

Congress of the United States
Washington, DC 20515

October 2, 2024

The Honorable Gene L. Dodaro
Comptroller General
U.S. Government Accountability Office
441 G Street NW
Washington, D.C. 20548

Dear Comptroller General Dodaro,

We write to request a Government Accountability Office (GAO) review of the procedure and methodology used by the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) to finalize the rule "*Importation of Fresh Beef From Paraguay*" (88 Fed. Reg. 77883). While we are staunch proponents of robust international trade, we remain deeply concerned that the conclusions drawn in the risk assessments used by APHIS to promulgate this final rule place America's ranchers and livestock producers at an unnecessary risk of an outbreak of foreign animal diseases, such as foot-and-mouth disease (FMD).

FMD is an extremely contagious viral disease with morbidity rates as high as ninety percent, causing significant weight loss and reduced milk production in affected animals. While FMD has not been detected in the United States since 1929, the disease continues to pose a serious threat to animal health and agricultural economies throughout the world. According to the National Institutes of Health (NIH), the economic impact of FMD in endemic regions of the world is estimated to be \$6.5-21 billion per year. An FMD outbreak in the U.S. would lead to direct and indirect losses related to eradication and trade disruptions that would likely cost the American economy billions of dollars.

Given the devastating consequences the introduction of FMD would have on the U.S. economy, it is concerning that APHIS would allow the importation of fresh beef from Paraguay, a country that vaccinates for FMD. This is even more troublesome provided the foundation for APHIS' decision is based on information gathered during its official site visits to the country in 2008 and 2014. Without a more recent site visit by APHIS to verify Paraguay's capability to address a potential outbreak of FMD, the agency is directly putting the livelihoods of U.S. livestock producers at undue risk.


U.S. farmers, ranchers, and livestock producers have worked diligently to create the safest and most efficient food production system in the world. Moreover, Congress remains committed to investing in the National Animal Health Laboratory Network (NAHLN), National Animal Disease Preparedness and Response Program (NADPRP), and the National Animal Vaccine and Veterinary Countermeasures Bank (NAVVCB) to ensure USDA has the necessary capabilities to combat and recover from foreign animal disease outbreaks. It is critical that we maintain the integrity of our regulatory process, while safeguarding the interests of America's agricultural industry, consumers, and taxpayers.

Specifically, using Paraguay as a case study, we request GAO to conduct a study and report on the following:

1. What is the process APHIS uses to gather information about a country's ability to identify and control FMD, including the in-country site visits to validate animal health data, the risk analysis, and the risk estimation utilized to finalize a regulation?
 - a. How has that process changed, if at all, since the 2017 GAO report "*Foot-And-Mouth Disease: USDA's Evaluations of Foreign Animal Health Systems Could Benefit from Better Guidance and Greater Transparency?*"
 - b. How did APHIS implement the recommended changes from the 2017 GAO report when evaluating Paraguay's animal health systems?
2. What data sources and other information does APHIS consider when assessing the risk posed by foreign countries' animal health systems and to what extent are these data sources and other information consistent with OMB information quality standards?
 - a. To what extent does USDA/APHIS use recent data from in-country site visits and other sources to help ensure its decisions on countries' import requests reflect current conditions?
 - b. What actions, if any, does APHIS take to update information gathered from in-country site visits prior to a final decision to verify the most accurate assessment of a country's capabilities to prevent and respond to an outbreak of foreign animal diseases like FMD?
3. As advised in the 2017 GAO report, has the agency instituted the written reporting and management controls recommendations for the in-country site visits?
4. What improvements could APHIS make to strengthen the process for evaluating the animal health systems of countries seeking to export beef to the U.S.?

Thank you for your attention to this matter. If you have any questions about this request, please contact Hunter Harris (hunter.harris@mail.house.gov) and Justina Graff (justina.graff@mail.house.gov). We look forward to your response.

Sincerely,



Ronny L. Jackson
Member of Congress



Glenn "GT" Thompson
Member of Congress
Chairman
House Committee on Agriculture