

Sap Comments (CDC)

From: Richard Larson [RLarson@salud.unm.edu]
Sent: Wednesday, August 18, 2010 2:49 PM
To: Sap Comments (CDC)
Subject: To Whom It May Concern:

To Whom It May Concern:

Below is our feedback to your latest SAP. Thank you for the opportunity.

Regards,
Richard

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505-272-6950

Re: Federal Register Vol. 75. No. 139 / Wednesday, July 21, 2010 / Proposed Rules

The CDC topics of interest/concern and the University of New Mexico's comments are as follows:

1. The appropriateness of the current HHS list of select agents and toxins,

No comment

2. Whether there are other agents or toxins that should be added to the HHS list,

No recommendations

3. Whether agents or toxins currently on the HHS list should be deleted from the list,

No recommendations

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

The University of New Mexico supports the American Biological Safety Association (ABSA) position paper addressed to the *Working Group on Strengthening the Biosecurity of the United States, May 13-14, 2009*.

- *ABSA believes that the current Select Agent Regulations are sufficiently rigorous and effective. They should not be made more prescriptive.*
- *Stratification of select agents is of no value; each entity must develop site-specific written security, biosafety and incident response plans.*

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

The University of New Mexico believes that further stratification of select agents at the federal level would increase ambiguity of the current list resulting in more complexity and unnecessarily be more burdensome to our biomedical research mission. Any further stratification should remain a responsibility of our local Institutional Biosafety Committee, on a case-by-case basis.