



NATIONAL CATTLEMEN'S BEEF ASSOCIATION
CENTER FOR PUBLIC POLICY

November 12, 2021

The Honorable Thomas J. Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack:

On behalf of America's cattle producers, the National Cattlemen's Beef Association (NCBA) writes to you with great concern over Brazil's repeated lack of timely reporting of animal health diseases to the World Organization for Animal Health (OIE), as well as its trade partners. Of particular concern are Brazil's recent incidences of atypical bovine spongiform encephalopathy (BSE) in Minas Gerais on June 11, 2021,^[i] and in Mato Grosso on June 25, 2021.^[ii] While atypical BSE cases are rare and are excluded from OIE's scope of BSE categorization, most countries immediately report atypical BSE cases as a matter of transparency and as a commitment to objective, science-based standards. In fact, the OIE clearly states that "Members must report the occurrence of animal diseases listed by the OIE, the emergence of new diseases and significant epidemiologic events within 24 hours of the event."^[iii] Unfortunately, the OIE was not notified of Brazil's two BSE cases until September 3, 2021 — several weeks after both cases were identified.

Many times, countries that experience BSE cases are faithful to report the unfortunate incidences within a matter of hours or days, including recent cases in the United Kingdom^[iv] and Germany.^[v] It is deeply concerning that Brazil was unable to report or chose not to report its two BSE cases to the OIE for several weeks. Brazil has a history of delayed reporting of BSE cases including one atypical case in 2019 (2 months),^[vi] an atypical case in 2014 (1 month),^[vii] and an atypical case in 2012 (nearly 2 years).^[viii] Brazil's history of failing to report incidences of BSE calls into question its commitment to reporting other significant diseases such as African Swine Fever, Avian Influenza, or Foot-and-Mouth Disease. It is understandable that these diseases, if reported, could pose a major threat to Brazil's exports, as noted in the OIE's guidance in reporting.

"The notification of diseases may have a negative impact on the economic performance of a country (e.g. by causing loss of export markets or discouraging tourism). However, new information technologies and practices make it difficult for governments to hide occurrences of serious notifiable diseases. A country's credibility must be based on timely and accurate notification of diseases, and this also gives the respective government a much better position to contain a disease, as compared with the situation where it first has to defend a failure to comply with international obligations. Regaining credibility in the face of public knowledge of failure to meet international rules is a costly and time-consuming exercise and can be of the highest political risk for policy-makers."^[ix]



Brazil enjoys the benefits of market access awarded to countries with the credibility of OIE’s negligible risk designation – credibility that is based on the timely reporting of BSE cases to the OIE. NCBA has serious concerns that the recent events are evidence that Brazil may lack credible food safety and animal health systems, and Brazil’s irresponsible behavior may pose a significant threat to the health and safety of the U.S. cattle herd.

It is out of an abundance of caution that NCBA requests USDA take immediate action to indefinitely suspend Brazil’s fresh beef access to the U.S. market until USDA conducts a thorough review, including a risk assessment, of Brazil’s central competent authority – the Ministry of Agriculture, Livestock, and Food Supply (MAPA), as well as its veterinary diagnostic laboratory system. NCBA recommends the indefinite suspension of fresh beef imports from Brazil until MAPA makes

systemic changes and takes necessary steps to demonstrate Brazil’s commitment to an objective, science-based regulatory system that restores confidence in Brazil’s participation in the global food supply.

America’s cattle producers carry the scars of devastation from BSE, and we have worked diligently to restore the trust of consumers at home and abroad. We greatly benefit from market access built on science-based standards and a commitment to transparency and integrity. The consumer trust we have worked so hard to build should not be jeopardized by any country that seeks to conceal the truth about animal health or food safety concerns or lacks the ability to provide an equivalent level of safety. American cattle producers and beef consumers deserve better, and Brazil must prove itself worthy of the U.S. seal of approval.

Sincerely,

Ethan L. Lane
Vice President, Government Affairs
National Cattlemen’s Beef Association

- ⁱⁱ OIE World Animal Health Information System (OIE-WAHIS), Report ID 151513, 09/06/2021.
- ⁱⁱⁱ OIE World Animal Health Information System (OIE-WAHIS), Report ID 151514. 09/06/2021.
- ⁱⁱⁱⁱ “Notification of Animal and Human Diseases – Global Legal Basis,” https://www.oie.int/fileadmin/Home/eng/Current_Scientific_Issues/docs/pdf/notification-EN.pdf; accessed 11/02/2021.
- ^{iv} OIE World Animal Health Information System (OIE-WAHIS), Report ID 151716, 09/17/2021.
- ^v OIE World Animal Health Information System (OIE-WAHIS), Report ID 152035, 10/14/2021.
- ^{vi} OIE World Animal Health Information System (OIE-WAHIS), Report ID 30678, 05/31/2019.
- ^{vii} OIE World Animal Health Information System (OIE-WAHIS), Report ID 15148, 05/02/2014.
- ^{viii} OIE World Animal Health Information System (OIE-WAHIS), Report ID 12682, 12/07/2012.
- ^{ix} “Notification of Animal and Human Diseases – Global Legal Basis,” https://www.oie.int/fileadmin/Home/eng/Current_Scientific_Issues/docs/pdf/notification-EN.pdf; accessed 11/02/2021.



