



National Milk Producers Federation

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Agri-Mark, Inc.
Associated Milk Producers Inc.
Bongards' Creameries
California Dairies, Inc.
Cayuga Marketing
Cooperative Milk Producers Association
Dairy Farmers of America, Inc.
Ellsworth 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
Mount Joy Farmers Cooperative Association
Northwest Dairy Association
Oneida-Madison Milk Producers Cooperative Association
Prairie Farms Dairy, Inc.
Premier Milk Inc.
Scioto Cooperative Milk Producers' Association
Select Milk Producers, Inc.
Southeast Milk, Inc.
Tillamook County Creamery Association
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.

September 14, 2020

U.S. Department of Agriculture
Docket No. APHIS-2020-0054
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Re: Petition to Manufacture Foot-and-Mouth Disease Vaccine in the United States
(Docket No. APHIS-2020-0054)

The National Milk Producers Federation appreciates the opportunity to provide comments to the United States Department of Agriculture, Animal and Plant Health Inspection Service (USDA-APHIS) on the *Petition to Manufacture Foot-and-Mouth Disease Vaccine in the United States* (Docket No. APHIS-2020-0054). The National Milk Producers Federation (NMPF), based in Arlington, VA, was organized in 1916 to provide a forum for dairy producers and the cooperatives they own to participate in public policy discussions. NMPF advocates policies to Congress, U.S. and foreign government agencies, industry organizations, the news media, and the public.

Foot and Mouth Disease (FMD) remains an ever-present risk to U.S. dairy farmers and their animals. Domestic and international confidence in purchasing U.S. dairy products is intimately tied to the health of our national dairy herd. An FMD outbreak would disrupt our ability to maintain, let alone expand, exports of US dairy products – about 14.5 percent of production valued at \$6.02 billion in 2019. Therefore, enhancing the FMD preparedness of great importance to U.S. dairy farmers.

In 2014, the NMPF Board of Directors endorsed a set of FMD preparedness priorities for the U.S. dairy industry. Among those priorities were modernizing the FMD vaccine bank and development of next generation FMD vaccines with production in the U.S. As a result of 2018 Farm Bill funding, USDA recently announced an initial purchase of FMD vaccine antigen as a step in modernizing the FMD vaccine bank, for which NMPF is very appreciative. This petition addresses the development of next generation FMD vaccines with production in the U.S.

NMPF supports the petition to approve the manufacture of a vaccine derived from an attenuated, leaderless strain of the FMD virus. Our support of this petition includes the manufacturer's interpretation that their product is not "live virus" of FMD for manufacturing the vaccine in the United States. The safety of manufacturing an FMD vaccine in the U.S. is paramount to protect the health of the U.S. dairy industry. The technology proposed in the petition allows for the manufacture of a protective vaccine without the risk of a vaccine-induced FMD outbreak from vaccine virus replication, shedding, and transmission.

We appreciate the opportunity to provide comments to USDA-APHIS on this petition. NMPF is committed to protect the health and welfare of our U.S. dairy herd and the economic livelihood of our dairy farmers. Approval of the petition will allow for production of FMD-LL3B3D-based vaccines that can be readily available to protect the health and welfare of our national dairy herd in the event of an FMD outbreak. If you have questions about the comments, please contact me at 703-243-6111 or jjonker@nmpf.org.

Sincerely,

A handwritten signature in black ink that reads "Jamie Jonker". The signature is written in a cursive style with a large, stylized initial "J".

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