



# WYOMING WOOL GROWERS ASSOCIATION

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September 15, 2016

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Docket No. APHIS-2009-0095

Importation of Sheep, Goats and Certain Other Ruminants  
Proposed Rule

These comments on APHIS's proposed rule to allow the importation of Sheep, Goats and Certain Other Ruminants are being submitted on behalf of the Wyoming Wool Growers Association (WWGA). Since 1905, the Wyoming Wool Growers Association has represented Wyoming's sheep and wool industry. We have served to protect and preserve the interests of sheep and livestock producers throughout the state and continue to advocate for the businesses, communities, and families that constitute the agricultural industry in Wyoming.

We appreciate APHIS publishing this proposed rule to amend the regulations and revise the conditions that govern the importation of sheep and goats and their products, especially with regard to bovine spongiform encephalopathy (BSE) and scrapie. Trade in sheep and sheep products has been severely restricted since 2003, particularly in the area of germ plasm and meat and we believe the proposed changes will help to ease those restrictions.

For many years, the U.S. sheep industry, along with federal and state animal health regulatory partners, has invested heavily in the National Scrapie Eradication Program (NSEP), including more than \$200 million invested by the federal government. A key feature of this successful program includes a strong surveillance program combined with quick flock action that has resulted in a very low incidence level of scrapie. This is very important to sheep producers in Wyoming, where we have not had a positive Scrapie case or had a Scrapie-positive animal traced back to the state in several years. For this reason, while we appreciate the effort to allow importation of sheep and goat and other ruminants we adamantly urge APHIS to maintain its diligent import controls regarding Scrapie.

With regard to the proposed rule, the WWGA would like to associate our comments with those submitted by the American Sheep Industry Association and the Wyoming State Veterinarian Jim Logan. We agree with these commenters that much of the proposed changes in the draft rule are scientifically sound and appropriate and lend our support for many of the proposed changes. However there are some areas that we believe need further attention. In addition, we add the following comment to theirs.

We note that APHIS is proposing that sheep and goats entering “terminal feedlots” will not be required to be permanently identified. While we agree that there is no scrapie transmission risk associated with lambs that are being fed for slaughter, ewe lambs do, on occasion, move out of feedlots and enter breeding flocks due to value differences. We believe this presents a regulatory enforcement problem and an unnecessary risk. The only practical tools for assuring that ALL animals in a terminal feedlot are either slaughtered or die and are properly disposed of are records and inspection. Scrapie entered the U.S. in the late 1940s via a relatively small number of imported breeding animals and became endemic in a relatively short period of time. We recommend that APHIS require all imported sexually intact sheep and goats be permanently identified in a tamper-proof manner, such as a nose brand, regardless of their age or intended use.

We hope you will carefully consider our comments and those submitted by the Wyoming State Veterinarian and the ASI for information. We are hopeful that when a final rule is published, market access for U.S. producers and industries will be enhanced

Sincerely,

A handwritten signature in cursive script that reads "Amy W. Hendrickson".

Amy W. Hendrickson  
Executive Director

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