

Sap Comments (CDC)

From: Jones, Franca R LCDR OSD ATL [Franca.Jones@osd.mil]
Sent: Thursday, August 19, 2010 11:25 AM
To: Sap Comments (CDC)
Subject: Comments on the changes to the list of select agents and toxins

Please see below for my comments on the following. My comments are personal in nature and do not necessarily represent those of the Department of Defense.

(1) the appropriateness of the current HHS list of select agents and toxins,

Comment: The current list is tailored to the public health threat and only partially addresses the threat that the agents could be used as bioterrorism agent. For this reason, the list should be reduced to those agents with high probability for use in a bioterrorism attack.

(2) whether there are other agents or toxins that should be added to the HHS list,

Comment: No new agents should be added to the list, however, consideration should be given to strains of agents that do not exist in nature that may be more virulent or resistant to therapeutics

(3) whether agents or toxins currently on the HHS list should be deleted from the list,

Comment: Yes, the list should be reduced- see comment under 1 above

(4) whether the HHS select agent list should be tiered based on the relative bioterrorism risk of each agent or toxin, and

Comment: Yes, the list should be tiered. First, agents with low probability for use as bioterrorism agents should be removed from the list. Recommend two tiers. Agents in top tier should not be available in nature and should be difficult to prevent, treat. Second tier follows current select agent regulations.

(5) whether the security requirements for agents in the highest tier should be further stratified based on type of use or other factors.

Comment: Security requirements should be more prescriptive for top tier. Further, depending on use (testing, evaluation, aerosolizing, etc.) consideration for additional security measures should be given.

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