



October 8, 2021

U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Regulatory Analysis and Development Division,
Station 3A-03.8Se 4700 River Road, Unit 18
Riverdale, MD 20737-1238

Submitted Electronically via Federal e-Rulemaking Portal:
<https://www.regulations.gov/docket/APHIS-2021-0061>

Re: Docket #APHIS-2021-0061-0001: Proposed Framework for Advancing Surveillance for SARS-CoV-2 and Other Emerging Zoonotic Diseases through the American Rescue Plan

To Whom It May Concern:

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit the following comments on the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Services (APHIS) proposed framework for advancing surveillance for SARS-CoV-2 and other emerging zoonotic diseases through the American Rescue Plan.

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs, including food safety, conservation, and fostering the economic vitality of our rural communities. Combating the spread of animal disease is also among our chief responsibilities. NASDA supports the funding and resources needed to maintain the robust state and federal animal health infrastructure necessary to facilitate early detection, surveillance, response, and control activities to prevent and mitigate both domestic and foreign animal diseases.

During the development of the Agriculture Improvement Act of 2018 (the 2018 farm bill), NASDA played a leading role in development and advocacy for a comprehensive program of animal disease prevention and management, including three critical components: disease surveillance, prevention, and rapid response. NASDA appreciates USDA's diligence in implementing each component of this vital program. The National Animal Health Laboratory Networks (NAHLN) has highlighted the importance of the linkage between animal and human diseases. Critically important is the capacity and flexibility of the NAHLN to support research to address any disease threats. NAHLN Laboratories, for example, have stepped in to help with COVID-19 testing and serves as a great example of the One-Health approach.



NASDA likewise led the effort in the 2018 Farm Bill to develop and enact a new funding mechanism for Animal Disease Preparedness and Response¹ which delivers funds through state agricultural departments to amplify animal disease surveillance, prevention, and control activities through a program that mirrors the very successful approach implemented by USDA to address plant pests and diseases. NASDA urges USDA to seek and allocate additional resources in support of this program.

NASDA has been an ardent supporter of the One Health approach to mitigate disease outbreak. COVID-19 underscored the importance of coordination and communication among state departments of agriculture and state departments of health for surveillance testing, detection, and response. Stronger coordination among the strategic national stockpile and veterinary stockpile should allow for a more cohesive approach to ensuring health officials are equipped with adequate medical supplies. Effective communication and planning between the state and federal levels among interagency departments is necessary to help prevent, mitigate and eradicate zoonotic diseases. NASDA recognizes that One Health resides at the intersection of all things living and many times the topics addressed tax the resources and authorities of any one department, agency or discipline to its limit complicating the ease with which comprehensive solutions can be established. NASDA members support participation in a One Health planning committee across multiple sectoral governmental agencies.

NASDA members fully support the USDA-APHIS proposal for an early warning system to alert public health partners to potentially prevent and limit the next zoonotic disease outbreak. NASDA supports a One Health mission of collaboration to accomplish the goal of safeguarding animal, public, and environmental health comprehensively.

The following comments provide suggested feedback to topics within the proposal:

- The partnership between NAHLN labs and public health laboratories in states is critical and should be strengthened.
- Identification and removal of any federal and state regulatory or resource roadblocks that may prevent NAHLN labs from helping our human health counterparts.
- Continue supporting the critical role of state departments of agriculture and state wildlife agencies working collaboratively to mitigate threat of zoonotic diseases.
- Preparation, collaboration and planning must begin now to mitigate the threat of the next pandemic.
- NASDA recommends elevating the One Health approach from a standing committee to a standard operating procedure to address complex animal, human and environmental challenges across the nation.

¹ <https://www.congress.gov/bill/115th-congress/house-bill/2/text> (Section 12101 of the Agriculture Improvement Act of 2018)



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- NASDA supports coordination between intergovernmental agencies and industry for a One Health approach for the preparation and response to disease outbreaks. NASDA encourages the strong relationship between USDA and other relevant federal agencies, including the CDC to collaborate on a One Health approach, in addition to supporting outbreaks associated with new or emerging diseases, or diseases affecting non-traditional livestock animals.
- Utilize the USDA Veterinary Services National Training and Education Program in providing outreach and resources to ensure an adequate animal health workforce is maintained.
- Continue disease prevention and mitigation efforts in major livestock species and highly susceptible populations where disease is transferred from close human and livestock interaction, while expanding resources and training programs for other species and wildlife, such as the spread of SARS-Co-2 in mink and rabbit hemorrhagic fever.

NASDA emphasizes the importance of collaboration in accomplishing the goals of One Health, as well as recognizing the need to broaden the scope of our activities to prepare for new diseases in other animal species. NASDA appreciates the opportunity to provide these comments and encourages USDA APHIS to support innovative partnerships with State and Federal Public Health and other relevant agencies when responding to zoonotic diseases in animals.

If you have questions, please contact Rebecca Barnett, Manager of Public Policy for NASDA (Rebecca.barnett@nasda.org; 571-429-6589).

Sincerely,

A handwritten signature in black ink, appearing to read "RJ Karney". The signature is fluid and cursive.

RJ Karney
Senior Director Public Policy