



NATIONAL ASSEMBLY of STATE ANIMAL HEALTH OFFICIALS

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November 18, 2009

Thomas R. Frieden, MD, MPH
Director
Centers for Disease Control and Prevention
Administrator, Agency for Toxic Substances and Disease Registry
Centers for Disease Control and Prevention
1600 Clifton Rd
Atlanta, GA 30333

Dear Dr. Frieden:

I am writing on behalf of the National Assembly to request the immediate removal of *Brucella abortus* from listing as a Select Agent by your agency. Our organization strongly supports the removal of *B. abortus* from the list because the benefits of removal far exceed any risk mitigated by continuing the listing.

The National Assembly provides an opportunity for state animal health officials to speak with one voice in matters of science and public policy in the realm of animal health. This body is comprised of the Chief Animal Health Officials of the 50 states. As such, all are directly involved in the prevention, control and regulation of *B. abortus*.

Many of our members operate laboratories where diagnostics involving *B. abortus* are part of daily operations and many regulate biologic products used in prevention, control and diagnostic activities pertaining to *B. abortus*. Additionally, each of the 50 members has a strong interest in the robust pursuit of national research into the epidemiology of the disease, the ecology of the organism, host factors, additional diagnostic tools and biologics in order to continue to keep this disease out of the livestock in their states.

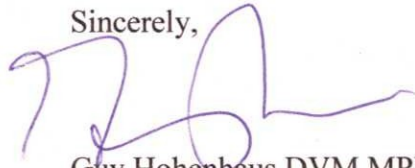
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This robust research and development in matters pertaining to *B. abortus* has been an unintended casualty of the Select Agent listing process. In the years since the organism was listed as a Select Agent, research and development has been greatly diminished. Our members understand and support the intent and reasoning behind the Select Agent list, however it is apparent that the risks to public and animal health posed by *B. abortus* are small in comparison to the costs, particularly with respect to lost research and development opportunities. Existing biosecurity level 3 (BSL-3) facilities do not have the capacity to conduct Select Agent brucellosis research with sufficient numbers of animals to generate statistically valid research results. Furthermore, it is simply too expensive to construct and maintain enough high capacity BSL-3 facilities to conduct the necessary research on *B. abortus* while it is listed as a Select Agent.

As you know, the US has an endemic focus of *B. abortus* in wildlife of the Greater Yellowstone Area. The infected wildlife place the US cattle herd at significant risk for infection. The financial liability to governments, industry and ultimately the taxpayer are substantial. At the same time, the public health risk from that focus of disease has been and remains largely uncontained but appears to be negligible. Substantial research and development is required to further control and eventually eradicate *B. abortus* from this wildlife reservoir. Given the clear benefit of more rapid and cost effective research, we contend that any risk currently mitigated by the *B. abortus* listing as a Select Agent is fully manageable without such listing.

Thank you for your consideration of this matter. Please do not hesitate to contact me should there be questions or if you require additional information. Our members and I stand ready to assist in any manner to accomplish the important goal of removing *B. abortus* from select agent listing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Guy Hohenhaus', with a long horizontal flourish extending to the right.

Guy Hohenhaus DVM MPH
President

cc: Secretary Thomas Vilsack, US Department of Agriculture
Secretary Kathleen Sebelius, US Department of Health and Human Services
Admiral Regina Benjamin, Surgeon General of the United States
Dr. John Clifford, Deputy Administrator Animal and Plant Health Inspection Service
Dr. Donald Hansen, National Assembly Vice President
National Assembly Membership