



Submitted via Fed. Reg. Rulemaking Portal

February 20, 2014

Docket No. APHIS-2009-0017
Regulatory Analysis and Development
PPD, APHIS
Station 3A-03.8
4700 River Road Unit 118, Riverdale,
MD 20737-1238

To Whom It May Concern:

This letter is submitted on behalf of the U.S. Section of the Brazil-U.S. Business Council (the Council) pursuant to notice of Proposed Rule published by the Animal and Plant Health Inspection Services (APHIS) on December 23, 2013 in the Federal Register (78 FR 77370).

The Council is the premier business advocacy organization dedicated to strengthening the economic and commercial relationship between Brazil and the United States. Established in 1976, the Council is composed of two sections. The U.S. Section of the Council represents more than 100 of the top U.S. companies with investments in Brazil and operates under the administrative aegis of the U.S. Chamber of Commerce. The Brazil Section of the Council is housed in the Brazilian National Confederation of Industry (CNI), composed of the 27 Brazilian state-level federations of industries.

The Council's overarching vision is a barrier-free bilateral trade and investment relationship between Brazil and the United States. In synch with this vision, the Council supports amending APHIS regulation to allow the importation of fresh beef from the Brazilian States of Bahia, Distrito Federal, Espirito Santo, Goiás, Mato Grosso, Mato Grosso do Sul, Minas Gerais, Paraná, Rio Grande do Sul, Rio de Janeiro, Rondonia, São Paulo, Sergipe and Tocantins (78 FR 3371). Such a decision would be well-founded in APHIS' risk assessment study of December 2013 which concludes that fresh beef can be safely imported from these designated regions in Brazil into the United States. The Council also supports APHIS' intended decision to add Brazil to the list of regions recognized as free of rinderpest (78 FR 77372).

The Council is pleased with APHIS' conclusion that:

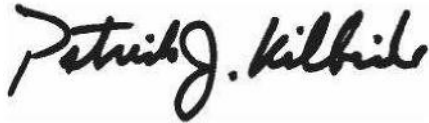
1. The risk of foot-and-mouth (FMD)-infected beef entering the United States from the designated regions and exposing the U.S. livestock is found to be low (Risk Analysis, at p. 78).
2. Brazil has infrastructure and emergency response capabilities to adequately and effectively contain and eradicate any outbreak of FMD (78 FR 77371,77372).

3. Changes in U.S. beef production, consumption and exports would be inconsequential, but would translate into a slight decline in price to U.S. consumers (78 FR 77375).

The Council applauds the U.S. government initiative to consider opening the U.S. market to Brazilian beef. Such a measure would represent significant progress towards a barrier-free trade relationship between the two countries. Thus, we respectfully request the final approval of the proposed rule based on APHIS encouraging expert opinion as detailed in its recent risk assessment study, with a focus on food safety first and foremost.

Should you have any questions, please do not hesitate to contact us.

Yours truly,

A handwritten signature in black ink that reads "Patrick Kilbride". The signature is written in a cursive style with a large initial 'P' and 'K'.

Patrick Kilbride
Executive Director,
Brazil-U.S. Business Council (U.S. Section)