



NATIONAL MILK
PRODUCERS FEDERATION

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

Agri-Mark, Inc.
Arkansas Dairy
Cooperative
Association
Associated Milk
Producers Inc.
Continental Dairy
Products, Inc.
Cooperative
Milk Producers
Association
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
Northwest Dairy
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.

Docket No. APHIS-2013-0097
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

July 14, 2014

Re: Notice of Availability: United States-Canada Foreign Animal Diseases Zoning Arrangement Draft Framework (Docket ID No. APHIS-2013-0097)

To whom it may concern:

The National Milk Producers Federation (**NMPF**) welcomes the opportunity to comment on the United States Department of Agriculture Animal and Plant Health Inspection Service's (**USDA-APHIS**) draft *Framework for Implementing and Maintaining the Arrangement between the Canadian Food Inspection Agency and the United States Department of Agriculture for the Recognition of Foreign Animal Disease Control and Eradication Zones (Draft Framework)*. The National Milk Producers Federation, based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. NMPF's member 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. Our members' productivity and economic security are critical components in maintaining a safe, abundant food supply for an ever-increasing world population.

NMPF is a proponent of a 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 free markets. Over the past decade, the U.S. dairy industry has experienced over 20 percent annual growth in exports now totaling more than 16 percent of domestic milk production and \$7.63 billion annually (June 2013 – May 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.

Canada is the second-largest export market for U.S. dairy products valued at \$800 million annually (June 2013 – May 2014). A highly contagious foreign animal disease (**HC-FAD**) outbreak (such as foot and mouth disease) in the U.S. or Canada could have a catastrophic economic effect on the U.S. dairy industry. NMPF applauds the forward thinking efforts of USDA working with the Canadian Food Inspection Agency to prepare for an HC-FAD outbreak and supports the Draft Framework as an effective tool to help minimize trade disruptions between our countries in the event of an HC-FAD outbreak.

The Draft Framework provides an effective operational plan for the U.S. and Canada to recognize each other's decisions to control a HC-FAD outbreak through zoning of infected- and disease-free regions. Both the U.S. and Canada have HC-FAD outbreak response plans that are based on internationally accepted zoning principles of the World Animal Health Association (**OIE**). NMPF supports the continued use of scientific approaches of the OIE for HC-FAD outbreaks for both disease containment and eradication, and for normalizing international trade.

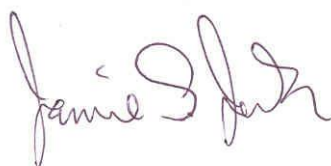
The U.S. and Canada each have plans for an HC-FAD outbreak which establish a control area(s) that consists of a central infected zone surrounded by one or more additional zones. The infected zone is the focus of disease eradication efforts, while the area(s) of control is subject to surveillance for the HC-FAD agent combined with movement restrictions on animals and other commodities that could transmit the agent. The Draft Framework allows the affected country to modify or redefine the boundaries of an area of control during the course of an outbreak following specified procedures.

This zoning arrangement outlined in the Draft Framework will facilitate continued trade between disease-free areas of the U.S. and Canada while safeguarding animal health in both countries. NMPF appreciates that the Draft Framework also establishes a structure for maintaining the arrangement over time and strategies for engaging governmental and non-governmental stakeholders (like the U.S. dairy industry) in any actions taken under the arrangement, including planning, preparedness, and response.

NMPF also encourages USDA to use this Draft Framework as a template to work with other countries that are important export markets for the U.S. dairy industry. In addition to Canada, the top export markets for U.S. dairy products are Mexico, China, Philippines, Indonesia, South Korea, and Japan representing approximately 60 percent of the total value of exported dairy products.

In conclusion, NMPF supports the Draft Framework based on internationally accepted zoning principles of the OIE as an effective tool to help minimize trade disruptions between the U.S. and Canada in the event of an HC-FAD outbreak. We welcome the opportunity to meet with you to discuss how we can work together to meet our mutual goals. If you wish to discuss any of these comments in greater detail, please contact me at (703)-243-6111 or jjonker@nmpf.org.

Sincerely,

A handwritten signature in purple ink that reads "Jamie Jonker". The signature is fluid and cursive, with the first name "Jamie" and last name "Jonker" clearly legible.

Jamie Jonker, Ph.D.
Vice President, Sustainability & Scientific Affairs