

**June 9th, 2005 BSE Roundtable in Minneapolis, Minn.
Opening Remarks by Bill Bullard, R-CALF USA CEO**

Mr. Secretary and distinguished roundtable members, I'm Bill Bullard, CEO of R-CALF United Stockgrowers of America. I'm here today representing over 18,000 independent U.S. cattle producers who understand the long term viability of our industry is dependent completely upon our ability and commitment to ensure the health and safety of our cattle herds and our consumers.

If we ignore the warning signs surrounding BSE, as countries like Germany did, Japan did, and Canada did – and as R-CALF believes USDA has done of late -- we risk the same consequences these and other countries have experienced. Such a fate is unnecessary and avoidable. Canada must be required to address its BSE problem more completely before the U.S. border with Canada can be reopened.

Respected U.S. scientists Dr. Linda Detwiler, Dr. Paul Brown, and Dr. Bob Rohwer who have all worked in the field of transmissible spongiform encephalopathies for decades, wrote the following comment in an August 13, 2004 memorandum to the FDA regarding our present BSE challenge:

“We in North America could do this experiment all over again, waiting for each new warning before adding more stringency to our control measures, or we can benefit from the British experience and take decisive measures now to arrest any further development of the underlying epidemic that is implicit in the two BSE cases discovered to date.”

These scientists wrote this before Canada identified two more cases in January 2005.

Within the context of USDA's proposal to resume trade with countries with BSE, particularly Canada, R-CALF USA offers three basic tenets:

1. We believe the goals of international trade are enhanced when trade is subject to strict safety standards;
2. Comprehensive research and applied science have demonstrated the essential combination of interlocking safety standards that have proven most effective in reducing the risks associated with BSE; and
3. The USDA Final Rule ignores and dismisses these essential scientific safety standards, effectively relegating both the U.S. cattle industry and U.S. consumers to defend itself from a 21st Century threat using 20th Century technology.

We know BSE exists in Canada. We also know this disease is pernicious, long-term, and difficult to control. This is not a kind of disease our industry is used to dealing with.

The ongoing experiences in Europe have clearly demonstrated that control measures known to be effective in reducing the incidence and spread of BSE have NOT yet eliminated the BSE risk. Despite high levels of confidence in the effectiveness of measures like import restrictions, feed

bans, surveillance programs, and removal of specified risk materials, new cases, while reduced in frequency, continue to be detected.

Specifically, the European experience and the latest scientific research and recommendations tell us that import restrictions on certain Canadian products are essential, that Canada's feed ban is inadequate, that Canada's surveillance program is insufficient, and that Canada's SRM removal policy is deficient.

The USDA Final Rule falls well short of safe. The BSE mitigation measures that USDA has concluded are sufficient to justify imports from Canada and other countries where BSE is known to exist will reduce the risk of BSE transmission. But there is no evidence, either from the laboratory or from practical experience, to show that the measures are sufficient. In fact, the scientific evidence is to the contrary. The more we learn about BSE, the more we find that the most comprehensive measures available are the minimum that should be applied. USDA's own experts, along with FDA and other scientists devoted to BSE research, have urged more extensive measures be taken. Where, as here, both the health and safety of the single largest segment of American agriculture and of the American consumer is at stake, it is inappropriate to use politics and the economic interests of a relative few to short-change science-based protection.

This rule must be rewritten. A new rule must be premised on the objectives of establishing strict safety standards for imports from any country where BSE exists or where BSE cannot be ruled out.

R-CALF has come up with a word to help folks remember what we think USDA and Canada need to do before we resume trade in live cattle and beef. The word is STRICT, which stands for:

S – Stop the spread of BSE by eliminating all pathways of the BSE agent.

T – Test enough cattle to a) determine the prevalence of BSE, b) determine if the disease is waning or increasing, and c) monitor the effectiveness of Canada's feed ban.

R- Remove all specified risk materials as is done in Europe and elsewhere. SRMs must be expanded to include the entire intestine and mesentery of cattle over 12 months of age.

I – Implement Country-of-Origin Labeling to protect the U.S. cattle industry in the event that additional BSE cases are discovered in Canada and to afford U.S. consumers the right to choose between U.S. and Canadian beef.

C – Close feed ban loopholes and ensure feed ban compliance. Blood, poultry litter, plate waste, and all mammalian tissues need to be banned from the Canadian feed system, and prohibited materials must be handled in dedicated plants.

T – Then, and only then, resume trade with Canada.

Science argues for increasing standards, not lowering them, as USDA's Final Rule attempts to do.