AVIAN HEALTH CONSULTING SERVICE
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Ms. Sally White
Director, International Equivalence Staff
Office of International Affairs
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250

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2006-0030
2006-0030-4
Dr. Barrett S. Cowen

07 APR 24 PM 2:13

RE: Food Safety and Inspection Service (FSIS), Docket No. FSIS-2006-0030, Eligibility of Chile to Export Poultry and Poultry Products to the United States, 72 Fed. Reg. 8293

Dear Ms. White:

I am writing in support of the FSIS proposed rule to add Chile to the list of countries eligible to export poultry and poultry products to the United States. Now that FSIS has completed reviews that demonstrate Chile's inspection standards, procedures, laws and regulations are equivalent to the USDA's Poultry Products Inspection Act and its implementing regulations, it is important to finalize the rule as soon as possible. Based on my academic training, poultry industry experience (see attached document) and interaction, as a technical advisor/consultant, with the Chilean Ministry of Agriculture [i.e., the Agricultural and Livestock Service (SAG), 1996] and one of Chile's larger poultry enterprises (1993 – present; including the 2002 avian influenza outbreak), I feel my enthusiastic support for this ruling, on behalf of the Chilean poultry industry, is justifiable.

Chile has exceptional sanitary resources in the poultry industry and a production system that is 100 percent vertically integrated. Chile also has high biosafety standards and geographic barriers that help to prevent the entry of diseases on the "A" list of the International Office of Epizootics (OIE). Poultry plants in Chile are expanding and updating their technology to comply with increasing world standards. Based on these facts, there is no reason to delay the granting of market access for Chilean poultry products.

Apart from Chile's geographic isolation from the introduction of animal diseases, the constant expansion and evolution of the poultry industry is a result, in part, of a strong investment in technology that has improved the efficiency of its processes and has developed environmentally sustainable activities. Additionally, Chile's compliance with the strict quality standards and import restrictions required by it current trading partners,

such as the European Union, the United States, Japan, South Korea, Mexico and China, shows that Chile can meet any reasonable sanitary or quality regulation anywhere in the world.

The Ministry of Agriculture, through SAG, is the Sanitary Authority responsible for preventing the entry of animal diseases, not known to occur in Chile, and makes a firm effort to maintain a disease-free status. It is the official agency in charge of product inspection and certification in support of its development, competitiveness, and sustainability.

A list of regulations and system controls is as follows:

- Good Practices
- HACCP System
- ISO Standards
- Integral Traceability Systems
- PABCO, official program of the government of Chile
- Epidemiological Monitoring
- Microbiological Control
- Residue Control

Chile's production capacity and efficiency is the result of a controlled environment and favorable climatic conditions. Additionally, vertical integration, present in many Chilean companies, is a major contributor to Chile's sustained growth. This integral process enables Chilean producers to maintain a strict level of product traceability and ensures product safety, quality, and reliability from the farm to the dinner plate.

The industry has invested heavily in state-of-the-art technology that will enhance sanitary and production efficiency as well as market expansion through the implementation of free trade agreement provisions.

Accordingly, I urge FSIS to act on the conclusions of the Docket N. FSIS-2006-0030 at the close of the April 27, 2007 public comment period and publish a final rule at the earliest possible date.

Sincerely,

Barrett S. Cowen

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♦ Summary of Qualifications

Forty-four years of experience as a microbiologist and animal health professional, conducting animal disease research in academia and with animal breeding, animal production and vaccine companies. Thirty-four years of experience providing national and international technical service support to the breeding, production and biologics industries, addressing issues such as vaccine development (e.g., CIA and HHS) and programming, salmonellosis, avian influenza, and biosecurity.

Additionally, good management and written and verbal communication skills as revealed in the accompanying work history and by many academic and industry publications and presentations.

♦ Selected Accomplishments

Basic and Applied Research; Academia

- Determined the nuclease activities of *Mycoplasma gallisepticum* as a function of culture age in different media.
- Clone purified and antigenically compared tissue culture adapted infectious bronchitis virus strains with a plaque-reduction virus-neutralization test.
- Improved upon a group I avian adenovirus serotyping procedure by introducing the use of pooled antisera in a virus-neutralization test.
- Evaluated "intermediate" forms of infectious bursal disease virus vaccines for their ability to break through maternal antibody.
- Evaluated the propagation of avian viruses in a continuous cell line (QT35) of Japanese quail origin.
- Examined the immune response of pheasants to various strains of cell-culture-propagated group II avian adenoviruses.
- Developed an antigen-capture ELISA for the rapid detection and identification of avian influenza.
- Conducted studies on a stunting syndrome of guinea fowl associated with a coronavirus infection.

Research and Technical Service Activities; Animal Production Industry

- Provided national and international technical service support for the breeding and production industries including, addressing problems with vaccine programming, salmonellosis, hydropericardium-hepatitis syndrome and avian influenza control, and biosecurity.
- Recommended and implemented the use of antigen-capture enzyme-linked immunosorbent assay for the eradication or reduction of lymphoid leukosis.
- Recommended and implemented the use of pressure differential dipping of breeder hatching eggs with gentamicin sulfate for the control of *Salmonella paratyphoid* organisms.
- Assisted with the design and provided oversight in the construction of a research and quality control laboratory for a primary broiler breeder.
- Developed a proposal for the commercialization of specific-pathogen-free chickens and eggs.

♦ Professional Experience

Senior Research Scientist and Director of Research 1997- 2001
BIOMUNE COMPANY, Lenexa, Kansas

- Provide leadership in the research and development of conventional live and inactivated viral vaccines for poultry and game birds.
- Supervise research laboratory support personnel.
- Provide technical support for customers.

Associate Professor and Coordinator 1982-1997
DEPARTMENT OF VETERINARY SCIENCE, THE PENNSYLVANIA STATE UNIVERSITY, University Park, Pennsylvania

- Coordinator of Wiley Laboratory and the avian disease research program. Developed and managed laboratory budgets ranging from $50–400 thousand per year and supervised up to seven laboratory and clerical personnel plus graduate students.
- Responsible for the production of selected vaccines for Pennsylvania's poultry and game bird industries.
- Provided virus isolation and identification services to the poultry diagnostic laboratory and participated in field investigation studies as a poultry extension specialist.
- Served as Chair or Member of numerous Department, College and professional committees.
- Developed poultry health and biosecurity programs and published technical bulletins in support of Pennsylvania's poultry industry.

Laboratory Director and Quality Control Manager 1978-1982
COBB INCORPORATED, Concord, Massachusetts

- Provided leadership for a research and quality control laboratory. Developed and managed a $250–300 thousand per year budget and supervised five full-time and two part-time personnel.
- Administered vaccination and serological and bacteriological monitoring programs for Cobb owned and contract breeder flocks.
- Provided technical service support for Cobb owned, contract and customer flocks.
- Responsible for conducting applied research to support the corporate practice of providing customers with a high quality product; e.g., *Salmonella paratyphoid* and lymphoid leukosis control, reduction or eradication.
- Responsible for the rearing and maintenance of Cobb owned specific-pathogen-free White Leghorn and White Plymouth Rock flocks.

Research Associate 1973-1978
DEPARTMENT OF AVIAN AND AQUATIC ANIMAL MEDICINE, NEW YORK STATE COLLEGE OF VETERINARY MEDICINE, CORNELL UNIVERSITY, Ithaca, New York

- Responsible for conducting basic and applied avian disease research.
- Assisted with Department instruction of senior veterinary students in microbiological laboratory procedures.

Research Specialist 1967-1973
DEPARTMENT OF AVIAN DISEASES, NEW YORK STATE COLLEGE OF VETERINARY MEDICINE, CORNELL UNIVERSITY, Ithaca, New York

- Responsible for conducting basic and applied avian disease research, including a Doctor of Philosophy research program on infectious bronchitis virus.

Graduate Assistant 1965-1967
DEPARTMENT OF ANIMAL SCIENCES, UNIVERSITY OF NEW HAMPSHIRE, Durham, New Hampshire

- Conducted basic research on *Mycoplasma gallisepticum* and supervised laboratory support personnel.

Laboratory Assistant 1963-1965
HUBBARD FARMS INCORPORATED, Walpole, New Hampshire

- Worked as a laboratory technician in the corporate research and quality control laboratory.

♦ Career-Related Activities

Consulting

- ✓ Provided technical advise to thirteen different national and international (e.g., Chile, Colombia, Ecuador, Mexico, India and Pakistan) organizations on an ad hoc or retainer basis during a twenty-four year period.

Presentations and Publications

- ✓ Presented papers at forty-five national and thirty-eight international technical and professional meetings.
- ✓ Published forty-eight refereed journal articles, one book chapter, and sixteen popular press articles.

Book, Manuscript and Grant Proposal Reviews

- ✓ Reviewed seventy-eight journal manuscripts, one book, and four grant proposals.

♦ Education

Doctor of Philosophy Degree in Veterinary Virology 1973
Cornell University, Ithaca, New York

Master of Science in Animal Science 1968
University of New Hampshire, Durham, New Hampshire

Bachelor of Science Degree in Agriculture 1963
University of Vermont, Burlington, Vermont

♦ Professional Associations and Honorary Societies

American Association of Avian Pathologist
American Society of Microbiology
Conference of Research Workers in Animal Diseases
World Veterinary Poultry Association
American Association of Veterinary Laboratory Diagnosticians, Inc.
Phi Kappa Phi
Sigma Xi

♦ Professional Honors and Awards

- **Poster Award Winner** of the American Association of Avian Pathologist Section of the 127th Annual American Veterinary Medical Association Meeting, San Antonio, Texas, July 21-25, 1990.
- **J. William Fulbright Foreign Scholarship** (Central American Republic Research Program; 1994-95 academic year), awarded, February 1994.
- Editorial Board, Avian Diseases, 1994-2003.
- Editorial Board, Journal of Applied Poultry Research, 1992-present.
- **Best Paper Award**, XIV Latin American Poultry Congress, Santiago, Chile, October, 10-13, 1995.
- **USDA licensed CIAV vaccines** (U.S. Vet. Lic. No. 368; patent pending); wing-web (**Circomune**) and water (**Circomune W**) administered products, 2001.
- **Member Emeritus,** Northeastern Conference on Avian Diseases, Presented at the 76th Annual Meeting, June 9-11, 2004, Pennsylvania State University, University Park, Pennsylvania.

♦ References and a List of Publications are available upon request