

The Brazil-U.S. Business Council (“Council”) supports the amendment of U.S. regulations governing the importation of certain animals products by adding the Brazilian state of Santa Catarina to the list of regions the U.S. Department of Agriculture (USDA) recognizes as free of foot-and-mouth disease, rinderpest, swine vesicular disease, classical swine fever, and African swine fever (notice of proposed rulemaking docket number APHIS-2009-0034). Council support is based on expert opinion presented by the Animal and Plant Health Inspection Service (APHIS) via report issued on January 16, 2009, which refers to the risk analysis procedure conducted in 2008.

The Council understands that in some instances the issuance of restrictive import regulations by USDA is necessary to protect the health and safety of the American people. However, trade limiting rules should only be implemented when there is scientific evidence supporting their existence.

According to the 2009 report above mentioned, APHIS concluded that the Brazilian state of Santa Catarina consistently achieves the level of disease freedom and veterinary infrastructure necessary to regionalization as described in 9 CFR part 92.2.

The Council also understands that Santa Catarina has plans to increase the number of government veterinarians to ensure adequate border controls.

The Council supports accomplishing regulatory objectives while minimizing unnecessary and negative impacts to trade and economic growth. The Council therefore supports the amendment of the regulation (9 CFR, Section 94), subject of this notice of proposed rulemaking.