

## **Summary of Comments Received Regarding the Revised SFCP June 2013**

APHIS appreciates all comments received regarding our intention to revise the Scrapie Flock Certification Program (SFCP). Following is a summary of the comments that raised substantive issues. Each was carefully considered.

1. One commenter noted that recent scientific reports have identified a risk of scrapie transmission by milk and colostrum. APHIS agrees that in recent years compelling scientific evidence has indicated that sheep or goat milk or colostrum or products derived from them may pose a risk. We therefore revised the SFCP standards to require that all Export category use sheep or goat milk, colostrum, or milk- or colostrum-derived products from only Export flocks with equal or greater status in the program. This change does not affect Export flocks that use cow's milk or colostrum or products derived from cow's milk or colostrum. Few SFCP participants will be impacted by this change, as our analysis indicates that very few producers utilize such products from other flocks.
2. One commenter raised the issue of allowing the use of male animals from non-participating flocks for breeding, because there is increasing evidence that male animals may pose a risk for scrapie transmission. APHIS is not making any changes to the SFCP standards based on this comment since it is unclear based on current science how best to address this concern and the impact on participants may be significant. We will consider further stakeholder outreach on this issue in the future.
3. One commenter suggested that requiring sampling of all euthanized animals is unnecessarily time consuming and expensive, as it includes sampling all routine culls. Additionally, the commenter suggested that it is scientifically unnecessary to sample animals that are euthanized for poor condition or health-related conditions not associated with scrapie, such as mastitis or laminitis. APHIS agrees that all healthy cull animals in the Export category do not need to be scrapie tested, as long as they are examined for signs of scrapie within 30 days of the sale date. We therefore revised the SFCP standards to exempt the following animals from scrapie testing in Export flocks that have sampled at least 30 animals: cull animals (including those in research or industry settings) which undergo a pre-euthanasia examination, and exhibit no signs associated with scrapie or other clinical signs that would preclude their sale as cull animals. However, all animals in Export flocks that are found dead, that are euthanized for health-related reasons with signs associated with scrapie (neurologic dysfunction, wasting or alopecia), or that are not fit to be sold for slaughter must still be sampled for scrapie.
4. One commenter suggested that APHIS grandfather Complete Monitored flocks into the Export category with up to two years of status instead of up to five years of status. APHIS is not making any changes to the SFCP standards based on this comment. We have taken steps to mitigate the impact of our decision of grandfather Complete Monitored flocks into the Export category with up to five years of status. Canada is our largest sheep and goat import market. They have indicated to APHIS that they will accept animals that have been grandfathered into the Export category as long as the flock meets all Canadian import requirements. Among these, Export Monitored flocks that have been grandfathered in from the Complete Monitored category must certify that they have submitted all found dead animals for scrapie testing for at least two years.

5. One commenter noted that many participants in the Complete Monitored category do not wish to become Export Certified but do wish to contribute to scrapie eradication, and that the sampling requirement in the Export category is unduly burdensome and will drive many Complete Monitored flocks out of the program. The commenter suggested that APHIS should instead consider keeping the Complete Monitored category but reduce the frequency of inspections to every other year as an alternative cost-savings measure. APHIS appreciates the contribution Complete Monitored flocks have made toward scrapie eradication in the U.S. When we began evaluating how to reduce costs associated with the SFCP, we considered reducing the frequency of inspections in the Complete Monitored category rather than eliminating it entirely. However, we elected not to follow this option because our analysis indicated that monitoring alone is not sufficient to certify a flock as free of classical scrapie. As noted in earlier communications, 0.5% of Complete Monitored flocks that reached Certified status have been found to be scrapie infected after certification. We therefore concluded that reducing the frequency of inspections, which would effectively reduce overall monitoring, would likely increase the risk of certifying infected flocks as being scrapie free.

Although the commenter did not suggest reducing the frequency of inspections in the Export category, it is important to note that this is not a prudent option for flocks in this category. The World Animal Health Organization (OIE) recommendations for demonstrating a scrapie free establishment include an annual inspection of the flock by an official veterinarian.

6. Finally, in addition to the changes we made to the SFCP standards in response to the public comments we received, we made minor edits that did not alter the program requirements to improve clarity.