



James Mulhern, *President & Chief Executive Officer* | Randy Mooney, *Chairman*

November 17, 2015

Docket Clerk
U.S. Department of Agriculture, Food Safety and Inspection Service
Patriots Plaza 3
1400 Independence Avenue SW
Mailstop 3782
Room 8-163A
Washington, DC 20250-3700

Re: Eligibility of Namibia To Export Meat Products to the United States Proposed Rule
(Docket No. FSIS-2012-0028)

To whom it may concern:

The National Milk Producers Federation is pleased to provide the U.S. Department of Agriculture Food Safety Inspection Service (USDA FSIS) comments on Eligibility of Namibia To Export Meat Products to the United States Proposed Rule (Docket No. FSIS-2012-0028). The National Milk Producers Federation (NMPF), based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 32,000 dairy producers on Capitol Hill and with government agencies. Visit www.nmpf.org for more information.

NMPF is a proponent of well-designed trade policy and utilizing science-based standards to facilitate international trade. We believe that every effort should be made to develop an integrated domestic-foreign trade policy which encourages reciprocity, elimination of unfair trade restrictions and a movement toward dismantling barriers to U.S. exports. Over the past decade, the U.S. dairy industry has experienced over 20 percent annual growth in exports now totaling approximately 15 percent of domestic milk production (\$7.2 billion in 2014). In that time the U.S. dairy industry has become a global leader and is the market leader in dairy exports for such products as cheese, skim milk powder, whey products, and lactose.

The USDA FSIS issued a proposed rule that, if implemented, would allow the importation of beef and beef products from Namibia. NMPF appreciates and supports FSIS's work to develop equivalence audits as a means of assuring the safety of meat and meat products imported into the United States. We recognize that considerable effort has been spent on the equivalency audit of Namibia's food safety system. However, we are strongly opposed to opening the United States to imports of meat from Namibia because the USDA Animal and Plant Health Inspection Service (APHIS) has not conducted a review of the disease status of Namibia and therefore not published a formal risk assessment for comment. This type of assessment is warranted because, as of November 16, 2015, Namibia has had 29 outbreaks of Foot and Mouth Disease (FMD) in cattle from a focal occurrence beginning in June 2015.

NMPF is committed to ensuring the continued health and well-being of the U.S. dairy cattle herd to produce safe and wholesome dairy products for consumers. NMPF supports the development of animal product import rules based on scientifically informed principles and

Agri-Mark, Inc.
Associated Milk Producers Inc.
Bongards' Creameries
Cooperative Milk Producers Association
Cortland Bulk Milk Producers Cooperative
Dairy Farmers of America, Inc.
Dairymen's Marketing Cooperative, Inc.
Ellsworth Cooperative Creamery
Farmers Cooperative Creamery
FarmFirst Dairy Cooperative
First District Association
Foremost Farms USA
Land O'Lakes, Inc.
Lone Star Milk Producers
Maryland & Virginia Milk Producers Cooperative Association
Michigan Milk Producers Association
Mid-West Dairymen's Company
Mount Joy Farmers Cooperative Association
Northwest Dairy Association
Oneida-Madison Milk Producers Cooperative Association
Prairie Farms Dairy, Inc.
Premier Milk Inc.
Scioto County Cooperative Milk Producers' Association
Select Milk Producers, Inc.
Southeast Milk, Inc.
St. Albans Cooperative Creamery, Inc.
Swiss Valley Farms Company
Tillamook County Creamery Association
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.
Zia Milk Producers, Inc.

consistent with the World Organization for Animal Health (OIE) guidelines. We have concerns regarding the resources and the infrastructure of Namibia to consistently perform adequate risk management in order to mitigate the risk for the introduction of FMD into the United States through the importation of fresh Namibian beef and beef products. Without an APHIS published formal risk assessment, it is uncertain if Namibia has adequate safeguards in place to control and manage FMD and other foreign animal diseases.

Safeguarding animal health by preventing the introduction of trade-limiting foreign animal diseases such as FMD is the primary way to protect animal agriculture from financial ruin. Every effort to ensure there is negligible risk from the importation of meat and meat products from FMD-positive countries should be taken before these products are approved for import into the United States.

NMPF recognizes that FSIS's purpose in conducting foreign equivalency audits is limited to evaluating the subject country's food safety programs and not inherently to protect the United States from the introduction of a foreign animal disease. However, FSIS presumably relies on applicable requirements established by APHIS to determine the disease status of each exporting country. Therefore, we urge FSIS to take no further action on this proposed rule until APHIS has formally conducted a thorough risk assessment of the FMD outbreak in Namibia.

Please contact me if you have any questions about these comments.

Sincerely,

A handwritten signature in purple ink that reads "Jamie Jonker". The signature is written in a cursive, flowing style.

Jamie Jonker
Vice President, Sustainability & Scientific Affairs