



# National Milk Producers Federation

National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111 • FAX 703-841-9328

Agri-Mark, Inc.  
Arkansas Dairy Cooperative Association  
Associated Milk Producers, Inc.  
Cass-Clay Creamery, Inc.  
Continental Dairy Products, Inc.  
Cooperative Milk Producers Assn.  
Dairy Farmers of America, Inc.  
Dairymen's Marketing Cooperative, Inc.  
DairyLea Cooperative Inc.  
Ellsworth Cooperative Creamery  
Farmers Cooperative Creamery  
First District Association  
Foremost Farms USA  
Humboldt Creamery  
Just Jersey Cooperative, Inc.  
Land O'Lakes, Inc.  
Lone Star Milk Producers, Inc.  
Manitowoc Milk Producers Coop.  
MD & VA Milk Producers Cooperative Association, Inc.  
Michigan Milk Producers Assn.  
Mid-West Dairymen's Company  
Northwest Dairy Association  
Prairie Farms Dairy, Inc.  
St. Albans Cooperative Creamery, Inc.  
Scioto County Co-op Milk Producers' Assn.  
Select Milk Producers, Inc.  
Southeast Milk, Inc.  
Swiss Valley Farms, Co.  
Tillamook County Creamery Assn.  
United Dairymen of Arizona  
Upstate Niagara Cooperative, Inc.  
Zia Milk Producers

The Honorable Secretary Michael Johanns  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

May 7, 2007

Dear Secretary Johanns,

The National Milk Producers Federation (NMPF) opposes the importation of cattle from Canada for breeding or herd replacement purposes. Cattle imported for breeding or herd replacement purposes may not show clinical symptoms of BSE infection for many years, allowing BSE to incubate in U.S. cattle herds. In addition, any offspring from these cattle will also reside in the U.S. cattle population. If any of these animals are confirmed positive for BSE, both domestic and export markets for U.S. producers will be disrupted. The significant economic impact of importing a BSE positive animal from Canada will be borne by U.S. producers.

Recently (May 2, 2007), the Canadian Food Inspection Agency (CFIA) confirmed their 10<sup>th</sup> case of BSE in a 66-month old dairy cow (born in late 2001) on a farm in the lower mainland of British Columbia. It is apparent that Canada has not effectively contained BSE within its cattle population. As illustrated in the bullets below, seven BSE positive animals identified in Canada were born after the Canadian feed ban went into effect in 1997. Five BSE positive animals identified in Canada were born after the USDA-determined date of effective enforcement (March 1, 1999) of the Canadian feed ban (72 FR 1108). The enforcement of the 1997 Canadian feed ban does not appear to be effective in preventing the spread of BSE in Canada.

- BSE case confirmed on January 11, 2005 – 7 year old Charolais beef cow born March 21, 1998
- BSE case confirmed on January 22, 2006 – 6 year old Holstein-Hereford cross cow born April 15, 2000
- BSE case confirmed on April 16, 2006 – 6 year old Holstein cow born April 29, 2000
- BSE case confirmed on July 13, 2006 – 50 month old purebred dairy animal born April 22, 2002
- BSE case confirmed on August 23, 2006 – 8 to 10 year old Charolais crossbred beef cow born between 1996 and 1998
- BSE case confirmed on February 7, 2007 – 79 month old mature Angus bull born in 2000
- BSE case confirmed on May 2, 2007 – 66 month old dairy cow born in late 2001

Jerry Kozak, President/Chief Executive Officer

Charles Beckendorf, Chairman

It does not appear that Canada has taken all necessary measures to achieve the elimination of BSE from Canadian national cattle herd. All necessary elements of their feed ban will not even come into effect until July 12, 2007. Additionally, the CFIA expects to detect more BSE cases over the next 10 years in the Canadian national herd. Allowing Canadian cattle to be imported for breeding or herd replacement purposes has the high probability of introducing a BSE animal into the U.S.

Under the Animal Health Protection Act, the Secretary of Agriculture may prohibit the importation of any animal or article if the Secretary determines that the prohibition is necessary to prevent the introduction into or dissemination within the United States of any pest or disease of livestock. NMPF believes that the BSE situation in Canada is such that an animal could be imported into the U.S. and, if allowed to reside amongst the U.S. dairy herd, introduce or disseminate BSE in the U.S. This is evident by the number of cases of BSE from animals born after the USDA determined date of effective enforcement of their feed ban.

We request that USDA not finalize proposed regulations (72 FR 1108) which would allow importation of cattle from Canada for breeding or herd replacement purposes. We do not oppose importation of cattle from Canada that are required to go directly to slaughter and suggest that USDA proceed with the portion of the proposed regulations which addresses products and animals going directly to slaughter. However, USDA should not allow importation of live animals from Canada that could reside in the U.S. cattle population.

Thank you for the opportunity to share these comments. Please contact NMPF if you have any questions or require any clarification on these remarks.

Sincerely,



Jerry Kozak  
President & Chief Executive Officer  
National Milk Producers Federation