National Pork Producers Council®

The Global Voice for the U.S. Pork Industry

January 6, 2025

The National Pork Producers Council (NPPC) appreciates the opportunity to provide comments on the USDA-APHIS new world screwworm response.

These comments will address components of both:

1. The response playbook; and
2. The NWS national continuity of business: standardized animal health certificate guidance document.

NWS Response Playbook

It is difficult to fully understand the response plans while several of the resources and tools are still in development including the NWS Epi questionnaire, SOP on how to perform animal observations, management/disposal of carcass, and others. We strongly recommend that there be stakeholder input into the development of these resources as well as an opportunity for stakeholder review and feedback when these additional resources become available.
Based on the information available as of January 6th, we have the following comments:

- Regarding key activity #1 (page 5), *effectively manage a coordinated response and communications with stakeholders and the public*, it is critical that industry stakeholders continue to be included in response planning. **All** livestock sectors should maintain a 'seat at the table' during preparedness and response phases.

- *Coordination of public awareness campaigns through stakeholder notices, webinars, other materials could and should be done prior to the detection of NWS in the U.S.* (page 7). Industry stakeholders have communication opportunities distinct from regulatory agencies and these should be utilized. There should be a proactive, coordinated effort to develop a communications plan with stakeholders prior to the incursion of this pest.

- Regarding contact tracing as part of the epi investigation (page 9), is there enough known about the survivability of the fly/larvae/eggs on *materials or in manure* to justify inclusion? If materials or manure flag a facility as an epi link there needs to be survivability and risk data to justify that. We are hearing that this pest does not survive well in liquid manure and needs soil or dry a dry surface to pupate.
    - What is meant by '*infested materials*'? This should be clarified and only included if there is a **known** risk as a fomite.
        - Additionally, does contact tracing stop at a sanitation point? Trailers used on a sow farm as an example. Once they are washed and disinfected, we do not believe it is necessary to trace their movement further.

- In many cases, conducting a *traceback of 2 months* will include a substantial amount of animal movement (page 9). What justification is used to recommend a traceback for a period of 2 lifecycles? We believe that active observational surveillance, especially in populations of animals like swine who are observed

daily, should allow for a shorter time period to include in a traceback investigation. Additionally, if the life cycle of this fly cannot sustain itself in a confinement housing environment without access to dry materials or soil, that further justifies a shorter traceback period.
    - Can 1 lifecycle be considered?

- Concerns remain about the expectations of the physical examination (page 12), especially for animals like swine that are held in confinement. NPPC believes the physical examination should focus on myiasis, **especially in situations where the animals are observed daily.**
    - Could the intensity of the inspection requirements be more risk based? Higher risk situations including a prem with known infestation of animals or presence of flies based on environmental surveillance?

- **Adequately defining what would constitute a wound of concern** is critical for response preparedness. "*Producers must report suspect cases immediately to the veterinary authority*…" (page 13). The stakeholder organizations (state and national) should be leveraged to communicate with producers about clinical signs and what constitutes a wound of concern. At his time, it is not apparent that that producer communication is happening among producers of all susceptible livestock species.

- *Once inspected, non-infested animals may be moved off the premises if Infested Zone movement requirements are met* (page 14). **Regarding an infected premises, allowing animals who are free from infection to move from a premises to slaughter or for further production, is critical for business continuity.** Active daily observations of swine moved to further production can mitigate risk of those movements.
    - Regarding inspection, could the intensity of inspection requirements again be more risk based? Higher risk situations including a prem with known infestation of animals or presence of flies based on environmental surveillance?
    - Further, given that this is not a food safety concern, infested animals should be allowed to be treated with a spot spray and then move to slaughter after appropriate withdrawal times are observed.

- Regarding aggregation points, "*return infested animals to the premises of origin. If an inspection of all animals in the lot cannot be performed, return all animals to the premises of origin or hold and treat animals according to guidelines*" (page 14). In the swine industry, in almost all cases, these animals will not be allowed to return to the home premises, nor will they be able to stay at the aggregation point for an extended period. See additional comments on aggregation points, below.

- Page 21. Does the National Veterinary Stockpile have the required equipment and supplies to implement this plan? If not, what is needed? NPPC encourages USDA to share with states and stakeholders information about NVS inventory related to NWS response so states and industry can be better prepared regarding resource needs.

- When will the NAHLN labs be utilized for diagnostic support? In a response, NVSL diagnostic capacity cannot be a bottleneck for the response.

- Does every NAHLN lab have an entomologist? Are there standardized protocols being sent to the NAHLN labs? Is confirmation still needed by NVSL? Can a control area be established on a NAHLN diagnosis.

National Continuity of Business Standardized Animal Health Certificate Guidance

NPPC appreciates the inclusion of the following exemption: *animals subject to this guidance that originate from premises where they are raised indoors and can demonstrate limited NWS risk OR are raised or located in a habitat not suitable for the NWS fly and larval development, are exempt from movement requirements if approved by the SAHO and USDA APHIS.*

In the event that the above exemption is not approved by the SAHO or USDA APHIS, the below comments apply.

Cull channels/aggregation points:

- Cull channels exist for both breeding animals and market/feeder animals. The cull channels for swine are unique in that there is significant sorting required to assemble groups of animals that meet the requirements for specific slaughter plants. This sorting requires time and observation. **Cull animals cannot be treated at aggregation points, cannot be held at aggregation points, and cannot return to the prem of origin after arriving to an aggregation point for biosecurity reasons.** The current requirements for animals that are shipped from the prem of origin and not slaughtered within 24 hours, would be extremely difficult for the swine industry and would significantly impact this economically important segment of the industry.
  - Extending the time-to-slaughter from 24 hours to 48 hours would be a very welcome update.
  - Another consideration could be to discount the transportation time and focus only on the amount of time an animal is 'standing at a location' (aggregation point).

- Regarding the inspection requirements, "*All animals were individually inspected and found free of obvious wounds and evidence of NWS infestation.*" **An animal with a 'wound' in the absence of myiasis should not be a disqualifier.** Further, animals that are moving to further production receive daily observation and infestation of a wound would become apparent early.

- On page 6, "*The premises is actively managing NWS infestation by isolating and treating all NWS infested animals and implementing animal husbandry best practices to limit larval development on the premises*." What is meant by animal husbandry best practices?

- Regarding inspections of animals, "*performed by accredited veterinarian or approved state/federal animal health official for requesting an entry permit. This inspection can be performed up to 7 days before movement. If the entry permit inspection occurs between 4 to 7 days before movement, then a second inspection must still occur within 3 days prior to movement. This second inspection can be performed by an NWS certified inspector. If the entry permit inspection occurs within 3 days prior to movement, then only one inspection is required and must be performed by an accredited veterinarian or approved state/federal animal health official.*"

- **We believe this will overwhelm the number of accredited veterinarians and regulatory veterinarians available to conduct these assessments.** Can individuals in production be deployed to address the need?
  - We are excited about the training module that is in development (*NWS Inspector Certification Program)* focusing on *myiasis clinical identification and animal inspection.* USDA could consider working through accredited veterinarians who assign individuals as a representative of them. Individuals who complete this training should be allowed to serve as a primary inspector for movement and when a concern is identified, the accredited and/or regulatory veterinarian is called in.
- We also encourage updating the inspection requirements to a single inspection pre-movement. This inspection should be allowed to be conducted by a trained NWS inspector through the program mentioned above.

- The U.S Food and Drug Administration (FDA) and Environmental Protection Agency (EPA) provide information about NWS treatments and pesticides.
  - 'treatment' should be risk based. Thousands of weaned pigs could qualify for treatment under the current plan, from a single premises, weekly. The time, cost, animal stress that would be imposed by requiring treatment of all swine who are moved but not slaughtered within 24 hours, would be extremely significant.
    - Could treatment requirements be more risk based? Higher risk situations including a prem with known infestation of animals or presence of flies based on environmental surveillance?
      - Animals destined for slaughter who are inspected and have no evidence of myasis should be excluded from treatment.
  - Given that no treatment options are approved for the treatment of New World Screwworm in swine, an extended withdrawal time will be applied. This should be considered as a substantial barrier for animals destined for slaughter near the time of treatment.
  - Products receiving conditional approval by FDA need to fit production, taking into consideration route of administration and withdrawal time.

NPPC stands ready to collaborate with USDA on specific response strategies for the pork industry as there are unique characteristics that modifies the risks encountered with some other susceptible livestock species.

Thank you for your consideration.

Sincerely,

Dr. Anna Forseth
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National Pork Producers Council