

March 4, 2014

The Honorable John Barrasso
United States Senate
Washington, D.C. 20510

The Honorable Tim Johnson
United States Senate
Washington, D.C. 20510

The Honorable Mike Enzi
United States Senate
Washington, D.C. 20510

The Honorable Jon Tester
United States Senate
Washington, D.C. 20510

The Honorable Heidi Heitkamp
United States Senate
Washington, D.C. 20510

Dear Senator Barrasso, Senator Johnson, Senator Enzi, Senator Tester, and Senator Heitkamp:

We, the undersigned organizations, are grateful that you joined the January 23, 2014 letter requesting U.S. Agriculture Secretary Tom Vilsack to extend the comment period on the December 23, 2013 proposed rule by the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Program (APHIS) that would allow the importation of fresh beef from 14 states in Brazil.

As your letter makes clear, it is possible that the proposed rule would result in the importation into the United States of foot-and-mouth disease (FMD) from fresh beef imports from Brazil. We share your concern regarding the proposed rule and now seek your help in assessing the extent to which USDA may be systematically dismantling disease protection measures critical to protecting U.S. livestock industries from the introduction of FMD and perhaps other foreign animal diseases.

We are concerned that APHIS is disregarding its responsibilities under the Animal Health Protection Act (AHPA)¹ that authorizes the Secretary of Agriculture to:

“... prohibit or restrict...the importation or entry” of animals and animal products “if the Secretary determines that the prohibition or restriction is necessary to prevent the introduction into or dissemination within the United States of any pest or disease of livestock.”

¹ 7 U.S.C. § 8301, et seq.

The implementing regulations for the AHPA make clear that the Secretary has already determined that prohibitions against the importation of certain animal products are necessary to safeguard the United States from the introduction of FMD. In particular, 9 CFR §94.1, states, in part:

“(b) The importation of any ruminant or swine or any fresh (chilled or frozen) meat of any ruminant or swine that originates in any region where rinderpest or foot-and-mouth disease exists, as designated in paragraph (a) of this section, or that enters a port in or otherwise transits a region in which rinderpest or foot-and-mouth disease exists, is prohibited:”

As discussed below, we seek your help to accomplish two measures that we believe are necessary to first determine if APHIS is in compliance with the aforementioned AHPA requirement and, second, whether APHIS’ proposed rule would constitute a violation of that statute.

As a first measure we seek your help in calling for an immediate update to the 2003 Final Report for the Animal Disease Risk Assessment, Prevention, and Control Act of 2001 (PL 107-9).² This 2003 Final Report made clear that the more stringent disease protection protocols in place at the outset of the 21st Century were necessary to prevent the introduction of FMD into the United States. APHIS’ newly proposed rule, however, represents a radical and seemingly unjustified departure from those preexisting disease protection protocols. We believe that Congress and the public deserve to know why APHIS no longer considers the protocols contained in the 2003 Final Report to be necessary to prevent an outbreak of FMD in the United States.

As a second measure, and pursuant to the report in the January 2014 edition of the respected dairy publication, *The Milkweed*,³ that revealed that data maintained by the USDA Foreign Agriculture Service (FAS) show that the United States imported approximately 57,000 pounds of fresh lean beef trimmings from China in each of the years 2012 and 2013 – despite the fact that beef imports from China are prohibited under U.S. law because FMD is endemic in China – we seek your help in calling for an immediate investigation to determine if U.S. import controls have been undermined, either deliberately or inadvertently, and, if so, what corrective measures are needed to prevent the introduction of high-risk products from FMD-affected countries.

The USDA responded to *The Milkweed*’s January 2014 disclosure by modifying its trade data to reflect that the imports previously recorded as arriving from China during 2012 and 2013 are now recorded as having arrived from Uruguay. However, the subsequent February 2014 edition of *The Milkweed* further discloses that USDA records also show that in 2012 more than

² Final Report for the Animal Disease Risk Assessment, Prevention, and Control Act of 2001 (Public Law 107-9), January 2003 (hereafter “Final Report”), available at <http://www.r-calfusa.com/BSE/030101-AttachmentA.pdf>.

³ See Beef Imports from China Pose Serious FMD Threat to U.S. Livestock Industry, Jim Eichstadt, *The Milkweed*, Issue No. 414, January 2014, at 8-9 (hereafter “The January Milkweed Article”), attached hereto.

55,000 pounds of frozen pork was imported from Colombia, which, like China, lacks FMD-free status and from which imports of fresh (chilled or frozen) beef or pork is prohibited.⁴

An Update Is Needed to the Final Report for the Animal Disease Risk Assessment, Prevention, and Control Act of 2001

The Final Report to Congress for the Animal Disease Risk Assessment, Prevention, and Control Act of 2001 (Final Report) asserted that an “important part of the U.S. safeguarding strategy is to exclude from entry those animals and animal products that pose a risk of FMD . . .”⁵ The Final Report cautioned Congress regarding the ease at which FMD could enter the United States by stating, “A single infected animal or one contaminated sausage could carry the virus to American livestock.”⁶

To assuage Congress’ FMD concerns, the Final Report declared that “APHIS has regulations in place to restrict imports of livestock, [] [and] livestock products . . . coming from countries the United States does not recognize as free of FMD . . .”⁷ Also, and of particular concern, is the Final Report’s foreboding discussion regarding countries that have to “resort to vaccination to control an outbreak [of FMD] . . .” (emphasis added).⁸ “[V]accinated animals can become carriers without showing signs of the disease,”⁹ warns the Final Report, which further concluded that sheep were discovered to be carriers that exhibited limited vesicular signs of FMD during the devastating outbreak that occurred in the United Kingdom in 2001.¹⁰

It appears that APHIS now plans to eliminate key measures it said were critical to prevent the introduction of FMD into the United States. For example, APHIS’ proposed rule would reverse its prior safeguarding strategy of excluding imports from countries that pose a risk of FMD. Indeed, the proposed rule indicates that Brazil remains at risk for an outbreak of FMD “as long as FMD is endemic in the overall region in South America.”¹¹ But, the risk is even more acute because not only is FMD endemic in other South American regions, it is, in fact, endemic in northern Brazil.¹² Further, APHIS acknowledges the additional risk that “beef destined for the United States could originate from or be commingled with animals or animal products from affected neighboring areas.”¹³

⁴ See U.S. Allows Dairy Product Imports from Many Countries with Foot-and-Mouth Disease, Jim Eichstadt, *The Milkweed*, Issue No. 415, February 2014, at 8-10 (hereafter “The February Milkweed Article”), attached hereto.

⁵ Final Report, at 18.

⁶ *Id.*, at 6.

⁷ *Id.*, at 18.

⁸ *Id.* at 3.

⁹ *Id.*

¹⁰ *Id.*, at 11.

¹¹ 78 Fed. Reg., 77,373, col. 3.

¹² See Risk Analysis: Foot-and-Mouth Disease (FMD) Risk from Importation of Fresh (Chilled or Frozen), Maturated, Deboned Beef from a Region in Brazil into the United States, APHIS, December 2013 (hereafter “Risk Analysis”), at 65 (stating that FMD is endemic in the northern part of Brazil).

¹³ *Id.*, at 70

The proposed rule also contravenes the Final Report's cautionary discussion regarding countries that "resort" to vaccination to control FMD. The 14 Brazilian states that APHIS seeks to certify as eligible to export fresh beef to the U.S. are states that had to "resort" to vaccination to control their outbreaks of FMD. The proposed rule states that "[v]accination of cattle and buffalo is mandatory in the proposed export region."¹⁴ It further states that the "coverage," *i.e.*, the percentage of cattle and buffalo actually vaccinated, ranges from 76 to 99.9 percent in the export region.¹⁵ Thus, in addition to the fact that nearly one-quarter of the cattle and buffalo were known not to be vaccinated in one of the 14 Brazilian states included in the proposed rule, APHIS also acknowledges that beef carrying the FMD virus could be exported to the U.S. due to the possibility that undetected FMD-infected cattle might be missed on ante-mortem inspection.¹⁶

The foregoing discussion reveals that APHIS' proposed rule represents a radical departure from the tried and true disease protection protocols of the past. It also reveals that APHIS is undertaking this rule change without the benefit of ratification by Congress after APHIS had – just a decade before – given Congress written assurances that it would not knowingly expose the United States cattle and sheep industries to an unnecessary and avoidable risk of introducing FMD into the United States, although this is clearly APHIS' intent under its proposed rule. The inconsistencies between disclosures by Brazil, reports by APHIS and the findings of the World Organization for Animal Health (OIE) erode our confidence in the safety of beef imports from countries with a history of FMD presence. Therefore, we urge you to require USDA to suspend consideration of its proposed rule until after it has provided Congress with an update of the 2003 Final Report so Congress can assess whether APHIS is justified in extinguishing the commitments and assurances made to Congress just a decade ago.

An Immediate Investigation Is Needed to Determine if U.S. Import Controls have been Undermined

The disclosure in the January edition of *The Milkweed* of FAS data indicating that the United States had unlawfully allowed beef to be imported from FMD-affected China during each of the past two calendar years was alarming, and USDA's recent actions of modifying that data so it now reflects that such imports actually originated in Uruguay, raises additional concerns regarding whether USDA has adequate controls in place to both prevent unlawful imports as well as to report unlawful imports when they occur.¹⁷ The January edition of *The Milkweed* stated that "[t]he FAS Global Agricultural Trade System (GATS) database reports imports of lean beef trimmings from China totaling 57,134.4 lbs. in 2012 and 57,438.6 lbs. during the first 11 months of 2013."¹⁸

¹⁴ 78 Fed. Reg., 77,372, col. 3.

¹⁵ *Id.*

¹⁶ *See* Risk Analysis, at 72.

¹⁷ *See, e.g.*, Countries/Products Eligible for Export to the United States, USDA Food Safety and Inspection Service (FSIS), updated September 20, 2013 (showing that neither China nor Colombia are authorized to export beef or pork to the United States), available at http://www.fsis.usda.gov/wps/wcm/connect/4872809d-90c6-4fa6-a2a8-baa77f48e9af/Countries_Products_Eligible_for_Export.pdf?MOD=AJPERES, last visited February 4, 2014.

¹⁸ The January Milkweed Article, at 8.

In response to *The Milkweed's* January disclosure, the USDA issued an erratum on February 11, 2014 stating that it had revised the 2012 and 2013 reports indicating that the United States has unlawfully imported beef from Mainland China and those imports are now attributed to Uruguay.¹⁹ However, as indicated in *The Milkweed's* February disclosure:

The FAS trade data also show that the U.S. imported 55,132.60 pounds of pork ("Frozen Meat Of Swine, Other Than Retail Cuts, Nesi" under U.S. tariff code 02032940) from Colombia, another FMD-infested country, during 2012. (Emphasis in the original.)²⁰

The potential for FMD to devastate U.S. livestock production is paralleled by a new deadly virus now devastating U.S. hog producers: "PEDV" (Porcine Epidemic Diarrhea Virus). PEDV was first identified in the U.S. in April 2013. In less than one year, PEDV has killed several million swine. PEDV is virtually 100% fatal for infected swine weighing less than 40 pounds. PEDV's DNA traces back to origins in China, according to Wisconsin State Veterinarian Dr. Paul McGraw.

We believe an immediate, congressional investigation is warranted to determine if U.S. import controls have been undermined, either deliberately or inadvertently, and, if so, what corrective measures are needed to prevent the introduction of FMD into the United States from FMD-affected countries.

The aforementioned circumstances strongly suggest that, at the very least, the United States needs to begin strengthening, not weakening, its FMD safeguards. Unfortunately, these same aforementioned circumstances strongly suggest that USDA is leading the United States in the opposite direction and may, in fact, be in direct violation of the United States Animal Health Protection Act.

Please let us know how we might assist you in directing the USDA to update its decade-old Final Report for the Animal Disease Risk Assessment, Prevention, and Control Act of 2001 (PL 107-9) and in initiating a congressional investigation into USDA's reported beef imports from FMD-affected China and Colombia.

Sincerely,

Alabama Contract Poultry Growers
American Agriculture Movement
American Grassfed Association
Buckeye Quality Beef Association (Ohio)
California Farmers Union

¹⁹ See Beef and veal: Annual and cumulative year-to-date U.S. trade (carcass weight, 1,000 pounds), USDA Economic Research Service, available at <http://www.ers.usda.gov/data-products/livestock-meat-international-trade-data.aspx>, last visited February 20, 2014.

²⁰ The February Milkweed Article, at 8.

Cattle Producers of Louisiana
Cattle Producers of Washington
Center for Food Safety
The CJD Foundation
Coalition for a Prosperous America (CPA)
Colorado Independent CattleGrowers Association
Contract Poultry Growers Association of the Virginias
Dakota Rural Action
Dewitt County Farm Bureau, TX
Every One At The Table For Health (EAT4HEALTH)
Family Farm Defenders
Farm & Ranch Freedom Alliance
Farms Not Arms (California)
Food & Water Watch
Independent Beef Association of North Dakota (I-BAND)
Independent Cattlemen of Nebraska
Independent Cattlemen of Wyoming
Institute for Agriculture and Trade Policy (IATP)
International Texas Longhorn Association
Intertribal Agricultural Council
Kansas Cattlemen's Association
Massey Road Cattle Producers (Iowa)
The Milkweed
Missouri Farmers Union
Missouri Rural Crisis Center
Missouri's Best Beef Co-Operative
National Association of Farm Animal Welfare
National Family Farm Coalition
National Farmers Organization
National Farmers Union
National Latino Farmers and Ranchers Trade Association
Nebraska Farmers Union
Nebraska Women Involved in Farm Economics
Nevada Live Stock Association
New England Farmers Union
North Country Sustainability Center, Inc.
Northern New Mexico Stockman's Association
Northern Wisconsin Beef Producers Association
Ohio Farmers Union
Organization for Competitive Markets (OCM)
PCC Natural Markets
Powder River Basin Resource Council
Progressive Agriculture Organization (Pro-Ag)
R-CALF USA
Rural Coalition/Coalición Rural

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Socially Responsible Agricultural Project (SRA Project)

South Dakota Stockgrowers Association

Texas-Mexico Border Coalition

Tri-State Wool Marketing Association

Western Organization of Resource Councils

Beef Imports from China Pose Serious

Foot-and-Mouth Disease:

USDA trade data have raised alarms that beef from FMD-infested China was illegally imported to the U.S. in 2012 and 2013.

by Jim Eichstadt

USDA data show that Chinese beef imports entered the U.S. during 2012 and 2013 – in violation of a federal ban on such imports due to deadly Foot-and-Mouth Disease (FMD) in China. If the reports generated by the Foreign Agriculture Service's (FAS) online trade database is accurate, the beef imports from China could pose significant risks to domestic livestock producers, the nation's food supply, and the U.S. economy.

The FAS Global Agricultural Trade System (GATS) database reports imports of lean beef trimmings from China totaling 57,134.4 lbs. in 2012 and 57,438.6 lbs. during the first 11 months of 2013. The Chinese beef was imported under U.S. Harmonized tariff code 02023050, a category that includes "Bovine Meat Cuts, Boneless, Not Processed, Frozen."

According to the GATS data, the beef imports from China were valued at \$179,000 in 2012 and \$169,000 in 2013. The data report also shows significant imports of non-bovine "Meat, Offal, Other" from China in recent years, a development that should concern consumers of certain cheap "mystery meat" products in the U.S. (See data table on page 9.)

FMD persists in Asia & beyond

Questions about Chinese beef imports entering the U.S. surface as international animal health authorities confirm that FMD persists as a major problem in China and other Asian countries, Russia, Africa, and South America. A May 2013 report by the United Nations Food and Agriculture Organization confirmed outbreaks of FMD in cattle, pigs, and sheep in several regions of China last year. Reports published by the U.S. Centers for Disease Control noted numerous strains of FMD outbreaks in China in 2012 and much of the previous decade.

FMD is undermining China's efforts to increase milk production to meet rising internal demand. Ironically, FMD-related milk production losses in China, India, and South Korea may be a factor in sustaining current high global dairy prices. Agriland.ie, an Irish Web site, said in a December 30, 2013 news story: "A 20 per cent drop in China's milk production is reported to have taken place in part due to FMD. This, combined with high feed prices and high beef prices, is believed to have led to the slaughtering of around two million cows." China's milk output is down double-digits.

The FMD concerns also come as USDA's Animal and Plant Health Inspection Service (APHIS) – the lead agency responsible for safeguarding the health of U.S. livestock herds from foreign disease – has come under increased scrutiny. Citing recent agency decisions, beef industry critics charge that APHIS is ignoring or weakening its own livestock protection and food safety rules (see below).

"An error" or "a pattern of denial"??

A USDA employee was quick to dismiss the Chinese beef import numbers as "an error or, at best, misleading" due to possible tariff coding or data entry errors. But Bill Bullard, a veteran beef industry leader who has reviewed the FAS data and the official's response, said such denial fits a familiar pattern at USDA.

Bullard, CEO of R-CALF USA – a vocal advocacy group for cattle producers – said the denial is consistent with USDA's past history of covering illegal beef imports and violating its own rules to protect the meat packing industry. R-CALF (Ranchers-Cattlemen Action Legal Fund, United Stockgrowers of America), a U.S. grass-roots cattle producers' group, has long fought for strict enforce-

ment of import sanitation rules, country-of-origin meat labeling, and other livestock-related concerns.

USDA's denial:

First, here is the USDA employee's response when recently questioned about the regular, monthly Chinese beef import data:

"I actually think the data you pulled is an error or, at best, misleading. First, beef imports from China – not allowed. Thus, 'not possible' trade. There are a few things that could have happened. This could be returned U.S. product (not allowed either by China!) which SHOULD have been brought in under a special HS code in Chapter 99 (Not Chapter 2). It also could be "allowed origin" (such as AU or NZ) product that transshipped via China and the origin was misrepresented. It also could have been not beef at all and someone entered the wrong HS code. All of these are scenarios I have seen in the past," the USDA employee said.

Although that employee estimated the ban on Chinese beef imports had been in effect since 2003, an FAS spokesperson separately could not confirm the exact date or other details of the ban

(Author's note: The employee's exemplary history of providing helpful and timely assistance suggests that this public servant is acting in good faith on this issue and is accurately conveying the official USDA "party line" handed down from above.)

R-CALF's response:

"R-CALF USA is deeply troubled by USDA's own data that show the United States has been importing beef from China in 2012 and 2013. Foot-and-Mouth Disease (FMD) is endemic in China and beef imports from that country are strictly prohibited," Bullard said. He further elaborated:

"Unfortunately, we cannot rely on USDA's insistence that this data is erroneous. This is because USDA has a long history of violating its own food safety- and animal health-related import restrictions. For example, in 2004 USDA told us that the data we discovered showing that USDA was

unlawfully allowing imports of beef from Canada after such beef was prohibited due to the discovery of mad cow disease in Canada was a mistake. We filed a lawsuit against USDA at the time and won an immediate injunction. USDA was caught red-handed and did not contest our injunction. We later found out from internal USDA documents that USDA was allowing these unlawful imports simply because their meatpacker friends wanted them to.

"Long before that incident, we discovered that USDA data showed that we were importing beef from Europe, which was also strictly forbidden because of the widespread outbreaks of mad cow disease. USDA told us at the time that their data was erroneous and that imported products had been miscoded," Bullard continued.

"After this incident, there were confirmed reports of cattle being unlawfully imported into the United States from Canada because they exceeded the mad cow disease-related age limit that USDA had put in effect to protect the U.S. cattle herd from the introduction of mad cow disease," he concluded.

FMD: deadly and highly contagious

Beef imports from countries that lack FMD-free status are banned for good reason: They pose a very significant threat of contamination to U.S. producers of dairy, beef, and other livestock, The Foot-and-Mouth Disease virus (*Aphthae epizooticae*) is among the most deadly and contagious known livestock diseases. FMD spreads rapidly and is lethal to cloven-hoofed animals, including cattle, swine, sheep, goats, and bison, as well as over 70 wildlife species including deer, antelope, hedgehogs, elephants, and armadillos.

FMD is not always fatal in infected animals. Symptoms vary by species. The disease causes significant loss of milk production in dairy cows, prolonged weight loss for adult animals, abortion in pregnant animals, lameness, anorexia, depression and other symptoms. An Iowa State University bulletin notes that:

"Though most animals eventually recover from FMD, the disease can lead to myocarditis

Foot & Mouth Disease (FMD)

(*Aphthous fever, Aftosa, Epizootic aphthae*)

—from *The Merck Veterinary Manual*

"An acute, highly communicable disease chiefly confined to cloven-footed animals. Cattle, swine, sheep, goats, buffalo (including the African buffalo). Bison, yak, camel, dromedary, deer, reindeer, moose, elk, North American deer, llama, chamois, alpaca, vicuna, giraffe, elephant, most antelope spp., mole, vole, rat, water rat, coypu and hedgehog are generally considered the natural domestic and wild hosts. Some wild animals develop only minimal clinical signs but nevertheless, serve as important reservoirs of infection. ... Man, despite his frequent and sometimes intensive exposure, becomes infected only occasionally, when ill-defined predisposing factors are encountered.

"... As a result of the strictest sanitary measures, the disease has not become established in North America, Australia or New Zealand.

"... It [the FMD virus] is present in the fluid and tissues of the vesicles, as well as in the blood during the febrile stages; at times it is demonstrable in the saliva, milk, feces and urine of living animals or in the meat, bone marrow and lymph nodes of dead animals. Exposed

or recovered cattle may carry the virus, principally as an inapparent pharyngeal infection, but such carriers have not been proved to transmit the disease to susceptible animals.

"The disease spreads as a result of contact with infected animals, fomites or vehicles; the use of infected semen has been suggested as a possible cause of outbreaks. Flocks of birds may be mechanical vectors, as may rodents, flies and other arthropods. There is good evidence that FMD has been spread by the primary movement of milk from farms to dairies and to consumers. The virus is excreted in the milk during the prodromal phase and pasteurization may not be fully effective. FMD virus is also excreted in the exhalations and may survive as an aerosol for several hours.

"... Mortality rarely exceeds 6% in any species but occasionally it may exceed 50%, as a result of an apparent predilection of certain strains for muscular tissues, and for myocardium in particular."

Source: *The Merck Veterinary Manual*, 5th Edition – 1979.

FMD Threat to U.S. Livestock Industry

United States Department of Agriculture
Foreign Agricultural Service

Area/Partners of Origin January - December
And General Commodities Imported Cumulative To Date Quantities/Values in Thousands of Dollars

Partner	Product	UOM	2012		Jan - Nov 2012		Jan - Nov 2013	
			Value	Qty	Value	Qty	Value	Qty
China	02023050 - Bovine Meat Cuts, Boneless, Not Processed, Frozen,	Lbs.*	179	57,134.40	179	57,134.40	169	57,438.60
Grand Total		Lbs.*	179	57,134.40	179	57,134.40	169	57,438.60

Source: FAS Global Agricultural Trade System, US. Census Bureau Trade Data

(inflammation of the heart muscle) and death, especially in newborn animals. Some infected animals remain asymptomatic, but they nonetheless carry FMD and can transmit it to others.”

The FMD virus is easily and quickly transmitted through animal-to-animal contact, by air and water, through contact with clothing, equipment, feed, and other objects, by wild animals, and through infected meat.

Chilled or frozen meat – the forms common in global trade – is an ideal carrier of FMD: “At temperatures below freezing point, the virus is stable almost indefinitely,” according to Australia’s 2012 veterinary emergency plan for FMD.

The difficulty of containing an FMD outbreak is compounded by the fact that the virus infects many species of wildlife that move freely and uncontrollably across state and national borders. Here’s why the risk of FMD contamination from China is particularly acute:

- China is surrounded by other FMD-infected countries.

- China exports extensively to FMD-free countries. The vast movement of goods and people between China and the U.S. provides ample opportunities for the FMD virus to spread. This includes U.S. university Cooperative Extension Service experts who travel back and forth while helping China improve its foundering dairy production.

- China is a food safety and livestock health disaster. A long list of severe livestock and poultry diseases is found in China. China’s food processing trade is world-renowned for its lack of integrity. And China’s food safety regulators seem to reengaged in a losing game of “wack a mole” as they try to keep up with contagious food animal diseases and unscrupulous food processors.

FMD is top U.S. bioterrorism threat

The economic costs of FMD are enormous. Outbreaks typically require extensive quarantines followed by the destruction and incineration or burial of thousands – or even millions – of infected animals. An outbreak of FMD in the U.S. could infect millions of animals, cost untold billions of dollars, threaten national food security, and wreak economic havoc on the national economy. No wonder the U.S. Department of Homeland Security in March 2007 designated Foot and Mouth Disease as the nation’s top bioterrorism threat.

The U.S., which has FMD-free status, had nine FMD outbreaks between 1870 and 1929, according to Wikipedia.com. The 1929 outbreak in California “originated in hogs that had eaten infected meat scraps from a tourist steamship that had stocked meat in Argentina,” Wikipedia said. Argentina continues to lack FMD-free status.

China: an open corridor to Wisconsin

The threat of FMD contamination is a real nightmare for top dairy states like Wisconsin.

According to a *Wisconsin State Farmer* story published December 31, 2013, State Veterinarian Paul McGraw told the Wisconsin ag board meeting in December that a specific strain of Porcine Endemic Diarrhea – another highly contagious disease – from China had entered Iowa and Wisconsin through an open transmission corridor. A key excerpt of that story:

“This is kind of an eye opener. It got here

through a corridor and we presume that corridor is still open.” That corridor could lead to countries that also have foot and mouth disease (FMD) and classical swine fever. “This is what keeps state veterinarians up at night,” he said.

Lessons from other countries

Other smaller developed nations have suffered heavy losses from foot-and-mouth disease outbreaks in the past decade. Recent FMD outbreaks in developed countries include:

United Kingdom: A 2001 outbreak involved an estimated 2,000 cases resulted in the loss of 7 million head of cattle and hogs and inflicted estimated economic losses of \$13 billion. The resulting civic disruption included the postponement of general elections and the cancellation of sporting events and other activities. Two separate outbreaks in 2007 were limited to local areas through quarantine and were less serious.

In the FMD outbreak in England and western Europe in 2001, at least one human death was attributed to contraction of FMD.

A far greater human toll from England’s FMD outbreak 13 years ago were numerous suicides of farmers whose entire herds were depopulated.

Japan: A 2010 outbreak resulted in the destruction of over 211,000 head of cattle and hogs at an estimated cost exceeding \$3.5 billion. This was Japan’s second FMD outbreak in a decade. Japan’s famous wagyu Kobe beef industry was hammered by that FMD outbreak.

South Korea: A 2010-11 outbreak led to the destruction of 3.48 million animals. The U.S. Centers for Disease Control reported that 151,425 cattle, 3,318,299 pigs, 8,071 goats, and 2,728 deer were buried at 4,583 burial sites throughout the country. South Korea, notably, has a Free Trade Agreement with the U.S. Human traffic from China is believed to have been the source of the South Korean FMD outbreak in 2010-2011.

APHIS: a threat to U.S. animal health?

USDA has a long history of acting contrary to the best interests of the U.S. livestock industry. Many top USDA officials have close ties to the National Cattlemen’s Beef Association, a conservative industry trade group dominated by large meat packers. The largest U.S. meat packer is Brazil’s JBS, a vertically-integrated behemoth that has its own captive cattle supply and operates large feedlots with a combined feeding capacity of 980,000 head in six states and Canada that supply its many packing plants.

Given the unduly large influence of the meat packing lobby at USDA, it came as no surprise that R-CALF and other producer-oriented cattle groups question APHIS’ commitment to its mission. (“To protect agricultural health, APHIS is on the job 24 hours a day, 7 days a week working to defend America’s animal and plant resources from agricultural pests and diseases,” according to the agency’s Web site.)

Given the agency’s mixed track record in protecting U.S. livestock in the era of rapid globalization, industry critics question whether APHIS is capable of – or even interested in – carrying out its stated mission.

APHIS actions raise questions

Recent APHIS actions further undermine the agency’s credibility on livestock safety:

On December 20, 2013, APHIS announced a proposed rule that would allow certain beef imports

from 14 states of Brazil, one of several South American countries infected with FMD. The proposed rule uses the dangerous free-trade practice of “regionalization” to do an end-run around the existing FMD quarantine. “Regionalization” allows countries infested with FMD and other deadly diseases to bypass animal health safeguards by allowing exports of livestock products from areas of the country that are not directly infected but still at risk.

The APHIS proposal appears tailor-made for JBS, the giant Brazilian-based meat packer interested in importing cheap beef from Brazil. (In opposing the APHIS plan, R-CALF noted that Brazil’s cattle population of 183 million head is more than twice as large as the U.S. cattle herd.)

“The proposed regulation changes would allow the importation of chilled or frozen beef while continuing to protect the United States from an introduction of foot-and-mouth disease (FMD),” APHIS said, in a classic case of bureaucratic “double speak.” APHIS then admitted its proposal posed several key risks to the U.S. beef industry:

- **FMD contamination is possible:** “APHIS concluded that as long as FMD is endemic in the overall region in South America, there is a risk of reintroduction from adjacent areas into the proposed exporting region.”

- **Brazilian beef imports would reduce U.S. cattle prices:** “The fall in beef prices and resulting decline in U.S. production would translate into reduced returns for producers in the livestock and beef processing sectors.”

APHIS Veterinary Services in April 2011 recommended approval of Japan’s request to be designated as an FMD-free country and allow the immediate resumption of certain beef imports from Japan. The plan, which applied to whole cuts of boneless beef imports, came shortly after Japan’s 2010 FMD outbreak.

Beef imports from Argentina, another FMD-infested South American country, were allowed to resume in July 2000 under another APHIS regionalization scheme. Argentina confirmed a new outbreak of FMD in August 2000, just days before the APHIS’ regionalization rule took effect. Despite the FMD outbreak, APHIS concluded that regionalized Argentine beef imports presented no risk to U.S. livestock producers.

We’ve got a problem – Now what do we do?

It is time for decisive action. We need to view the animal health threat as potential “food 9/11” waiting to happen. U.S. livestock must be protected from Foot-and-Mouth Disease, “mad cow” disease and other serious outside perils. USDA’s trade data showing beef imports from China raise many questions that remain unanswered.

Given its history of denial and flawed actions, APHIS in its current form cannot be trusted to enforce animal health and food safety safeguards. The U.S. Government is failing its basic duty of protecting the American people from threats to our national food supply and economy. Livestock producers and groups must join with R-CALF in demanding proper enforcement of animal health and food safety rules.

Congress must set aside its partisan bickering, stop powerful meatpacker interests from dictating national policy, and demand that border protections be strengthened and enforced. Then – and only then – can the American people have confidence that our national food supply is safe and secure.

U.S. Allows Dairy Product Imports from Member Countries'

First beef, now dairy products and pork: the U.S. imports animal products from 40 Foot-and-Mouth Disease countries

by Jim Eichstadt

U.S. livestock producers, beware! Beef is not the only imported animal product entering the U.S. – in many cases illegally – from countries infested with highly contagious Foot-and-Mouth Disease (FMD). USDA trade data show that, during the past four years, the U.S. imported pork from Columbia and a wide range of dairy products from some 40 countries that lack official FMD-free status, according to both the U.S. and global agencies that monitor animal diseases.

The imports of beef, pork, and some dairy products from infected countries pose a serious risk of transmitting the foot-and-mouth virus to U.S. livestock herds, including beef and dairy cattle, hogs, sheep, and goats.

The January 2014 issue of *The Milkweed* reported that beef imports apparently entered the U.S. illegally during 2012 and 2013 from China, a country with a long history of FMD outbreaks. The report cited USDA Foreign Agricultural Service trade data showing that imports of “Bovine Meat Cuts, Boneless, Not Processed, Frozen” (entered under U.S. tariff code 02023050) totaled 57,134.40 pounds during 2012 and 57,438.60 pounds during the first 11 months of 2013. China reported active outbreaks of FMD in livestock herds throughout the country during the period the beef imports occurred.

The FAS trade data also show that the U.S. imported 55,132.60 pounds of pork (“Frozen Meat Of Swine, Other Than Retail Cuts, Nesi” under U.S. tariff code 02032940) from Columbia, another FMD-infested country, during 2012. Like cattle, hogs are highly susceptible to foot-and-mouth disease. The FMD virus is easily transmitted by pork meat and remains viable for long periods of time in chilled and frozen pork.

Federal law bans FMD imports

Federal law prohibits the importation of beef and many other animal products from countries that are not listed as free from FMD – along with “mad cow” disease, rinderpest, and other serious animal diseases – due to the serious risks of contamination to U.S. livestock herds.

The federal ban on imports of animals and animal products from countries infested with FMD is authorized by The Animal Health Protection Act of 2001 (7 U.S.C. § 8301, et seq.) authorizes the Secretary of Agriculture to:

“... prohibit or restrict...the importation or entry” of animals and animal products “if the Secretary determines that the prohibition or restriction is necessary to prevent the introduction into or dissemination within the United States of any pest or disease of livestock.”

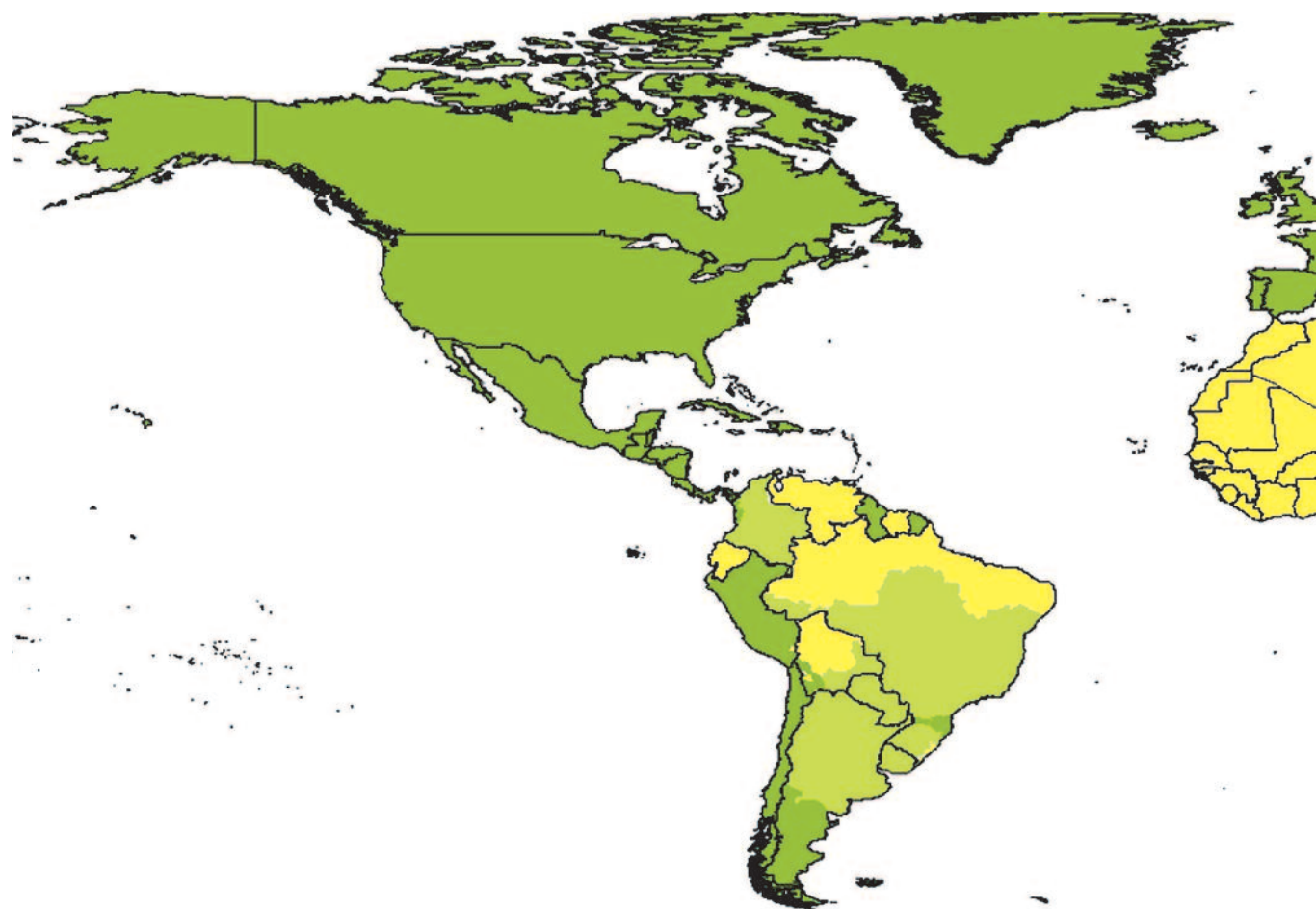
The prohibition on imports from countries that lack FMD-free status is further detailed in federal regulations. These rules, under 9 CFR §94.1, state, in part:

“(b) The importation of any ruminant or swine or any fresh (chilled or frozen) meat of any ruminant or swine¹ that originates in any region where rinderpest or foot-and-mouth disease exists, as designated in paragraph (a) of this section, or that enters a port in or otherwise transits a region in which rinderpest or foot-and-mouth disease exists, is prohibited: (See sidebar story on page 10.)

Dairy imports totaled \$205 million

A further search of the FAS Global Agricultural Trade System database in early February reveals another disturbing development: **More than \$205 million worth of dairy products from some 40 countries infested with FMD, including China, were imported into the U.S. between January 2010 and November 2013.** Since the units of measure for the imported products vary widely – metric tons, kilo-

OIE Member Countries' Last Update N



Official FMD Status of Member Countries – Whole Countries

- Country/Zone Free Without Vaccination
- Country/Zone Free With Vaccination
- Suspension of
- Suspension of

grams, and liters – volume totals are less useful than total dollar values in making meaningful comparisons.

The dairy imports from the FMD-infested countries included cheese and curd, milk in concentrated and un-concentrated forms, buttermilk, whey, and other products. Some of those products are possible carriers for transporting the foot-and-mouth disease virus into the U.S.

The dairy product imports in question all originated from countries not included on the list of countries with FMD-free status as determined by global and U.S. animal health authorities.

Argentina tops the list

Argentina was the top source of the dairy imports in question – accounting for \$59.753 million worth or 29.1% of the products sourced from countries lacking FMD-free status. Argentina is not included in the list of FMD-free countries published by USDA’s Animal and Plant Health Inspection Service (APHIS), the lead federal agency responsible for protecting the health of U.S. livestock.

FMD-infested Argentina has long been a major source of questionable dairy products imported by Arthur Schuman, Inc. and other shady traders. As reported in November 2006 issue of *The Milkweed*, “Schuman is the largest importer of Italian-type cheeses into the U.S. from low-cost, low-tech, low-quality producers in South America and Eastern Europe. Schuman’s cheap cheese imports displace domestic milk and help put American farmers’ pay prices in the toilet.”

Other notable dairy exporting countries lacking FMD-free status include India (the world’s largest dairy producing nation), Brazil, South Korea, Russia, and China. (See complete list on page 9.)

While live animals and meat present the greatest risk of transmitting the FMD virus, there is also a risk of contamination from dairy products imported from countries where FMD is present. The U.S. and other developed countries allow imports of some cheeses and butter from countries that lack FMD-free status – based on the assessment that such products pose no disease risk. However, national animal health authorities have noted that some dairy products do pose a risk of FMD contamination. (See later in story.)

Highly contagious & economically devastating

Foot-and-Mouth Disease is among the most contagious and economically devastating of all livestock diseases. The FMD virus (*Aphthae epizooticae*) spreads rapidly by many carriers to cloven-hoofed animals, including cattle, swine, sheep, goats, and bison. Dozens of wildlife species, including deer, antelope, hedgehogs, elephants, and armadillos, are “vectors” (host organisms) for spreading FMD across state and national borders.

The FMD virus spreads like wildfire among livestock herds through contact with infected animals, by air and water, and by humans through contact with clothing, shoes, motor vehicles, farm machinery, livestock equipment, feed, and other objects.

The toll of an FMD outbreak is so fearsome due to the huge losses incurred, including the forced destruction of livestock herds over large areas and the costs of quarantines and trade embargoes. The 2001 FMD outbreak in the United Kingdom resulted in the loss of seven million head of cattle and hogs and \$13 billion in economic losses. Japan’s 2010 FMD outbreak – the second in a decade – destroyed 211,000 head of cattle and hogs at a cost exceeding \$3.5 billion.

FMD is top U.S. bioterrorism threat

An outbreak of FMD in the U.S., which has a much larger livestock industry than the UK or Japan, could cripple the nation’s rural economy and threaten national food security. **No wonder the U.S. Department of Homeland Security in March 2007 designated Foot and Mouth Disease as the nation’s top bioterrorism threat.**

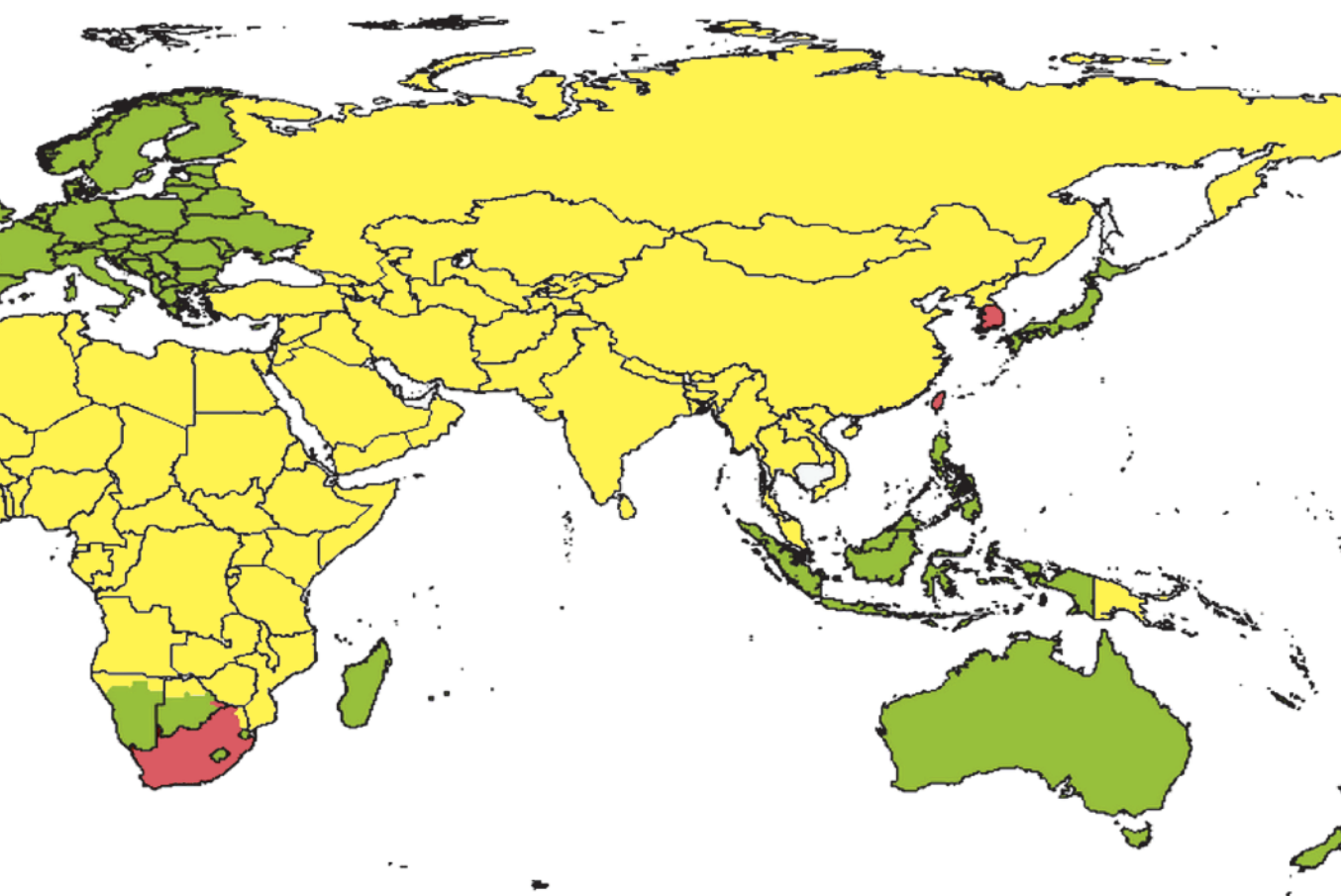
The risks of spreading FMD have skyrocketed with the rapid global movement of people and goods in the era of “Free Trade.” According to veterinary authorities in Australia – a major meat exporter – FMD remains viable “almost indefinitely” below freezing temperatures, making the virus stable in chilled or frozen meat – the forms most common in international trade. This fact underscores the importance of the U.S. ban on meat imports from FMD-contaminated countries like China, Argentina, and Brazil.

Human traffic is another critical “vector” for spreading FMD. One possible nightmare scenario could involve the FMD virus “hitch-hiking” on university Extension livestock specialists travelling back and

Many Countries with Foot-and-Mouth Disease

Official FMD Status Map

November 2013



Country or Zones(s)

Status Free Without Vaccination
Status Free With Vaccination

Containment Zone
No recognised Status

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forth from the U.S., helping China modernize and expand its domestic dairy production. An even worse scenario would be the arrival of FMD on the boots of one or more of the thousands of international guests attending the World Dairy Expo, the annual event in Madison, Wisconsin that concentrates North America's top dairy herd genetics and personnel in one small area.

Countries lack FMD-free status

Globally, the list of FMD-free nations is officially designated by the Paris-based World Organization for Animal Health (known as the OIE from its French name, *Office international des epizooties*). In the U.S., federal regulations (9 CFR §94) require APHIS to maintain a list of countries declared free of foot-and-mouth disease. Unfortunately, both the OIE and APHIS lists show only the countries do not have FMD, leaving observers to "read between the lines" to reach their own conclusions. This "white list" approach is less useful and less informative than a "black list" that directly lists those countries that do have FMD.

APHIS has come under fire by livestock industry critics, who charge that the agency has failed to carry out its basic mission of protecting U.S. livestock herds from outside pestilence. Among the most vocal is R-CALF USA (Ranchers-Cattlemen Action Legal Fund, United Stockgrowers of America), the activist grassroots beef producers' group. R-CALF successfully blocked USDA efforts to lift import restrictions after the outbreak of Bovine Spongiform Encephalopathy ("mad cow" disease) in Canada. R-CALF supports stronger U.S. livestock safeguards, and stands in strong opposition to proposed APHIS rules that would allow "regionalized" beef imports from one part of Brazil, a major cattle-producing nation that lacks FMD-free status.

Critics believe that APHIS, like other key USDA agencies, is unduly influenced by the big meatpacker interests that dominate the National Cattlemen's Beef Association (NCBA), a conservative beef industry lobbying group funded in part by mandatory beef check-off dollars. JBS S.A. of Sao Paulo, Brazil – the largest meatpacker in the U.S. and the world – operates many beef, pork, and poultry plants and beef feedlots in the U.S. JBS and its cronies at NCBA and USDA have fought hard and dirty during the past decade to scuttle the mandatory country-of-origin labeling (COOL) law for meat

passed in 2002. Properly implemented COOL rules inform U.S. consumers of the country-of-origin of fresh beef, pork, and lamb sold at retail. Meatpackers and supermarkets that profit from cheaper foreign meat prefer that consumers not be bothered with the source of their burgers, chops, and steaks.

Even though Brazil lacks FMD-free status, the country exports dairy products to the U.S. and hopes to expand those exports to include beef as well. Despite the potential risk to U.S. livestock producers, APHIS is currently proposing to allow

beef imports into the U.S. from Brazil's State of Santa Catarina under a scheme called "regionalization." The risks of the APHIS "regionalization" scheme are evident due to uncontrollable movement of deer and other wildlife that transmit the foot-and-mouth virus across state and national borders.

How safe are dairy imports?

As required by federal law, USDA has specified various precautions to protect U.S. livestock from foreign disease threats, including some dairy products. The APHIS Web site states:

"A veterinary permit may be required to import certain meat and meat products (e.g., meat pies and prepared foods), poultry, milk, eggs, and dairy products (except butter and cheese) from countries with livestock diseases exotic to the United States." (Emphasis added.)

The dairy products imported from FMD countries extend beyond the "butter and cheese"

The risk assessment of FMD transmission via dairy products is a major concern outside the U.S. as well. In New Zealand – home of Fonterra, the world's largest dairy exporter – animal health authorities have noted the potential of dairy products to spread the FMD virus.

The *New Zealand Veterinary Journal* 50(2), 2002 stated:

"Products made from raw milk are recognised as potential vehicles for the spread of FMD. For example, the virus may survive for up to 2 months in dried casein. However, its survival in cheese made from raw milk depends on the pH achieved during manufacture; if the pH drops to 4.0, the virus is inactivated in seconds, while in cheeses which have a final pH of 6.0 the virus will not survive longer than 30 days. In cheeses that are cured at temperatures of not less than 2°C, the virus will not survive more than 120 days (Christensen 1998).

"New Zealand's very cautious approach to the risk of FMD introduction is reflected by the policy that dairy products may be imported from countries that have not been free from FMD for a period of 12 months only if they are made from milk that has been subjected to one of the following treatments prior to being used for manufacture: double HTST, HTST plus another treatment such as ultra-high temperature (UHT) or UHT treatment plus another treatment such as pH<6.0 for at least 1 h."

Continued on page 10

APHIS List of Countries/Regions Free of Foot-And-Mouth Disease (FMD) and Rinderpest

9 CFR 94.1 Last Modified: Oct 21, 2013

* Australia	Dominican Republic	* Italy	Panama
* Austria	El Salvador	* Jamaica	* Papua New Guinea
* Bahamas, The	* Estonia	* Japan	* Poland
* Barbados	Fiji	* Latvia	* Portugal
* Belgium	* Finland	* Liechtenstein	* Slovakia
* Belize (British Honduras)	* France	* Lithuania	* Slovenia
* Bermuda	* Germany	* Luxembourg (SIC)	* Spain
* Brazil (Santa Catarina State only)	* Greece	* Mexico	St. Pierre and Miquelon
* Canada	Greenland	* Namibia (excluding the region north of the Veterinary Cordon Fence)	* Sweden
* Channel Islands	Guatemala	* Netherlands, The	* Switzerland
* Chili	Haiti	* New Caledonia	Trinidad and Tobago
* Costa Rica	Honduras	* New Zealand	Trust Territories of Pacific Island
* Czech Republic	* Hungary	* Nicaragua	* United Kingdom
* Denmark	Iceland	* Norway	
	* Ireland, Republic of		

*Special categories CFR 94.11 (meat imports/land borders)

SPECIAL CATEGORY REGARDING RINDERPEST AND FMD BECAUSE, EVEN THOUGH THE COUNTRY/AREA HAS BEEN DETERMINED BY THE USDA TO BE FREE OF RINDERPEST AND FMD, ONE OR MORE OF THE FOLLOWING CONDITIONS OCCUR:

1) They supplement their national meat supply through the importation of fresh, chilled, or frozen meat of ruminants or swine from countries/regions that are NOT designated in Title 9, CFR, Part 94.1(a) (hereafter known as The Regulations) as free of rinderpest or FMD; or

2) They have a common land border with countries/regions that are NOT designated in The Regulations as free of rinderpest or FMD; or

3) They import ruminants or swine from countries/regions that are NOT designated in The Regulations as free of rinderpest or FMD under conditions less restrictive than would be acceptable for importation into the United States.

Countries/Regions NOT Recognized Free of FMD but permitted to export fresh (chilled or frozen) beef under specific conditions: 9 CFR 94.22

Uruguay

Countries/Regions Free of Rinderpest: Brazil (Santa Catarina State only), Republic of South Africa, Uruguay

NOTE: The table above is modified only when there are changes to the disease status of countries or regions.

Dairy Imports from Many Countries with Foot-and-Mouth Disease, con't

Continued from page 9

While some of the U.S. dairy imports in question – like cheese and curds – may not in every case pose a risk of carrying FMD, serious questions remain about the other products and broader compliance issues. Given the realities of international trade in meat and dairy products from countries that lack FMD-free status, the following questions must be asked:

- What are the risks from the cheese, butter, milk, natural milk whey, and buttermilk imported from countries infected with FMD?
- Given India's primitive sanitary standards and continuing problems with FMD, are Indian concentrated milk products and natural milk whey materials safe?
- Given APHIS' ambivalence about FMD safeguards – such as its proposal to allow “regionalized” beef imports from Brazil – are the necessary veterinary permits in place and updated?
- Does USDA properly inspect foreign dairy and meatpacking plants, on a regular, ongoing basis, to verify compliance and ensure product safety?

The APHIS list of countries lacking FMD-free status – from which the U.S. sourced dairy product imports in 2010, 2011, 2012 and 2013 – is printed on page 9 of this issue. The APHIS document reads like a “rogues’ list” of nations lacking basic, modern dairy farm and dairy plant sanitary standards. Further, some of those nations play key roles in the international drug trade. Example: Afghanistan – which currently produces about 90% of the world's heroin supply – exported dairy products to the U.S. during 2012.

Global trade: the cold realities

Many developing and lesser-developed countries lacking FMD-free status also lack modern, sanitary facilities for producing milk and processing dairy products for export to the U.S. These countries – including India, China, Argentina, Brazil, and Russia – have failed for decades to eliminate FMD within their borders and don't appear to be making progress toward disease-free status. Dairy exporting countries in Asia, South America, and Africa are surrounded on all sides by FMD-infected neighbors. In such cases, the FMD virus moves easily across borders on humans, livestock, and wildlife.

Beyond the physical challenges, observers question whether these countries can be trusted to comply with U.S. import FMD regulations. Governments may be too corrupt, incompetent, and/or underfunded to ensure compliance with U.S. standards. These countries' dismal track records on livestock disease control and food sanitation provides scant assurance that the required APHIS veterinary permit process is adequate to ensure the safety of dairy products imported to the U.S. And, that's making the very big assumption that these countries are making good faith efforts to comply with the letter and spirit of U.S. rules.

Global agribusiness continues to push for the elimination of national border protections (“non-tariff trade barriers”) to allow greater access to cheap inputs. Witness meatpacking giant JBS S.A.'s success in persuading APHIS to allow beef imports from FMD-infected Brazil under “regionalization” so it can procure cheaper foreign cattle.

UK horsemeat scandal

The lack of U.S. Government resources committed to protecting our borders only about 1% of imports are physically inspected –raises further questions about the safety of meat and animal product imports. Monthly “import detention lists” published by the U.S. Food and Drug Administration reveal just how unsanitary (listeria, rodent filth, spoilage, etc.) some agricultural imports can be, even from wealthy western European countries with sanitary standards equal to the U.S. The 2013 horsemeat scandal in the United Kingdom and Ireland shows the need for vigilance in policing agricultural imports, even within the safe confines of the European Union. DNA tests revealed that frozen foods containing “beef” imported other parts of the EU were adulterated with horsemeat. Regulators discovered that some big UK supermarket chains had sourced the adulterated meat from low-cost suppliers Ireland, Spain, the Netherlands, and other modern, wealthy European countries. Imagine what is possible in less-advanced Third World countries.

A call to action ...

The lack of adequate U.S. biosecurity safeguards against FMD is appalling. Why would the U.S. Government violate its own laws and risk the public welfare by allowing meat and dairy product imports from known sources of FMD contamination? Could it be that some federal agencies like APHIS are committed to serving something other than the national interest? These are serious questions that deserve serious answers.

The protection of vital U.S. livestock resources from foreign diseases should be a top priority for all elected officials at the state and federal levels, regardless of political affiliation. Our national food security and the entire rural economy are at risk if FMD were introduced into the U.S. either by design (terrorism) or accident (lax enforcement). If crooked European traders seeking to make a quick euro could smuggle cheap horsemeat as beef into the U.K. for months undetected, imagine the harm a motivated terrorist could do smuggling a lethal virus into the U.S. just one time.

- Lawmakers and policymakers should act immediately to protect vital U.S. interests by:
 - Banning imports of all meat, dairy products, and other relevant animal products from countries that lack FMD-free status in whole or in part.
 - Amending federal regulations with new provisions that prohibit meat and dairy product imports from supposedly disease-free regions of countries that lack FMD-free status due to the risk of reinfection.
 - Reforming USDA policies, priorities, and programs to ensure that regulators follow the letter as well as the letter of the law;
 - Reducing the influence of the big meatpackers and other vested corporate interests in subverting the development and implementation of regulatory policy at APHIS and other key federal agencies.

Chapter 04 Dairy Product Imports from Countries Lacking FMD-Free Status

USDA/FAS Area/Partners of Origin

Area/Partners of Origin	Values in Thousands			
	2010 Value	2011 Value	2012 Value	Jan - Nov 2013 Value
Argentina	\$18,615	\$18,651	\$16,688	\$5,799
Israel(!)	\$7,200	\$7,421	\$10,320	\$6,686
Peru	\$2,954	\$4,427	\$5,875	\$8,167
Turkey	\$2,414	\$2,102	\$3,713	\$5,466
Jamaica	\$2,602	\$3,568	\$3,162	\$2,106
India	\$3,761	\$2,696	\$2,625	\$1,323
Egypt	\$1,318	\$1,486	\$1,866	\$1,842
Brazil	\$1,218	\$1,309	\$1,192	\$966
Colombia	\$772	\$532	\$1,144	\$1,007
Bahrain	\$1,820	\$202	\$978	\$398
Philippines	\$382	\$392	\$566	\$523
Russia	\$211	\$360	\$318	\$245
Armenia	\$313	\$401	\$191	\$99
Jordan	\$140	\$330	\$120	\$104
Ecuador	\$0	\$0	\$87	\$72
Malaysia	\$165	\$0	\$87	\$90
Iran	\$7	\$0	\$80	\$0
United Arab Emirates	\$0	\$0	\$75	\$0
Bangladesh	\$21	\$35	\$70	\$71
Lebanon	\$99	\$39	\$34	\$0
Sri Lanka	\$7	\$21	\$31	\$23
Georgia	\$0	\$9	\$27	\$0
Fiji(!)	\$65	\$73	\$17	\$48
Other Pacific Islands, NEC(*)	\$65	\$73	\$17	\$48
Korea, South	\$21	\$37	\$16	\$3
China	\$8	\$3	\$14	\$0
Taiwan	\$0	\$0	\$12	\$3
Afghanistan	\$0	\$3	\$5	\$0
Kenya	\$0	\$3	\$3	\$4
Cape Verde(!)	\$0	\$0	\$0	\$6
Ethiopia(!)	\$3	\$8	\$0	\$0
Hong Kong	\$3	\$0	\$0	\$0
Pakistan	\$0	\$0	\$0	\$62
Saudi Arabia	\$210	\$44	\$0	\$0
Syria	\$170	\$0	\$0	\$0
Thailand	\$0	\$0	\$0	\$15
Namibia	\$0	\$0	\$0	\$0
West Bank(!)	\$0	\$0	\$0	\$9
Africa, not elsewhere specified(*)	\$0	\$0	\$0	\$6
Yemen(*)	\$0	\$0	\$0	\$34
Grand Total	\$51,768	\$51,657	\$59,653	\$41,923

Notes:

1. Data Source: U.S. Census Bureau Trade Data
2. All zeroes for a data item may show that statistics exist in the other import type. Consumption or General.
3. (*) denotes a country that is a summarization of its component countries.
4. (!) denotes a country which is summarized into its obsolete country.
5. Product Group : Harmonized

U.S. FMD-Related Import Regulations:

9 CFR §94.1 Regions where rinderpest or foot-and-mouth disease exists; importations prohibited.

(a) APHIS considers rinderpest or foot-and-mouth disease to exist in all regions of the world except those declared free of one or both of these diseases by APHIS.

(1) A list of regions that APHIS has declared free of rinderpest and a list of regions APHIS has declared free of foot and mouth disease are maintained on the APHIS Web site at:

http://www.aphis.usda.gov/import_export/animals/animal_disease_status.shtml.

Copies of the list will also be available via postal mail, fax, or email upon request to the Sanitary Trade Issues Team, National Center for Import and Export, Veterinary Services, Animal and Plant Health Inspection Service, 4700 River Road Unit 38, Riverdale, Maryland 20737.

(2) APHIS will add a region to the list of those it has declared free of rinderpest or foot-and-mouth disease, or both, after it conducts an evaluation of the region in accordance with §92.2 of this subchapter and finds that the disease, or diseases, are not present. In the case of a region formerly on this list that is removed due to an outbreak, the region may be returned to the list in accordance with the procedures for reestablishment of a region's disease-free status in §92.4 of this subchapter. APHIS will remove a region from the list of those it has declared free of rinderpest or foot-and-mouth disease upon determining that the disease exists in the region based on reports APHIS receives of outbreaks of the disease from veterinary officials of the exporting country, from the World Organization for Animal Health (OIE), or from other sources the Administrator determines to be reliable.

(b) The importation of any ruminant or swine or any fresh (chilled or frozen) meat of any ruminant or swine¹ that originates in any region where rinderpest or foot-and-mouth disease exists, as designated in paragraph (a) of this section, or that enters a port in or otherwise transits a region in which rinderpest or foot-and-mouth disease exists, is prohibited.