

March 25, 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 set of **additional** 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.

Specifically, we would like to re-emphasize the importance of establishing the General Conference Committee (GCC) as an Advisory Committee under the Federal Advisory Committee Act.

The current effort to create government efficiencies by targeting discretionary advisory committees has raised significant concerns. As a species-specific program, swine health advisements to USDA need to come from species-specific experts. As with the National Poultry Improvement Plan (NPIP), SHIP is currently being guided by a General Conference Committee (GCC) which oversees the plan's implementation and operations. The current SHIP GCC membership is made up of swine health experts who provide scientific guidance specific to the swine industry to establish standards for producer enrollment and operation of the plan.

One suggestion has been to create subcommittees within the existing Secretary's Advisory Committee on Animal Health that would serve as the GCC for both the NPIP and SHIP. Given the species-specific requirements of both NPIP and SHIP this is a completely unworkable suggestion. It would be impossible to have the depth and breadth of both poultry and swine health expertise needed, or producer representation, to effectively administer both programs.

These two advisory committees (NPIP and SHIP) are active and guide work on a frequent basis. NPIP has a long history of success and has been instrumental in preserving trade during poultry disease outbreaks for nearly 100 years. With the increasing threat of trade limiting diseases, producers are excited about creating a similar program for the pork industry.

There is a need for these advisory committees and we urge APHIS to establish a stand-alone advisory committee for the US SHIP program under the Federal Advisory Committee Act.

Sincerely,



Bryan Humphreys, CEO, NPPC