

Sap Comments (CDC)

From: Hooser, Stephen B. [shooser1@purdue.edu]
Sent: Monday, September 20, 2010 11:22 AM
To: Sap Comments (CDC)
Subject: Comments on the changes to the list of select agents and toxins

To whom It May Concern:

Re: 42 CFR Part 73
RIN 0920-AA34
**Public Health Security and
Bioterrorism Preparedness and
Response Act of 2002; Biennial Review
and Republication of the Select Agent
and Toxin List**

The American Board of Veterinary Toxicology (ABVT) is a group of specially trained veterinarians that strive to inform and educate the public, private practice veterinarians, veterinary medical students, and governmental agencies about toxicologic hazards to pets, livestock and wildlife. A number of our members are employed as veterinary toxicologists at state veterinary diagnostic laboratories and many are also members of the American Association of Veterinary Laboratory Diagnosticians (AAVLD).

The ABVT supports the tiering concept for select agents and toxins. In general, we agree tiering could allow for the application of different security measures for agents and toxins that pose a greater risk to animal and plant health. Those of us at veterinary diagnostic laboratories are particularly interested about Tier 1 designations because our laboratories must conduct tests/assays for some of these agents such as the mycotoxins, diacetoxyscirpenol (DAS) and T-2 toxin, and will require appropriate access to some of the agents as purified standards for testing purposes, or will have them submitted to the laboratories as contaminants from field cases. Some of these agents, such as, but not limited to, DAS, T-2 toxin, ricin, and botulinum toxin can be present in cases presented to veterinary diagnostic laboratories and diagnosticians routinely and responsibly handle these agents.

Thank you for consideration of our request to include ABVT in discussions and decisions related to tiering and Tier 1 agents and toxins. Please do not hesitate to contact me if you need further information.

Sincerely,

Steve Hooser

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