



December 29, 2014

Docket Number APHIS-2014-0032  
Regulatory Analysis and Development  
PPD, APHIS, Station 3A--03.8  
4700 River Road Unit 118  
Riverdale, MD 20737-1238

RE: Docket Number APHIS 2014-0032, Importation of Beef From a Region in Argentina

Thank you for the opportunity to provide feedback on behalf of the Livestock Marketing Association (LMA) on USDA's proposal for the importation of fresh beef from Northern Argentina. The LMA is the leading national trade organization for more than 800 livestock marketing businesses located throughout the United States. We represent more than 75 percent of the regularly selling local livestock auction markets. Approximately 36 million head of cattle are sold at livestock markets each year.

First, LMA is committed to a prosperous, healthy beef industry. We recognize international trade provides a great benefit to U.S. beef producers, and we champion policy that eliminates unnecessary trade restrictions. However, at the same time, the health of the U.S. beef herd is a valuable asset that should not be compromised. This is especially true when it comes to maintaining the Foot and Mouth Disease- (FMD) –free status of the United States. Much of the value U.S. producers gain from international trade would evaporate with trade restrictions if FMD was found in the U.S.

Argentina has a long history of FMD outbreaks and continues not to be seen as FMD-free by APHIS due to the vaccination program practiced in the region. In addition, there is higher risk of FMD reintroduction into the region of Northern Argentina due to it bordering Bolivia and Paraguay, which are not FMD free. Risks not fully addressed include movement across borders of livestock moving illegally, wildlife, and feral swine. We view importing fresh beef from this region as an unnecessary risk.

We also find it troubling that Argentina has a history of concealing FMD outbreaks from its trading partners, including the United States. Our members believe there are not adequate assurances that Argentina would reliably and rapidly provide information if circumstances within the country change.

Questions also remain about the adequacy of the risk-assessment methodology and reporting.

We are not comfortable that the risks associated with import of fresh beef from Northern Argentina are fully known and properly weighed. Due to this, we respectfully request that USDA withdraws the proposed rule.

Please contact me at [cgood@lmaweb.com](mailto:cgood@lmaweb.com) or 816-305-9540 if you would like additional information to discuss this matter further.

Sincerely,  
Chelsea Good  
LMA Vice President of Government and Industry Affairs

***Over 50 years of dedicated service to the Livestock Industry***

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