

**Congress of the United States**  
**Washington, DC 20515**

September 19, 2014

Gene Dodaro  
Comptroller General of the United States  
U.S. Government Accountability Office  
441 G St NW  
Washington, D.C. 20548-0001

Dear Comptroller General Dodaro:

It has come to our attention that the Animal and Plant Health Inspection Service (APHIS) is considering rules that would allow the importation of chilled or frozen beef from regions within Brazil and northern Argentina into the United States. In addition, one of the proposed Argentina rules would allow the importation of live cattle. While we are staunch advocates for open markets and free trade, we will not ignore the fact that unfettered access of these products has the potential to cause significant harm to our domestic food supply.

USDA has a duty to ensure the appropriate regulation of all agricultural products coming into the United States including beef and cattle. There has been a great deal of concern from industry and consumers regarding the risk to the health of U.S. livestock associated with importation of meat products from regions in Brazil and northern Argentina, which are not considered to be free of Foot-and-Mouth Disease (FMD) by APHIS. For some time, FMD has plagued livestock in that region of the world. All of the research on this issue suggests that, "countries free from FMD that suffer an outbreak lose between 0.3% to 0.6% of their gross domestic product."<sup>1</sup> Since FMD is such a highly transmissible disease, it is considered to be the most economically devastating livestock disease in the world.

As Members of the Texas Delegation concerned about biosecurity, we are officially requesting that a study be conducted by the Government Accountability Office (GAO) on the methodology and management controls used by APHIS in their site visit review process in general, and more specifically, in the site reviews for both Brazil and Argentina to verify animal health information. Additionally, we respectfully request that the GAO audit the risk assessments utilized in formulating both rules. It is imperative that the best interests of our nation's food supply, health and economy be properly considered. Until a timely and independent study can be conducted concerning the overall process, documentation, and risk assessments utilized to formulate these rules, we cannot support their implementation.

Thank you for your attention to this matter.

Sincerely,

cc: Adam Trzeciak, Inspector General, GAO  
The Honorable Thomas Vilsack, Secretary of Agriculture  
Kevin Shea, Administrator, USDA-APHIS

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<sup>1</sup> Pendelle, et al., The Economic Impacts of a Foot-and-Mouth Disease Outbreak: A Regional Analysis, *Journal of Agriculture and Applied Economics*, 39 (October 2007), 19-33.

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