



United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

OCT 3 2006

Mr. Gene Bauston
President
Farm Sanctuary
Post Office Box 150
Watkins Glen, New York 14891

Dear Mr. Bauston:

Thank you for your July 10, 2006, letter, cosigned by your colleagues, concerning the Department of Agriculture's (USDA) safeguarding and surveillance activities in relation to bovine spongiform encephalopathy (BSE).

USDA and other Federal agencies are firmly committed to protecting humans and animals from exposure to the BSE agent. Because the Department of Health and Human Services' (HHS) Centers for Disease Control and Prevention (CDC) is responsible for addressing questions regarding human health issues in the United States, I have taken the liberty of forwarding a copy of your letter to CDC officials for their consideration of your comments about CJD and vCJD.

With regard to USDA's activities, it is important to understand that—for reasons discussed below—USDA's BSE surveillance is being conducted not as a food safety measure but rather as a monitoring effort designed specifically to evaluate the effectiveness of the United States' BSE safeguarding measures with respect to animal health. Our recently completed analysis of surveillance data from the past 7 years has confirmed the extremely low prevalence of BSE in the United States.

Protection of public health from BSE is achieved by the removal from the human food supply of the animal tissues in which the BSE infective agent would be found if present—often referred to as specified risk materials—and by other controls imposed at the slaughter level. These additional controls include a ban on nonambulatory cattle from the human food chain; a prohibition on air-injection stunning of slaughter cattle; the requirement of additional process controls in advanced meat recovery systems; and a prohibition on the use of mechanically separated meat in human food. Additionally, protection from BSE and other diseases is achieved through ante mortem inspection of slaughter cattle and the exclusion of animals with any clinical signs of neurological disease or other abnormalities.

We at USDA believe that it is important to encourage the public and U.S. trading partners to understand the significant distinction between current animal testing for BSE for surveillance purposes as contrasted with food safety testing on specific animals. Available science tells us that the time between an animal's initial infection with BSE and the appearance of symptoms is generally very long—about 5 years, on average. The earliest point at which current tests can accurately detect BSE is about 2 to 3 months before the animal begins to show symptoms. So we know that there is a long period in the life of an infected animal when currently available tests would not detect the disease, especially if the animal is both young and clinically normal at the time samples are obtained for testing. Most cattle that go to slaughter in the United States are both young and clinically normal.

On the other hand, current test technology provides highly meaningful and reliable results when used for disease surveillance purposes on animals within USDA's targeted populations—specifically, adult animals exhibiting some type of clinical abnormality that could be consistent with BSE. USDA's targeted approach for BSE surveillance is based on what we have learned from the European experience and on the assumption that if we cannot find disease in the cattle population in which disease is most likely to be detected, disease will be even more unlikely to be found in the nontargeted population. From this smaller number of samples we are able, using statistical methods, to calculate the estimated prevalence of BSE in the U.S. cattle population as a whole. When used for the surveillance program, the current test technology enables us to accurately assess the effectiveness of measures currently taken by USDA and HHS' Food and Drug Administration (FDA) to protect public and U.S. animal health—in particular, FDA's 1997 ban on ruminant-to-ruminant feeding.

We would also like to note regarding your reference to the situation in the United Kingdom and other countries that these regions have had significant BSE exposure and circulating infectivity. In the United States, by contrast, we can assume very limited exposure, if any, due to the isolated nature of the two native cases detected to date and the safeguards that have been in place for the past decade.

Concerning the question of allowing private companies to conduct BSE testing, we must emphasize that USDA has a mandate to ensure effective, scientifically sound testing for significant animal diseases and to maintain domestic and international confidence in U.S. cattle and beef products. Because a negative test on an animal—especially a young and clinically normal animal—cannot be interpreted to mean that the animal is necessarily "BSE-free," the currently approved surveillance test kits, if administered by a private company for marketing purposes, would offer no meaningful food safety information. It would be inconsistent with USDA's mission to allow a company to conduct testing that suggests otherwise, especially with respect to the risk of a very serious foodborne illness.

In April 2006, USDA released the analysis of 7 years of BSE surveillance data mentioned earlier. This included data from an enhanced surveillance program that began in June 2004 as a one-time effort to determine the prevalence of BSE in the United States. The analysis concluded

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that the prevalence of BSE in our Nation is less than 1 case per million adult cattle. Accordingly, on July 20, 2006, I announced a transition to an ongoing BSE surveillance program that corresponds to this extremely low prevalence. USDA's ongoing surveillance program will maintain our ability to detect BSE and will provide assurance that our interlocking safeguards are successfully preventing BSE while continuing to exceed science-based international guidelines.

We at USDA agree with you about the importance of animal tracking, and to that end we have recently published an implementation plan for the National Animal Identification System (NAIS). The implementation plan sets an aggressive timeline for establishing a fully operational system by early 2007 and projects participation levels needed to achieve full participation by 2009. We are pleased that all operational components of the system are, or soon will be, available to support the participation of stakeholders.

It is our belief that broad support for the NAIS—coupled with the need for expedited tracebacks during animal disease outbreaks and future market demands—will motivate a majority of stakeholders to participate voluntarily. Market demands such as traceability and verification of source and age are increasing in importance and are likely to become the primary drivers in achieving a successful level of participation in the NAIS.

Our long-term objective, once the NAIS is fully implemented, is in the event of an animal disease outbreak to have the capability to quickly obtain a record of the animal premises, of individual animals with which the affected animal came into contact, and of animal movements for use by animal health officials in a response. While such a tracking system will enhance our capability to investigate an incident of BSE or another disease of concern, experience worldwide has shown that it is highly unusual to find BSE in more than one animal in a herd or in an affected animal's offspring. Further information about the NAIS is available on the website of USDA's Animal and Plant Health Inspection Service (APHIS) at <http://animalid.aphis.usda.gov/nais/index.shtml>.

Again, thank you for your letter. We appreciate the opportunity to engage in dialogue on these topics with concerned individuals such as yourself and hope that this information will be helpful to you. A similar response is being sent to each of your colleagues.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Johanns". The signature is fluid and cursive, written over a light-colored background.

Mike Johanns
Secretary