# National Milk Producers Federation

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August 25, 2008

U.S. Department of Homeland Security
Science and Technology Directorate
Mr. James V. Johnson
Mail Stop #2100
245 Murray Lane, SW
Building 410
Washington, DC 20528

**Re: Notice of Availability of the Draft Environmental Impact Statement for the National Bio and Agro-Defense Facility (NBAF)**

Mr. Johnson:

The National Milk Producers Federation appreciates the opportunity to provide comment on the Department of Homeland Security's (DHS) Draft Environmental Impact Statement for the National Bio and Agro-Defense Facility (NBAF facility) as part of the DHS proposal to close the Plum Island Animal Disease Center (PIADC) and move its biological research laboratory to a new location on potentially on the mainland United States. 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 31 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 40,000 dairy producers on Capitol Hill and with government agencies.

**Background**

Since 1954, PIADC has been responsible for research and diagnosis to protect United States animal industries and exports against catastrophic economic losses caused by foreign animal disease agents accidentally or deliberately introduced into the U.S., including Foot-and-Mouth Disease (FMD). In 2003 the management of the PIADC was transferred from the U.S. Department of Agriculture (USDA) to DHS. The proposed NBAF facility would replace the PIADC facilities for research high-consequence biological threats involving zoonotic (i.e., transmitted from animals to humans) and foreign animal diseases. NMPF has worked with the both USDA and DHS for years on the need for a world class foreign animal disease research center of which the NBAF facility will fulfill.

NMPF's primary concern is that the NBAF facility has adequate protection so that no accidental release of a disease such as FMD could occur. As such, no matter where it is located, the facility needs to have a large animal biosecurity level 3 and 4 laboratory so that research can be conducted on diseases such as foot-and-mouth disease. ***One key component of these facilities is that they are adequately funded to remain up-to-date with modern technologies that evolve to ensure that they continue to provide the necessary security against a release of harmful microorganisms.***

**Consequences of an Accidental or Intentional Outbreak of FMD**
The cost to the dairy industry of an outbreak of FMD in the U.S. would vary, depending upon the speed of spread and the effectiveness of the response. However, recent epidemiological studies conclude that any outbreak in any region with a concentration of livestock production would likely be quite serious. A 1999 University of California at Davis study estimated that a foot-and-mouth disease outbreak optimistically limited to California's South Valley would result in the destruction of 20% to 100% of the region's dairy herds. Resulting losses of milk production plus the containment and depopulation costs are conservatively estimated at $325 million to $1.75 billion, adjusted for 2007 prices. A 2007 study published in the Journal of the American Veterinary Medical Association demonstrated that an outbreak spread through a sale barn or state fair could be multiplied by 10- or 20-fold, as would the dairy industry's cost, to as much as $30 billion or more. Finally, even a quickly contained foot-and-mouth disease outbreak could close overseas markets to U.S. dairy export sales. These were worth over $3 billion in 2007, and the loss of these sales would have an additional, disastrous impact on U.S. milk prices.

We believe that the experience in the United Kingdom last summer is instructive with regard to the potential hazards in working with highly-contagious microorganisms. Due to plumbing control problems at its Pirbright facility, the foot-and-mouth disease virus was inadvertently released into the environment, where it infected commercial farms before it was ultimately contained. This incident should be a cautionary tale of what can happen, even accidentally, when biohazards exist in too close a proximity to concentrations of humans and animals.

Physical barriers such as water around an island can provide an added level of protection as the experience with current facilities at the PIADC has demonstrated. The PIADC has served its purpose and has not resulted in any release of foot-and-mouth disease to the domestic animal population since its existence. While the facility is rather dated, it certainly has the advantage of being isolated by water from the mainland as an added precaution against unintentional introduction of foot-and-mouth disease into the U.S. animal population. In addition, the NBAF Draft Environmental Impact Statement acknowledges that:

- Plum Island currently performs much of the existing research and houses the existing workforce assessing potential threats to animals from foreign animal diseases and zoonotic diseases; and
- Plum Island currently fulfills a portion of the goals and mission identified for the NBAF and meets some of the NBAF criteria, including having a skilled workforce in a BSL-3 environment.
- The Plum Island Site has only minor or negligible potential adverse effects for normal operations for most of the identified resources and significant potential beneficial effects.

***These demonstrated advantages are something that can be taken advantage of by building the new NBAF facility on Plum Island.***

**Conclusions**
In summary, an outbreak of foot-and-mouth disease, from either an intentional or unintentional release of the virus, would have a catastrophic impact on the U.S. dairy industry. The potential for such an occurrence must be minimized through any means

possible. Therefore, all available resources necessary to prevent an outbreak must be provided to ensure that facilities are up-to-date with the latest modern technologies and that research can be conducted to enable government and industry representatives to contain any outbreak that should occur. NMPF prefers to maintain an upgraded or new Plum Island research facility as the new NBAF site.

Thank you again for the opportunity to provide input to this important decision. If you have any questions or need additional information, please contact me.

Sincerely,

Jamie S. Jonker
Director, Regulatory Affairs