

National Pork Producers Council
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Regulatory Analysis and Development, PPD
Animal and Plant Health Inspection Service
Station 3A – 03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

APHIS-2022-0023-0001: User Fees for Agricultural Quarantine and Inspection Services

To Whom it May Concern:

The National Pork Producers Council (NPPC) appreciates the opportunity to comment on the User Fees for Agricultural Quarantine and Inspection Services. NPPC is the global voice for the U.S. pork industry and consists of 43 affiliated state organizations, representing America's 66,000 pork producers who produce a demonstrably safe, wholesome, and nutritious product that is appreciated on American and international tables.

Pork producers care deeply about the health and welfare of their animals. Healthy animals help to ensure safe food for consumers. Ensuring a safe, nutritious food supply is of utmost importance. NPPC believes the work by the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) and the Department of Homeland Security's (DHS) U.S. Customs and Border Protection (CBP) is essential to protect agriculture, by intercepting foreign animal and plant pests and diseases. This work is especially important, considering the threat of foreign animal diseases (FADs), such as Foot-and-Mouth Disease (FMD) and African Swine Fever (ASF).

The \$1 trillion U.S. agriculture sector is a crucial component of the American economy. CBP agriculture inspectors perform critically important agricultural inspections every day at the nation's ports of entry to prevent the entry of foreign plant and animal pests and diseases. FADs, such as ASF, which has killed more than one out of every four pigs globally, would have a devastating effect on American livestock producers if they reached our shores. Numerous foreign plant pests and diseases could significantly damage agricultural production in the U.S and hinder exports of major agricultural commodities.

Specific to livestock, an outbreak of FMD in the United States could cause nearly \$240 billion in economic damage across the agricultural sector. Even a single-species disease, like ASF, is estimated to cause tens of billions of dollars in economic losses, should it come to our shores. In 2022, 23.5% of U.S. pork production was exported, equaling a total of \$7.68 billion. That market would disappear overnight if ASF were to be reported in the United States. This would also negatively affect the 155,800 U.S. jobs that are supported by pork exports.

Agriculture inspection of international passengers and cargo is carried out by CBP's Agriculture Specialists, Technicians and Canine Teams. These CBP personnel are ordinarily funded by Agricultural Quarantine and Inspection Service user fees, collected by APHIS, and transferred to CBP to cover salaries and expenses of the inspectors. The AQI program was running at a significant deficit, even before the COVID-19 pandemic placed unprecedented strain on the system. The proposed changes to the user fee program will address this funding deficit, as well as address the recently identified threat of plant and animal disease and pests presented by certain, previously exempt, pathways.

It is imperative that the agriculture inspection program has the resources needed to ensure our nation's agriculture and natural resources are protected. Increased user fees can provide the necessary funding to strengthen these programs, enhance inspections, and implement preventative measures to safeguard agricultural production.

NPPC supports these proposed changes in fees to continue supporting the Agriculture Quarantine and Inspection Services, as they play a crucial role in protecting domestic agricultural industries from the introduction and spread of pests, diseases, and invasive species.

NPPC appreciates the opportunity to submit comments on the User Fees for Agricultural Quarantine and Inspection Services and looks forward to continuing to support the program.

Sincerely,



Dr. Ashley Johnson
Director of Food Policy
National Pork Producers Council