

May 22, 2015

Mr. Senzeni Zokwana  
Minister of Agriculture, Forestry and Fisheries  
Republic of South Africa.



Dear Mr. Minister:

On behalf of the National Pork Producers Council of the United States (NPPC) and our member producers, I am writing to request that you give serious consideration to the concerns of our industry regarding unnecessarily burdensome animal health restrictions being placed on imports of U.S. pork by your Ministry. We understand very well the need for governments to ensure the health of domestic livestock herds and a safe supply of food to their consumers. We work with our government as tirelessly as any pork industry in the world to ensure that this is the case in the United States. However, we also work extremely hard to ensure that our pork trade is not unjustifiably restricted by sanitary measures, when we know that such measures are unjustified and may actually be serving as disguised trade barriers.

Of principal concern is the time and temperature requirement that the South African Ministry of Agriculture imposes on our pork as a mitigation against trichinae. This requirement is costly and places an unnecessary burden on U.S. exporters. It also ignores the reality that trichinae has ceased to be a food safety concern in the United States as a result of a strong biosecurity program for pork production over the past 30 years that effectively reduced the prevalence of *Trichinella* in the U.S. swine herd to negligible levels.

Through testing by the National Animal Health Monitoring and Surveillance program and a separate testing program for exports to the European Union, the prevalence of trichinae in the U.S. herd is estimated at less than one infected animal per 1 million slaughtered, and since 2000 no positive animals from any commercial farm have been found by either of these testing regimes. That assessment has been shared and discussed with your Ministry officials.

Furthermore, the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) prepared a risk assessment demonstrating the United States has a negligible risk for trichinae in pork offered for export. The USDA's Food Safety and Inspection Service does not require any mitigation for trichinae in pork sold for domestic consumption, and data from the U.S. Centers for Disease Control and Prevention indicates a very low risk for exposure of U.S. consumers to trichinae from commercial pork products.

Moreover, to allay any further concerns raised by your Ministry, APHIS has offered to certify that pork exported to South Africa would only come from farms participating in the Pork Quality Assurance Plus program, an industry-sponsored program with additional biosecurity measures to prevent exposure of pigs to sources of trichinae. Although this certification has been accepted by a number of other countries, it has been rejected by South Africa. We can only conclude, therefore, that the Ministry's insistence on time and temperature mitigations for trichinae is based on factors other than a legitimate concern about trichinae in the U.S. swine herd.

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We are also concerned about the continued insistence by the Ministry on risk mitigations for Porcine Reproductive and Respiratory Syndrome (PRRS). There has never been a case of PRRS transmitted through exported pork products, and the Ministry's insistence on mitigations for PRRS in pork imports from the United States is not based on science.

In an attempt to work out a mutually acceptable arrangement with the Ministry, APHIS proposed a list of over 100 products for export to South Africa that would provide further assurance of minimal risk of PRRS transmission. These are products that are commonly exported to over 140 other countries around the world. Only 15 of the proposed products were accepted by your Ministry; 82 of them would have to be further processed and 10 would require a more definitive description before the Ministry would consider them for import eligibility.

As you may know, NPPC is an active supporter of freer and more open trade and has strongly supported free trade agreements entered into by the United States, as well as non-reciprocal U.S. tariff preference programs such as the African Growth and Opportunity Act (AGOA) and the Generalized System of Preference (GSP). We have not attempted to tie our specific trade concerns to our support for those programs, but we will continue to make our concerns known to our government and will press for solutions that involve science-based mitigations and are compatible with WTO obligations. We urge you to instruct officials in your Ministry to work with U.S. officials to help accomplish this.

Sincerely,

A handwritten signature in black ink that reads "Ron Prestage". The signature is written in a cursive, slightly slanted style.

Dr. Ron Prestage, DVM  
President  
National Pork Producers Council

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