

Sap Comments (CDC)

From: Hanna, Michael [mhanna@umich.edu]
Sent: Friday, August 06, 2010 10:04 AM
To: Hanna, Michael; Sap Comments (CDC)
Subject: RE: Comments on the changes to the list of select agents and toxins
Attachments: 090807 - He response to ISATTAC on Brucella Attenuation.pdf

[Follow-up support documents as indicated in original message.](#)

From: Hanna, Michael
Sent: Friday, August 06, 2010 9:55 AM
To: 'SAPcomments@cdc.gov'
Subject: Comments on the changes to the list of select agents and toxins

Brucella sp.: Serious consideration should be given to downgrading the risk assessment for vaccine strains of Brucella. Only Strain 19 and RB51 have been excluded as licensed vaccine products, but other research strains having equal levels of biological attenuation have not been excluded. The University of Michigan has attempted to have such exclusion considered on more than one occasion and it seems to us that the only criteria that the ISATTAC will accept for exclusion is licensed drug status. We submit that this extremely high benchmark is not logical nor necessary to protect the public interest, and is disadvantageous to research on this important pathogen in the United States. **I include copies of past correspondence with DSAT on this matter.**