

**National Pork Producers Council  
Comments Regarding USDA APHIS Strategic Plan Framework**

**Docket ID APHIS-2022-0035**

On behalf of America's 60,000 pork producers, NPPC is pleased to submit comments on APHIS's Strategic Plan Framework. We applaud APHIS for its foresight in framing future programs and activities around those trends that will drive American agriculture's long-term productivity. Our specific suggestions are:

Goal 1. Cultivate a talented, diverse, and public service focused workforce where employees are supported, valued, and engaged.

The difficulty in recruiting veterinarians to work in the field of food animal production is a problem for the industry as well as the Federal government. Obviously, competitive salaries are key to their recruitment and retention. We suggest APHIS work with the Office of Personnel Management to review the General Schedule 701 series classification standards to raise the grade levels of veterinarians to be more competitive with private industry. Also, there needs to be some strategic thinking around ways to assist recent veterinary graduates with student loan debt. Recent graduates often seek those jobs that provide such assistance, making the Federal government less competitive.

Goal 2. Deliver science-based solutions that reduce the impacts of zoonotic and emerging diseases and ecosystem changes.

NPPC applauds APHIS for recognizing the impact of emerging and zoonotic diseases on animal agriculture and public health. The potential impact cannot be overstated given the public's increasing interest in the safety and wholesomeness of their food source. The pork industry is incredibly supportive of the objectives you have identified. While you have identified working collaboratively with other agencies to develop an early warning system for these diseases, we strongly suggest you include animal industry as a part of that process. Producers and their veterinarians are often the first to see new and emerging diseases and can play a significant role in the success of an early warning system. This is particularly true of the pork industry where the Swine Health Information Center strategically focuses on foreign animal and emerging diseases.

Goal 3. Protect agriculture from plant and animal diseases and pests.

This is the core mission of APHIS and is critical to the future productivity of American agriculture. The user fees APHIS collects to support the pest and disease exclusion activities of Customs and Border Protection (CBP) are currently inadequate to provide additional staffing and detector dog teams needed to meet the growing threat posed by increased foreign travel and trade. The importance of additional inspectors was highlighted during the COVID pandemic when staff was shifted from airport to cargo inspections resulting in a significant increase in

pork product EANs as a result of additional resources to support cargo inspections. NPPC urges APHIS to begin the regulatory process of increasing the user fee rate to adequately cover the shortfall in CBP staffing.

NPPC is concerned about the ability of the National Veterinary Stockpile to effectively have and deliver the tools needed to respond to an animal disease emergency. We encourage APHIS to request additional funding for the NVS to stockpile laboratory equipment, testing supplies, and diagnostic tests for foreign animal diseases and for equipment for large animal depopulation, disposal, and disinfection, which is sorely needed. The methods to request and deploy those supplies and equipment should be re-evaluated and streamlined as necessary to make those resources available quickly when needed.

The industry has frequently raised the issue of short staffing at the Center for Veterinary Biologics (CVB), which has resulted in slower approval of veterinary biologics needed to improve the productivity of animal agriculture. NPPC suggests it is time to look strategically at how the service at CVB can be improved to provide more timely approval of veterinary biologics while maintaining product safety utilizing new and novel technologies.

One of APHIS's major successes is the regulatory framework for approval of genetically modified organisms, which have contributed immeasurably to the productivity of American agriculture. That same success has been denied to animal agriculture because of the jurisdictional dispute with the Food and Drug Administration. NPPC strongly urges APHIS to work with the Secretary and the Administration to include regulation of gene editing of animals under APHIS authority.

#### Goal 4. Maintain and expand the safe trade of agriculture products.

U.S. agriculture exports represent the difference between profit and loss for most agriculture industries. We applaud APHIS for recognizing the importance of trade as a strategic investment in the future profitability of U.S. agriculture. NPPC is concerned that staffing on the Import/Export Staff of Veterinary Services is not adequate to meet the growing need for negotiating new market access and maintaining existing markets. As the agency contemplates a new strategic plan, it is critical that staffing and resources necessary to expand trade be at the forefront of that plan. We have the same concern about staffing for International Services (IS). IS personnel play a critical role in working with regulatory authorities in importing countries to address Sanitary and Phytosanitary (SPS) issues during market access negotiations and market interruptions. We recognize stationing personnel overseas is expensive, but it must be noted this is the cost of doing business in an increasingly complicated and controversial SPS issues environment. This must be recognized as strategically important to APHIS and to the industries it serves.

#### Goal 5. Manage wildlife damage and threats to agriculture, natural resources, property, and people.

Wildlife Services (WS) now plays a significant role in APHIS's mission, especially with wildlife diseases emerging as a significant threat to human and animal health. The feral hog control program is critical to the swine

industry as these animals pose a serious threat to the health of the U.S. swine herd and ultimately to our export markets. Research to develop new control methods must be considered a strategic priority. NPPC suggests now is the time to begin requesting additional resources in the President's budget to position the WS program to meet the growing threat of wildlife diseases.

Goal 6. Promote the welfare of animals.

NPPC recognizes the evolving concern about animal welfare, and we congratulate APHIS for recognizing the potential for future regulatory action. NPPC and the producers we represent have always been at the forefront of concern for the welfare of our animals, using science-based information to establish standards of care. The National Pork Board's Pork Quality Assurance Plus Program provides guidance to producers on proper handling and care of their animals, including environmental standards, antimicrobial use, and timely euthanasia. We urge APHIS to recognize that farm animal welfare is best left to producers and their veterinarians, using the science-based standards of PQA Plus.

In conclusion, as APHIS begins the process of developing a new strategic plan, we hope you will use the lessons learned from the COVID pandemic: Surveillance, laboratory diagnostic capacity, and response capabilities are the key to a successful control and eradication effort whether it is a human or animal disease.