Feb 18, 2013

APHIS
Veterinary Services
4700 River Road Unit 43, Riverdale, MD
20737–1231
(301) 851–3435

RE: A New Approach for Managing Swine Brucellosis and Swine Pseudorabies Virus: Veterinary Services Proposed Action Plan

Dear Veterinary Services,

The American Association of Zoo Veterinarians (AAZV) is an organization of veterinarians and allied professionals dedicated to the health and well-being of both captive and free ranging wildlife. We represent animal health professionals from various disciplines especially regarding zoo and wildlife health. In our many professional capacities, AAZV members provide care for and perform and participate in health and disease research in animals and ecosystems in captive and wild environments. It is within this expertise that we respectfully offer comments regarding “A New Approach for Managing Swine Brucellosis and Swine Pseudorabies Virus: Veterinary Services Proposed Action Plan”.

First and foremost we would like to thank Veterinary Services for streamlining regulatory programs, focusing on risk based scenarios, while embracing a flexible regulatory framework. We would also like to take a moment at this time to clarify the points of the most recent document that are most pertinent to our organization.

The Executive Summary does not mention non-domestic suidae / tayassuidae as a separate classification. Movement of non-domestic suid species, some of which are endangered or threatened, is necessary to maintain viable breeding collections of these
species for conservation, exhibition, and education. These species are not involved in commercial suid production, and are unlikely to come in contact with domestic suids involved in commerce. When non-domestic suidae/tayassuidae species are involved in direct movement between locations for zoological purposes it does not involve exposure to domestic suids or commercial domestic suid facilities. This is especially reinforced when transfers occur between zoological institutions that have met independently verified high professional standards (i.e. routine veterinary care, necropsies, preventive care programs, positive animal identification, tracking and record keeping) through accreditation by professional organizations. Consideration should be given for an exemption of these zoological transfers from these regulations. The AAZV is respectfully requesting that the “Comprehensive National Surveillance Plan” include a classification for non-domestic suidae/tayassuidae, especially those for movement between these types of zoological institutions, which could potentially move infected or exposed suidae/tayassuidae to another accredited zoo that could be considered similar to a “quarantine feedlot” as already defined. Many zoological institutions already manage imported suidae/tayassuidae in a “permanent post-entry quarantine” condition (PPQ) as specified by USDA for similar reasons.

In closing, we would like to thank you again for all the previous collaboration APHIS/Veterinary Services have afforded to accredited zoos. This was most evident as was recently stated in the Chronic Wasting Disease documents “we plan to work with zoos on how much movement might occur, and we may develop a proposal for stakeholder consideration to establish a zoo movement protocol in the future”. At this time we hope this pledge will continue as we work through the various changes in regulatory programs together for future species and diseases. Thank you for your time.

Sincerely,

Leah Greer, DVM, Diplomate ACZM
LAW Committee Chair, American Association of Zoo Veterinarians

Paul Calle, VMD, Diplomate ACZM
President, American Association of Zoo Veterinarians
Chief Veterinarian