to spend additional resources on professional assistance to ensure compliance or spend their own valuable time deciphering the regulatory maze.

In addition to added costs and lost time, the ever-changing regulatory landscape creates uncertainty for farmers and producers, hindering innovation while making it difficult to formulate investment plans or estimate next year’s returns.

NPPC supports reducing U.S. pork producers’ regulatory burden by generally: increasing accountability and transparency in the federal regulatory process, broadening the scope of required economic analyses, grounding policies in science-based conclusions and encouraging agencies to work more closely with key stakeholders throughout the rule-making process.

Regulatory reform will unlock U.S. economic growth by making America’s farmers and ranchers more efficient and globally competitive while reinvigorating rural communities. As the voice of approximately 60,000 pork producers nationwide, NPPC specifically recommends the following regulatory changes.

NPPC suggests the repeal of these rules:

- **GIPSA, Scope of Sections 202 (a) and (b) of the Packers and Stockyards Act Rule:**
  NPPC opposes this rule due to the restrictions it would place on a producers’ ability to sell and a packers’ ability to buy livestock, likely leading to further industry consolidation. NPPC is asking the USDA to withdraw these rules.

- **National Organic Program (NOP)-Organic Livestock and Poultry Practices Rule:**
  NPPC opposes this rule as it would incorporate welfare standards that are not based on science and that are outside the scope of the Organic Food Production Act of 1990, which limited consideration of livestock as organic to feeding and medication practices.
- **National Trichinae Certification Program**: NPPC supports elimination of this program. Today’s commercial pig production controls exposure to trichinae, and this is demonstrated by the industry’s adoption of the National Pork Board’s Pork Quality Assurance Program (or PQA Plus). PQA Plus has supplanted the National Trichinae Certification Program in the marketplace.

- **Elimination of Trichinae Control Regulations and Consolidation of Thermally Processed, Commercially Sterile Regulations**: NPPC supports the consolidation of the thermally processed, commercially sterile regulations. This body of regulations can be addressed through the Hazard Analysis and Critical Control Point, or HACCP regulation. NPPC asks that this regulatory action be taken independently of any effort to eliminate the FSIS trichinae control regulations, which are still important to international trade.

- **Requirements of Disposition of Non-Ambulatory Disabled Veal Calves Rule**: NPPC supports elimination of these requirements as they apply to fed veal calves. NPPC does not agree that allowing these animals to rest and become ambulatory inherently favors humane handling violations. This rule results in the waste of safe, wholesome product.

- **Antimicrobial Animal Drug Sales and Distribution Reporting Rule**: NPPC opposes this rule requiring drug sponsors, when meeting their sales reporting obligations under ADUFA 105, to estimate those sales by species. Since the sponsors do not collect this information, and due to the complexity of the distribution system, these estimations will be inaccurate and misleading. These estimations will not provide valuable or accurate data which the industry can use to benchmark continuous improvement in the responsible use of antibiotics.

- **Food Safety and Modernization Act, Animal Feed Rule**: NPPC supports limiting the applicability of the animal feed rule in the Food Safety Modernization Act (FSMA) strictly to facilities and enterprises producing animal feed for sale in commerce and not to the production of animal feed by owners of animals for their animals, whether that production occurs on a farm, as defined by the rules, or elsewhere.

- **Federal Motor Carrier Safety Administration-Electronic Logging Devices (ELDs) Rule**: NPPC supports repealing or, at a minimum, exempting livestock haulers from the ELD rule because the rule, along with existing hours of service (HOS) rules, does not adequately accommodate the unique needs of the livestock industry and may force small business owners out of the marketplace while also decreasing driver safety and jeopardizing animal welfare.

NPPC suggests the implementation of these rules:

- **Classical Swine Fever Rule**: NPPC urges the finalization of this rule that would implement the Animal and Plant Health Inspection Service’s (APHIS) science-based risk assessment that Mexico is free of Classical Swine Fever (CSF). The U.S. pork industry is
a strong supporter of free trade and of using epidemiological science and risk analyses to determine if trade can be safely conducted between countries.

- **Hours of Service Exemption**: NPPC encourages exempting livestock haulers from the Federal Motor Carrier Safety Administration’s (FMCSA) existing hours of service (HOS) rules, as they do not adequately recognize or accommodate the unique needs of livestock haulers.

- **Modernization of Pork Slaughter Rule**: NPPC supports the implementation of this rule to increase the efficiency and effectiveness of the federal meat inspection process allowing for the rapid adoption of new food-safety technologies.

- **National List of Reportable Diseases (NLRAD)**: NPPC encourages the creation of NLRAD as a mechanism for USDA to compel reporting diseases of interest. This will assist them in meeting their OIE responsibilities and build confidence with our trading partners. It is an essential step in the Trichinae Negligible Risk Compartment Development.

- **National Animal Identification System (NAIS)**: NPPC encourages the development of this system as it will allow the USDA to trace the movements of an animal, or group of animals, to the herd of origin within 48 hours during an animal health emergency.

- **Proposed Action Plan on Swine Brucellosis and Pseudorabies**: NPPC supports the implementation of this plan to modernize the programs for surveillance and response to Swine Brucellosis and Pseudorabies to all areas of the U.S. The rule will give our trading partners the confidence they seek that we are free of these diseases in the domestic herd.

NPPC appreciates the Trump administration’s commitment to revitalizing rural America by enacting meaningful regulatory reform. Our producers and staff are eager to work with you and welcome the opportunity to discuss these issues in further detail. Should you have any questions or wish to discuss this matter further, please don’t hesitate to contact me.

Thank you for your consideration.

Sincerely,

Ken Maschhoff
President
National Pork Producers Council