

January 30, 2025

National Pork Producers Council Comments: Docket Number APHIS-2022-0061

The National Pork Producers Council (NPPC), which represents the interest of more than 66,000 U.S. pork producers, appreciates the opportunity to submit the following comments on the U.S. Department of Agriculture (USDA) Animal Plant Health Inspection Service (APHIS) proposed rule to codify the United States Swine Health Improvement Plan (US SHIP) as a federal regulatory program.

Based on the proven successes of the similar National Poultry Improvement Plan (NPIP) program, our industry is excited to see US SHIP become an APHIS regulated program. The current program disease certifications aptly address the growing African swine fever (ASF) and classical swine fever (CSF) risks to the United States, and the program structure also allows for industry to address challenging endemic diseases in the future.

### **What We Have to Lose**

America's pork producers annually export more than 25 percent of their total production to over 100 countries. The U.S. is among the top global exporters of pork, shipping more than 2.9 million metric tons, valued at nearly \$8.2 billion in 2023. Those exports equated to an average of \$64.12 in value for each hog marketed and supported 140,000 American jobs.

A detection of ASF or CSF in the U.S. would immediately stop U.S. pork exports, which is expected to drop live hog prices by 40 to 50 percent as a result of surplus pork intended for export. Additionally, the oversupply of pork in the domestic market would lead to price reductions in other proteins and lower demand for grain, which would reduce feed prices. If the disease were to spread to feral swine in the U.S., and exports did not resume over a 10-year period, pork industry revenue losses are estimated at \$50 billion. Even if ASF was under control, and U.S. pork reentered export markets within two years, losses are still estimated to be \$15 billion.

### **Value of US SHIP to the Swine Industry**

Following the detection of a foreign swine disease in the U.S., trading partners expect assurance that we know where the disease is and is not present. This requires federal oversight, collaboration with state animal health authorities, robust surveillance, a mandatory traceability system for all interstate and intrastate movements, and implementation of enhanced biosecurity measures to stop the spread of the disease. Importantly, these are all components of the proposed US SHIP program.

### **Areas of Support**

NPPC strongly supports the proposal for the General Conference Committee (GCC) to function as an independent Federal Advisory Committee (FACA). As a species-specific program, US SHIP needs an advisory committee whose members represent the industry and have the opportunity to advance policy recommendations that are exclusively meaningful to the swine industry, rather than to function as a

subcommittee within one of USDA's existing Advisory Committees. The NPIP's success is largely driven by their GCC's advisory committee role and US SHIP's success will similarly depend on an independent committee.

NPPC also supports limiting eligibility of Official State Agencies (OSA) to veterinary authorities responsible for enforcing a state's swine health regulations (i.e., a state animal health official). While we agree on the need for a regulatory role in a program that monitors for diseases that are not currently known to exist in the United States, state pork associations are uniquely suited to add value in areas such as producer outreach and education, delegate selection, identifying needs for resolutions/standards, maintaining data, and more. Therefore, we strongly encourage APHIS to explore and support opportunities for state pork associations to collaborate with the OSAs.

The US SHIP Technical Committees align well with the three key swine health pillars (biosecurity, traceability, and surveillance), which will allow us to continue leveraging established, successful industry programs and more easily identify subject matter experts and leaders in these areas to serve on these committees. NPPC supports the inclusiveness of the committee structure, bringing representatives from the swine and pork products industries, universities, and state and federal governments to the table. It is critical to limit the role of the committee members to consideration of proposed changes and provision of recommendations to the House of Delegates based on their scientific and technical merit. It is the role of the House of Delegates to otherwise evaluate the proposal's value to the industry.

We are supportive of the requirement for testing to be conducted in an authorized laboratory and with sample types that are approved by the Administrator to detect the presence of ASF and CSF. This is critical for international acceptance of the program. We strongly encourage APHIS through the National Animal Health Laboratory Network, to continue to validate sample types and tests to allow for widespread testing if needed.

We are also in favor of the inclusion of an annual audit. This is consistent with the NPIP program and will help demonstrate and assure industry participants, regulators, and international partners that facilities adhere to the requirements of the Plan. Additionally, there is mention of APHIS authority to participate in ways equivalent to the OSA including, but not limited to, site inspections and access to records. While this is inconsistent with NPIP, the disease certifications that the program is based on are high-consequence and highly regulated at the state and federal level and it is important for international partners to see the federal agency's presence throughout the program.

Lastly, we were encouraged to see the GCC's responsibilities include advising and making recommendations to the Department on maintaining adequate funding and making yearly recommendations to the Department with respect to the US SHIP budget.

**Opportunities for consideration**

We would appreciate clarification of the proposed language in section 148.6(b)(1) that states, “participating swine operations only introduce herd additions that have either been exclusively sourced from certified ASF–CSF Monitored sites or sites that have participated in testing and clinical observation of their herds sufficient to demonstrate freedom from ASF and CSF.” While we agree that this requirement would further prevent introduction of disease to herds certified as ASF–CSF Monitored, it is important to clarify what is meant by “participated in testing.” Given the current surveillance restrictions for these diseases, producers can only collect samples and submit them for testing in the event of a disease incident or death loss suggestive of ASF or CSF. How is a producer receiving swine from another site able to verify or validate that another producer is “participating in sufficient testing and clinical observation”?

Regarding proposed language in section 148.7(a), “the OSA may designate qualified persons as authorized agents to collect samples for diagnostic testing as required”, we strongly recommend APHIS recognize the swine industry’s Certified Swine Sample Collector (CSSC) program.

**In Closing**

The current US SHIP pilot program demonstrates the progress that can be made when industry, state and federal authorities collaborate to address a common goal. NPPC applauds the foresight by industry stakeholders to initiate the US SHIP program. The contributions of USDA APHIS Veterinary Services staff have been important in the development and maturation of the program, bringing it forward as a proposed rule. We also recognize and thank USDA APHIS leadership for supporting this industry-led effort and for seeing the potential value to U.S. swine health.

Sincerely,



Bryan Humphreys, CEO, NPPC