

Sally Garcia

From: Carol Pivonka
Sent: Monday, July 15, 2013 3:09 PM
To: 1-legal
Subject: FW: Comments to Brucellosis Rule Change and Consideration
Attachments: 2013-1.07.11 SUBMITTED DOL Comments on proposed TAHC rule copy.pdf

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From: Darrell Stevenson [mailto:stevenson.darrell@yahoo.com]
Sent: Monday, July 15, 2013 3:06 PM
To: comments
Cc: Christian Mackay; MZaluski@mt.gov; Jan French
Subject: Comments to Brucellosis Rule Change and Consideration

To Whom it May Concern:

The Montana State Veterinarian and Montana Board of Livestock submitted the attached concerns to the Texas Animal Health Commission this week. These considerations are viewed in grave concern from Montana's cattle industry especially when considering all of the effort, time and expense the Greater Yellowstone Area (MT, WY and ID) has put into managing and controlling Brucellosis. As you can see the rate of incidence is extraordinarily low and our policing system has proven to manage with superb efficiency.

I can't help but think that long term Montana/Texas relations will be hindered with such mandates and that more specifically the movement of breeding cattle will slow or cease. None of us want this to be the case. The follow-up testing period alone is costly and time consuming. Since the proof of science has already been reviewed by Dr Zaluski in the formally submitted statement, I would like to offer questions from a producers perspective;

- Why isn't the science trusted? As reviewed in the attached, incident rate in Montana is low and imported cattle to Texas become even lower with a pre-shipment test?
 - With no documented case of bulls spreading Brucellosis, why are they bundled into the concern?
- Why would the State of Texas choose to self impose long term quarantines and testing programs for cattle of such low incident rates?
 - In a time of tightening budgets and USDA overhauls, why would Texas put more pressure on staff obligations and commitments when Montana has already extended and covered these concerns?
 - Are we not using the same science/USDA protocol?
- Why would Texas choose to tighten or restrict access to a large supply of quality breeding stock, especially when the prospect of rebuilding the Texas cow herd looks to be in the near future?
- Why are these mandates being targeted at the Greater Yellowstone Area states rather than all state's of Class B status?

- o Why is this a blanket policy with no regard to the actual region of risk? We can all admit that Southwestern Montana and the area near Yellowstone National Park is of consideration, but why Lewistown, Sidney and Miles City or other areas outside of the Designated Surveillance Area? These shouldn't be areas of concern at all. Our State recognizes this as well as the USDA, why doesn't Texas?

As an active livestock exporter, I also have concern. I was finally able to shift vessel loading interest last year to Galveston, TX instead of Wilmington, DE or Eastport, ME. For me and being a westerner, I would much prefer working with the same USDA region and loading cattle in Texas. Once again, I can't help but think that such protocol will shift all interest back to the East Coast.

- With much of the current breeding stock for export being sourced, quarantined and health tested in MT, WY and ID . . .
 - o How are we to continue import negotiations with any foreign market as clean regions of health, when one of our own State's has self imposed restrictions?
 - o When said cattle are to be exported, what is the benefit or possibility of transporting, laying-over and loading in Texas?
 - IF they don't qualify to be in Texas, how can they be exported to any other market (foreign or domestic)?
 - Where are the standards with this?
 - With such concerns, is there any choice but to look back East to Delaware and Maine.

Counter protocols . . . why would Texas be openly willing to restrict their own livestock industry marketing? I'm not a politician and don't wish to be, however we all know in this realm that counter measures are common. Whether it be intrastate movement, export potential or loss of Port use in Galveston, I'm concerned by such repercussions especially when they are not based on reasonable protocol with sound science and can be avoided.

At the end of the day and from my perspective, I'm asking the final question of "why is this being considered?" To me, the scientific and economic sense is lacking and the risk of backlashes are unneeded and unwelcome by all.

This is not intended to be brash in nature, just genuine in concern and question. Thank you for your consideration.

Sincerely,

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