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March 31, 2008

Docket No. APHIS-2007-0095
Regulatory Analysis and Development, PPD
Animal and Plant Health Inspection Service
Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

**Re: R-CALF USA Comments on Docket No. APHIS-2007-0095:
Importation of Cattle from Mexico; Addition of Port at San Luis, AZ**

The Ranchers-Cattlemen Action Legal Fund – United Stockgrowers of America (R-CALF USA) appreciates this opportunity to provide comments on the proposed rule on importation of cattle from Mexico and the addition of a port of entry for such cattle at San Luis, AZ. The proposed rule was published as Docket No. APHIS-2007-0095.¹

R-CALF USA represents thousands of U.S. cattle producers on domestic and international trade and marketing issues. R-CALF USA, a national, non-profit organization, is dedicated to ensuring the continued profitability and viability of the U.S. cattle industry. R-CALF USA's membership consists primarily of cow-calf operators, cattle backgrounders, and feedlot owners. Its members are located in 47 states, and the organization has approximately 60 local and state association affiliates, from both cattle and farm organizations. Various main street businesses are associate members of R-CALF USA.

R-CALF USA commented upon an earlier version of this rule that was proposed in late 2005. We appreciate the fact that the earlier rule was subsequently withdrawn so that APHIS could perform an analysis of the animal health risks associated with the proposed changes, as requested by R-CALF USA.² Furthermore, we are pleased that, as a result of this risk analysis, APHIS has decided to continue to prohibit the movement of cattle from Mexico infested with fever ticks or exposed to fever ticks or tick-borne diseases into the tick quarantine zone in the state of Texas.³

¹ See *Importation of Cattle from Mexico; Addition of Port at San Luis, AZ*, 73 Fed. Reg. 5,132 (Dep't Agriculture, Jan. 29, 2008) (hereinafter "*Proposed Rule*").

² See *Proposed Rule* at 5,132.

³ *Id.* at 5,133.

However, after carefully reviewing the new proposed rule change and underlying risk analysis, R-CALF USA is deeply concerned that the risks of allowing the entry of cattle infested with fever ticks or exposed to fever ticks or tick-borne diseases through an additional port of entry at San Luis, AZ have not been fully evaluated and continue to substantially outweigh any benefit that may result from this change. R-CALF USA therefore respectfully requests that the proposed rule be withdrawn until a more comprehensive risk assessment is completed.

I. Existing Fever Tick Situation and Seriousness of Animal Health Risk

As a preliminary matter, it is important that any assessment of the risks posed by fever ticks and tick-borne diseases to the U.S. cattle herd begin with an evaluation of the current disease situation and the potential costs of aggravating that situation. At a time when fever tick infestation in the United States is becoming more severe rather than less, and when U.S. import standards related to tick-borne illnesses already fall below international standards, R-CALF USA believes that APHIS should be examining how to strengthen U.S. import standards and animal health regulations in this area – not attempting to loosen those standards.

As noted in the APHIS risk assessment performed for this proposed rule change, the number of tick infestations in the designated tick quarantine zones of Texas has increased in recent years, reaching an historic high in 2005.⁴ More recently, fever ticks have spread into areas formerly free of fever ticks in five counties along the Texas-Mexico border.⁵ In response, the state of Texas has created more than a thousand square miles of temporary fever tick quarantine zones in addition to the 852 square mile permanent quarantine zone, and the state is working together with USDA to step up efforts to eradicate fever ticks.⁶ In March of this year, the USDA decided to invest more than \$5 million in emergency funding to implement a fever tick eradication program in response to the growing infestation.⁷

Prevention of more widespread fever tick infestations is vital given the high cost that such an infestation would impose on the U.S. cattle industry. The APHIS risk assessment notes that infection of cattle with tick-borne diseases causes severe weight loss, a drop in milk production, and possible abortion.⁸ Up to 50 percent or more of the

⁴ USDA, *Evaluation of the Risk Associated with Proposed Changes to Rule 9 CFR 93.427(b)(2): Importation of Cattle from States in Mexico Where Rhipicephalus (Boophilus) annulatus and microplus Ticks (Fever Ticks) Exist* (Dec. 2006) (hereinafter “*APHIS Risk Assessment*”) at 16.

⁵ Texas Animal Health Commission News Release, “Stakes High in Fight Against the Cattle Fever Tick; Pest Could Spread Coast-to-Coast.” Copy attached at Exhibit 1.

⁶ *Id.*

⁷ “Texas Ag Commissioner Staples Supports Fever Tick Eradication Program,” *Southwest Farm Press* (Mar. 25, 2008). Copy attached at Exhibit 2.

⁸ *APHIS Risk Assessment* at 9.

animals infected with tick-borne diseases may die, and even those that survive will have a protracted recovery and may continue to serve as a source of infection for herd mates.⁹ In fact, it took the United States 55 years to officially eradicate fever ticks from the country after first establishing an eradication program in 1906.¹⁰ According to news reports, the recent increase in funding to address spreading fever tick infestations in Texas came in response to concerns that failure to effectively quarantine newly infested areas could lead to the spread of ticks across the country, “resulting in losses of \$1 billion a year” to the industry.¹¹

In addition to the animal health and direct economic losses potentially resulting from the spread of fever ticks, the APHIS risk assessment finds that infection of the U.S. herd with tick-borne diseases will also lead to the curtailment of imports of live U.S. cattle by one or more international trading partners.¹² In the five years before U.S. live cattle exports were limited by many trading partners due to bovine spongiform encephalopathy (from 1998 to 2002), the U.S. exported more than \$200 million worth of live cattle per year on average.¹³

Restrictions on U.S. exports of live cattle under such a scenario may be particularly difficult to avoid given that the U.S. does not currently follow the recommendations of the World Organization for Animal Health (“OIE”) regarding the importation of animals from countries infected with tick-borne disease. A comparison of OIE and U.S. standards is below. As the table demonstrates, while the U.S. requires inspection for signs of disease and tick infestation, as well as dip designed to eliminate ticks, the U.S. falls short of OIE standards in that it does not limit entry to those animals that have either: 1) resided since birth in a zone recognized as free of tick fever and been treated with an acaricide prior to shipment; or 2) have tested negative for tick fever in the preceding month and been treated with an acaricide prior to shipment. It is worth noting that, as part of its risk assessment for this proposed rule, APHIS was unable to find any quality assurance data that examined the efficacy of the two acaricide dips and physical tick examination currently required by U.S. import regulations.¹⁴ Importantly, the failure of the U.S. to meet OIE standards can be used by trading partners to justify their own restrictions on U.S. imports in the event of an outbreak of tick fever in the United States.

⁹ *Id.*

¹⁰ *Id.* at 7.

¹¹ “Texas Ag Commissioner Staples Supports Fever Tick Eradication Program,” *Southwest Farm Press* (Mar. 25, 2008). Copy attached at Exhibit 2.

¹² *APHIS Risk Assessment* at 22.

¹³ Dept. of Commerce, Census Bureau, Foreign Trade Stats for HTS 0102. Data attached at Exhibit 3.

¹⁴ *APHIS Risk Assessment* at 12.

Standards for Cattle Imports from Countries Infected with Tick-Borne Disease

OIE Requirements ¹⁵	U.S. Import Requirements ¹⁶
Presentation of an international veterinary certificate attesting that the animal showed no clinical sign of tick fever on the day of shipment; and	Presentation of an international veterinary certificate showing that the veterinarian issuing the certificate has inspected the animal and found it free from any evidence of communicable disease, and, as far as it has been possible to determine, the animal has not been exposed to diseases <u>other than</u> tick fever during the 60 days immediately preceding movement to the port of entry; and
Presentation of an international veterinary certificate attesting that the animal was treated with an acaricide prior to shipment; and	Presentation of an international veterinary certificate attesting that the animal was treated with an acaricide prior to shipment (cattle are dipped again at the port of entry); and
Presentation of an international veterinary certificate attesting that the animal was completely free of ticks; and	Presentation of an international veterinary certificate showing that the veterinarian issuing the certificate has inspected the cattle and found them free from fever ticks (cattle are inspected for ticks again at the port of entry).
Presentation of an international veterinary certificate attesting that the animal was, since birth, resident in a zone known to be free of tick fever for the past two years; OR Presentation of an international veterinary certificate attesting that the animal was subjected to a diagnostic test for tick fever with negative results during 30 days prior to shipment; and was treated with an effective antiprotozoal agent such as imidocarb or amicarbalide.	<u>No comparable requirement.</u> Entry of animals from zones that are not free of tick fever, that have not tested negative for tick fever, and that have not been treated with an antiprotozoal agent, is allowed as long as the requirements above are met.

¹⁵ See OIE Terrestrial Animal Health Code (2007) at Article 2.3.8.2. Copy attached at Exhibit 4.

¹⁶ See 19 C.F.R. § 93.427(b)(2).

Taking into account the recent spread of fever tick infestation in the state of Texas, the high animal health costs and economic costs of an outbreak of tick fever in the United States, and the negative trade implications of any such outbreak given the failure of the U.S. to adhere to OIE standards, R-CALF USA believes that it is inappropriate to consider any weakening of U.S. import regulations relating to fever ticks and tick-borne diseases at this juncture. Instead, R-CALF USA supports an aggressive program that aims to, first, effectively contain and eradicate infestations of fever ticks in the U.S., and, second, prevent the introduction of tick-borne illnesses into the U.S. through the strengthening of U.S. import standards.

Unfortunately, since APHIS is instead proposing to open another land port to the entry of cattle from Mexico, we now turn to our concerns with that proposal.

II. Risks Associated with Adding a Port of Entry at San Luis, AZ

R-CALF USA is concerned that the proposed rule and underlying risk assessment fail to adequately document the risks associated with adding a port of entry for Mexican cattle at San Luis, AZ. As the risk assessment acknowledges, cattle infected with tick fever can be found in northern, southern, and central regions of Mexico and APHIS does not recognize any state in Mexico as a tick-free area.¹⁷ Thus, the risk assessment finds that there is a high probability that some cattle entering from Mexico will be persistently infected with tick fever and there is a low, but not zero, probability of fever ticks entering on cattle from Mexico.¹⁸ The risk assessment concludes:

Undoubtedly, a portion of the animals from any consignment of cattle originating from these States [where fever ticks exist] in Mexico will be persistently infected ... and serve as the source of infection for susceptible US-origin cattle, provided ... vector ticks effectively transmit the pathogen to naïve cattle.¹⁹

The proposed rule finds these risks justify continuing the prohibition upon the entry of cattle from Mexico into the tick quarantine zone in Texas.²⁰ Due to the prevalence of fever ticks and tick-borne disease in Mexico, the risk of cattle from Mexico being infected with tick fever and/or infested with fever ticks is the same regardless of the port of entry through which cattle enter the United States, and this risk should also weigh against opening a new port of entry at San Luis, AZ.

¹⁷ *APHIS Risk Assessment* at 11 – 12.

¹⁸ *Id.* at 13.

¹⁹ *Id.* at 23.

²⁰ *Proposed Rule* at 5,133.

The proposed rule nevertheless justifies adding a new port of entry at San Luis, AZ based on the following propositions: 1) there will be no net increase in total U.S. cattle imports from Mexico due to the opening of the San Luis port, only a shift in the entry of cattle from pre-existing ports to San Luis; 2) the risk of establishment of fever ticks in Arizona itself is limited to certain micro-habitats in the state and cattle are not expected to remain in the state; and 3) the addition of San Luis as a port will not change the intended destination of cattle imported from Mexico.²¹ In addition, the underlying risk assessment appears to underestimate the potential costs associated with an outbreak of tick fever if the above assumptions do not hold true. Each of these points is addressed in turn below.

Risk due to increased net imports: The only justification APHIS offers for its assertion that the addition of a port at San Luis will not result in a net increase in imports of cattle from Mexico is a personal communication with a senior staff veterinarian within APHIS.²² Yet the proposed rule itself acknowledges that adding a port of entry at San Luis will “make the movement of cattle from Mexico to the United States less logistically challenging for both exporters and importers.”²³ The proposed rule also claims that the primary benefit of the proposed rule will be a “net positive impact” for “cattle importers that find it advantageous to use the San Luis port.”²⁴ Finally, APHIS states that the proposed rule would make “the importation of cattle from Mexico that have been infested with fever ticks or tick-borne diseases more readily accessible” and “reduce the transport costs from the port of entry.”²⁵

Thus, it appears that the primary purpose of the proposed rule – and, indeed, its main claimed benefit – would be to lower the cost of importing cattle from Mexico, by making such importation less logistically challenging, more advantageous, more readily accessible, and less costly. Since demand for imports is a function of the cost of those imports relative to the cost of domestic products, any measure which has the effect of reducing the costs of importation would be expected to increase demand for those imports. In addition, the proposed rule would not result in any commensurate increase in the costs of importation through other ports. Indeed, APHIS notes that it may actually “reduce operational delays when the demand for imports is beyond the capacity of the[se other] facilities.”²⁶ Thus, the opening of any additional entry points for imports would be expected to lower the net cost of importation and increase the net level of such imports. The proposed rule does not address this basic rule of economics, and there does not

²¹ *Id.* at 5,133 – 5,134.

²² *APHIS Risk Assessment* at 12, 14.

²³ *Proposed Rule* at 5,133 – 5,134.

²⁴ *Id.* at 5,134.

²⁵ *Id.*

²⁶ *Id.*

appear to be any basis for the conclusion that net imports would remain unaffected by the reduction of import costs resulting from opening the San Luis port.

Since APHIS has found that there is a high probability of Mexican cattle entering that are infected with tick fever, and also a probability of animals entering that are infested with fever ticks, any increase in net cattle imports from Mexico will increase the risk of introduction of fever ticks and tick-borne diseases into the United States. The extent of this risk is unknown, because the risk assessment does not purport to examine the likely impact of opening a new port on demand for Mexican cattle. The failure to adequately assess this risk undermines much of the rest of the APHIS risk assessment, and thus the basis for the proposed rule.

Risk of tick establishment in Arizona micro-habitats: The proposed rule acknowledges that the existence of certain micro-habitats within Arizona create the potential for the establishment of fever ticks within the state.²⁷ However, APHIS states that it does not expect cattle entering through the port of San Luis would remain in Arizona, because the state does not currently receive cattle from Mexico.²⁸ Again, there appears to be little basis for this conclusion in the risk assessment, which states that no cattle should remain in Arizona “[i]f current trends remain the same.”²⁹ The risk assessment also states that if current trends do not remain the same, the risk of establishment of fever ticks in Arizona’s micro-climates “cannot be ruled out.”³⁰ There is no attempt to analyze which scenario is more likely, particularly in light of the reductions in the costs of importation discussed above. The proposed rule assumes the first scenario – no change in current demand trends – will occur rather than the second, with no explanation of the basis for this conclusion.³¹ Furthermore, the risk assessment and proposed rule do not discuss what risks of fever tick establishment may be posed by transporting cattle from Mexico through Arizona to other states, even if the ultimate destination of those cattle is not Arizona itself.

Risks in states receiving cattle imported from Mexico: The proposed rule is based partly on the conclusion that the intended destination of cattle imported from Mexico would not change as the result of opening an additional port of entry in San Luis.³² Again, this assessment appears to be based on the assumption that current conditions will continue unchanged rather than any analysis of the expected impact that a reduction in logistical difficulties and transport costs may have on import demand patterns.

²⁷ *Id.*

²⁸ *Id.*

²⁹ *APHIS Risk Assessment* at 24.

³⁰ *Id.*

³¹ *Proposed Rule* at 5,134.

³² *Proposed Rule* at 5,134.

The conclusion that intended destinations for Mexican cattle would not change also contradicts other findings underlying the proposed rule change. As stated in the proposed rule:

The proposed changes would benefit certain cattle operations in the United States by making the importation of cattle from Mexico ... more readily accessible, and by reducing transportation costs from the port of entry. The proposed port of entry for these cattle at San Luis, AZ, would benefit cattle operations to the west of the current ports of entry. Because the cattle would be moved over shorter distances, transport costs would be lower.³³

If import costs are reduced for cattle operations to the west of current ports of entry, those operations' demand for imports is likely to increase relative to the demand for such cattle in other parts of the country. This could mean an increase in demand in states that do not currently receive cattle from Mexico, resulting in new imports into those states, as well as an increase in demand in states such as California that already receive some Mexican cattle but are likely to receive more if transport costs fall. It is worth noting that these areas of the country also fall below the latitude 36° N, and thus are more likely to provide an environment where fever ticks, and the diseases they carry, can thrive.

Moreover, even if the distribution of imported cattle among states within the U.S. does not change, any net increase in cattle imports overall as a result of the rule would increase the risk of fever tick infestation and the spread of tick-borne disease to U.S. cattle. There is already empirical evidence to support this concern: the previously mentioned spread of fever tick infestations both within and outside the fever tick quarantine zone, which reached an historical high in 2005,³⁴ occurred immediately following the increase of more than 130,000 Mexican cattle imports into the U.S. through pre-existing ports of entry between calendar years 2003 and 2004.³⁵ Moreover, as acknowledged by APHIS, five of the twelve states that currently receive cattle from Mexico are located below the latitude 36° N, and thus pose a higher risk of the establishment of fever ticks.³⁶ In the presence of such ticks, the risk of exposure of U.S. cattle to tick-borne diseases is "high."³⁷ R-CALF USA notes its concern that states that provide such a hospitable environment for fever ticks currently receive Mexican-origin cattle that pose such a high risk of infestation to the U.S. herd, especially in light of the fact that, as discussed above, U.S. import regulations fall short of international standards

³³ *Id.* at 5,134.

³⁴ *See supra* at p. 2.

³⁵ *See* U.S. Department of Agriculture, Economic Research Service, Livestock and Meat Trade Data. Data attached at Exhibit 5.

³⁶ *Id.* at 5,133.

³⁷ *APHIS Risk Assessment* at 24.

and no quality assurance data exist regarding the efficacy of these measures. It is particularly problematic that the delivery of Mexican cattle to such states has been allowed through the modification of APHIS permitting procedures without a corresponding change in regulations under a notice and comment rulemaking process.³⁸

Finally, the risk assessment does not address the apparent contradiction between its finding that the risk of fever tick establishment is not high in states above the latitude 36° N and the fact that there have been outbreaks of tick fever in countries above that latitude in Europe. While R-CALF USA recognizes that different species of ticks can serve as disease vectors in different environments,³⁹ it is worth noting that a number of European countries above this latitude have had persistent outbreaks of tick fever in recent years.⁴⁰ The risk assessment should be revised to address this fact and explain how its evaluation of the risk of tick fever in northern U.S. states relates to the existence of tick fever in European countries with similar climactic conditions.

Costs of a Tick Fever Outbreak: While not addressed explicitly in the proposed rule, the APHIS risk assessment limits its examination of the costs of eradicating tick fever, were an outbreak to occur, to the costs of eradicating ticks from infested herds, estimated at \$649.59 per head.⁴¹ This estimate is inadequate for several reasons. First, as the risk assessment admits, this does not include the replacement costs of animals lost to tick fever.⁴² Second, the estimate does not include the costs of lost export markets for live cattle, particularly in light of the failure of U.S. import regulations to meet OIE standards, as discussed above. Finally, the per head cost of tick eradication is based on FY 2005 data for the fever tick eradication program in the state of Texas.⁴³ As noted above, since that time fever tick infestations have actually grown in Texas, requiring the devotion of significant additional resources to address the problem. Thus, even the costs of tick eradication alone appear to be outdated and overly conservative.

IV. Conclusion

R-CALF USA is concerned that the proposed rule poses unjustifiable risks to animal health and to the economic well-being of the U.S. cattle industry. Though R-CALF USA appreciates that APHIS prepared a risk assessment before re-proposing this rule, the assessment does not appear to fully evaluate all of the risks associated with the

³⁸ See *Proposed Rule* at 5,133.

³⁹ See *APHIS Risk Assessment* at 10.

⁴⁰ See OIE Animal Health Status reports regarding outbreaks of tick fever in Finland (latitude 64° N), the Netherlands (latitude 52° N), Slovenia (latitude 46° N) and Romania (latitude 46° N), attached at Exhibit 6.

⁴¹ *APHIS Risk Assessment* at 23.

⁴² *Id.*

⁴³ *Id.*

proposed rule. In particular, the assessment appears to be based on assumptions regarding the impact of the rule on import demand and import volumes that are contradicted by the very justification for the rule, which is to reduce the costs associated with importing cattle from Mexico. The assessment also relies on problematic assumptions regarding hospitable environments for fever ticks and the costs of a potential outbreak of tick fever. For all of these reasons, R-CALF USA respectfully requests that the proposed rule be withdrawn.

It is vital that any rule proposing to lower U.S. import standards relating to tick fever first be subjected to a rigorous risk assessment that adequately addresses each of the concerns enumerated above. Moreover, given the recent spread of fever tick infestations in the state of Texas and the gap between U.S. and OIE import standards related to tick fever, R-CALF USA urges APHIS to consider strengthening safeguards against the introduction of this disease rather than weakening them at this time. R-CALF USA would be eager to work with APHIS to ensure that U.S. import regulations reflect international standards and to promote an aggressive domestic program of fever tick eradication.

Thank you for this opportunity to present our views on this important matter.

Sincerely,

A handwritten signature in black ink, reading "R. M. Thornsberry" followed by a stylized monogram "DVM".

R. M. Thornsberry, D.V.M.

President, R-CALF USA Board of Directors

EXHIBIT 1

News Release

Texas Animal Health Commission

Box 12966 * Austin, Texas 78711 * (800) 550-8242 * FAX (512) 719-0719

Bob Hillman, DVM * Executive Director

For info, contact Carla Everett, information officer, at 1-800-550-8242, ext. 710, or ceverett@tahc.state.tx.us

For immediate release---

Stakes High in Fight Against the Cattle Fever Tick; Pest Could Spread Coast-to-Coast

Livestock health officials say it could cost upwards of \$13 million and take as long as two years to stop an incursion of fever ticks into the formerly fever tick free areas of five counties along the Texas-Mexico border. The fever tick, less than a 1/8-inch long, is capable of carrying and transmitting 'babesia,' a blood parasite deadly to cattle.

"For most of the country, the fever tick has been pushed out of sight, out of mind, since the 1940s. This tick, however, is capable of transmitting a foreign animal disease and it's sitting in our backyard," said Dr. Bob Hillman, Texas' state veterinarian and executive director of the Texas Animal Health Commission (TAHC), the state's livestock and poultry health regulatory agency.

"If we can't stop it, the fever tick could spread from coast to coast, except the arid lands of New Mexico and Arizona, and as far north as Washington D.C.," stressed Dr. Hillman. "As the tick spreads, so will the need for personnel and resources. Win the battle along the Rio Grande in Texas, and other states won't have to fight the war."

The TAHC has placed temporary fever tick quarantines on 1116.3 square miles in five Texas border counties, including parts of Starr and Zapata counties, and a contiguous area encompassing parts of Maverick, Dimmit and Webb Counties. In addition, an 852-square mile permanent quarantine zone butts up against the Rio Grande from Del Rio to Brownsville and is under the management of the U.S. Department of Agriculture's 60-person Fever Tick Force.

The USDA, which is adding up to 30 temporary tick inspectors, and the TAHC, which has detailed inspectors to south Texas on a rotating basis, are working with ranchers to locate, 'corral' and eradicate the tick. In this area about the size of Delaware, all cattle, horses, penned deer, llamas, camels and any other species that can host the tick are being manually inspected --or "scratched"--by TAHC or USDA inspectors.

If animals in these quarantined areas are moved from their premises, they'll undergo another "scratch" inspection, then be dipped or sprayed, and permitted for movement. Because horses can give ticks a lift, these animals are put under 14-day inspections and treatment, if they're moved routinely from their home base.

When fever tick-infested livestock are detected, the premises are quarantined for six to nine months. As of early October, this included at least 25 premises in the temporary quarantine areas and about 56 premises in the permanent quarantine zone.

--more--

Add one/Stakes High in Fight Against Cattle Fever Tick

Cattle remaining on tick-infested premises must be inspected and dipped every 14 days or treated with doramectin every 28 days. Alternatively, the animals may be moved to a new site, but only after undergoing two consecutive tick-free inspections and dippings. A movement permit then is issued, and the cattle must be transported immediately.

“The USDA has made \$340,000 available for immediate fever tick needs in south Texas, and the state legislature granted the TAHC an extra \$150,000 to purchase additional Co-Ral, the acaricide used for dipping vats and in spray rigs,” Dr. Hillman said. He reported that a USDA assessment concluded that to eliminate fever ticks from the temporary preventive quarantine areas, at least \$13 million was needed to hire additional personnel, repair or replace worn out portable tick dipping equipment, purchase new spray rigs and supplies, and procure other essential equipment.

“To get a handle on potential fever tick spread, the TAHC field staff also is tracing the movement of cattle from infested premises in the temporary quarantine area within the past year,” Dr. Hillman noted. So far, this has involved nearly 800 animals, of which about 459 have been located, inspected and found to be fever tick-free. Some were found in Kansas or Texas Panhandle feed yards, and others were scattered across the state and to two other states.

“Many of these animals had been moved as calves without any identification, except the livestock market back tag, or clearly defined destination,” he said. “This slows down our work, but we don’t give up until all avenues are exhausted.”

“The fever tick, by itself, will not cause disease. However, cattle tick fever is imminent if the fever tick is carrying babesia, and transmits it to cattle that are ‘naïve,’ meaning they have no resistance to the organism that quickly breaks down red blood cells,” said Dr. Hillman. “There are two potential scenarios with fever ticks that keep the TAHC, the Tick Force and border ranchers awake at night.”

The first scenario, explained Dr. Hillman, involves Mexico, where fever ticks and babesia have not been eradicated. Young calves there may be exposed to the babesia, survive the disease and develop immunity, but continue to carry the organism.

“Even if Mexican feeder cattle carry babesia, they will not cause a disease problem — unless there is fever tick involvement,” said Dr. Hillman, setting the scene for the scenario. “Mexican-origin feeder cattle enter the U.S. under strict USDA fever tick inspection and dipping requirements. To keep them away from fever ticks, the TAHC also requires an “M”-brand on Mexican-imported cattle and prohibits these animals from entering the permanent quarantine zone.”

“If fever ticks are moved to sites where Mexican feeder cattle are pastured, the pests may pick up babesia. The babesia infected female tick transmits the disease to the next generation of fever ticks. Only one element then would be missing from the dangerous disease equation — U.S. cattle with no immunity to the babesia,” noted Dr. Hillman. “If native US cattle, which are susceptible to babesiosis or ‘cattle tick fever,’ are infested with babesia-infected fever ticks, then disease transmission to the native cattle will occur. Most likely, this will cause significant death loss of native cattle. It’s crucial to keep the fever tick pushed beyond the border, and support and fund surveillance activities in the permanent fever tick quarantine zone.”

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Add two/Stakes High in Fight Against Cattle Fever Tick

Dr. Hillman said the second scenario involves wildlife as effective alternative hosts and sources for movement of ticks into Texas from Mexico and from the permanent quarantine zone to the free area of Texas. For once, noted Dr. Hillman, the beleaguered feral (wild) hog is not implicated. Fever ticks have not acclimated to swine, goats, sheep or dogs. On the other hand, elk, white-tailed deer, nilgai and red deer, serve as effective hosts for fever ticks, but aren't affected by babesia.

"Free-ranging cervids don't respect national borders, shallow rivers, low fences, quarantines, or permits for movement," he said. "Wildlife hosts may crisscross the Rio Grande, hauling in fever ticks. Right now, wildlife presents the greatest risk for fever tick movement."

In spring 2007, more than 30 nilgai were depopulated in the Lower Rio Grande Valley National Wildlife Refuge, due to fever tick infestation. Twenty-eight of the 42 free-ranging white-tailed deer that were trapped and examined this year also were "ticky."

"Treating wildlife is a tricky proposition, because current methods are limited to feeding cervids ivermectin-treated corn or drawing them to 'four-poster' stations where they rub against pyrethrin-treated posts, which transfers the chemical," he said. "Ivermectin use requires a 60-day withholding period prior to slaughter or harvest, so wildlife feeding treatments will be delayed until hunting season ends."

In the meantime, the USDA or TAHC must inspect, treat and permit the movement of hides from deer or exotic hoof stock harvested on tick-infested or exposed premises. (Meat may be moved without inspection.) To avoid the possibility of transporting fever ticks, ranchers and hunters are urged to practice good sanitary measures when leaving a ranch. Brush off clothing to dislodge any ticks that may be on the fabric. Clean off boots and shake out jackets or items that have been on the ground.

"The fever tick is not a human health threat," said Dr. Hillman. "But be careful. Don't transport ticks to new sites. Getting and keeping the fever tick out of Texas and the U.S. is critical for disease control and our continued ability to move livestock without restrictions."

"If we are ultimately to be successful in our battle against the fever tick and 'cattle tick fever,' we must eliminate the current fever tick incursions in the free areas of Texas, then push the pest back into Mexico. To accomplish this, we must acquire resources necessary to fulfill the long-range fever tick eradication plan, fund research and develop additional treatment products and methods. We also must aid our Mexican neighbors in their fight against the fever tick and 'cattle tick fever,'" concluded Dr. Hillman.

EXHIBIT 2

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Commissioner Staples supports fever tick eradication program

Mar 25, 2008 9:53 AM

Texas Agriculture Commissioner Todd Staples announced his support of the U.S. Department of Agriculture's decision to invest more than \$5 million in emergency funding to implement a fever tick eradication program.

"I am pleased to report that the U.S. Department of Agriculture has responded to our state's critical needs," Commissioner Staples said. "The eradication program is essential to maintain a strong cattle industry. Texans are appreciative of this important partnership with the federal government."

Fever ticks are capable of carrying and transmitting a tiny parasite that destroys red blood cells in cattle. This causes the disease, known as "cattle tick fever," which can kill up to 90 percent of infected cattle, and it's the reason the Texas Animal Health Commission (TAHC) was created in 1893.

Although TAHC has permanently quarantined 852 square miles through eight south Texas counties to contain the pest, Texas is experiencing increased fever tick infestations, prompting the agency to impose additional temporary quarantines. The latest stretches across five Texas border counties – Starr, Zapata, Maverick, Dimmit and Webb – covering roughly 1,100 square miles. Without quarantines the ticks could spread throughout the nation, resulting in losses of \$1 billion a year to the beef industry.

"I congratulate the Texas Animal Health Commission for its diligent work to defend Texas cattlemen against the harm this pest can do to their herds and ultimately the Texas economy," Commissioner Staples said.

TAHC initially requested \$13.3 million federal funds to stop the incursion of the fever tick in the formerly tick free areas. Although the actual \$5 million allotment fell short of the requested amount, Commissioner Staples commended USDA for making this issue a priority.

"I personally thank Under Secretary Bruce Knight for his commitment to this issue and for touring the fever tick zone last week to get a first-hand view of the challenges our producers face in treating this pest."

Additional funding will provide more people, surveillance, training and treatments to ensure the containment and early detection of new infestations. More mounted inspectors will patrol against livestock harboring ticks crossing into Texas from Mexico. Additional animal health technicians will control outbreaks and surveillance outside the permanent quarantine zone.

Find this article at:

<http://www.southwestfarmpress.com/livestock/eradication-program-0325/index.html>



Check the box to include the list of links referenced in the article.

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EXHIBIT 3

HTS - 0102: BOVINE ANIMALS, LIVE
FAS Value by FAS Value
For ALL Countries

U.S. Total Exports

Annual Data

Country	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007
	<i>In 1,000 Dollars</i>									
Mexico	85,645	57,842	80,705	103,360	74,830	22,667	781	837	951	15,330
Canada	63,000	108,467	180,234	155,684	50,111	27,063	4,909	4,639	15,055	15,319
Saudi Arabia	3,363	1,932	0	0	0	1,784	0	0	8,973	10,506
Turkey	0	0	114	550	0	1,699	0	0	0	5,492
Korea	179	448	696	993	333	1,456	44	0	430	423
Honduras	41	0	8	3	72	0	0	0	0	302
Thailand	60	0	0	34	83	0	0	0	64	212
Jamaica	0	0	0	0	6	0	5	0	0	163
Guyana	0	0	0	0	0	0	0	0	0	82
Guatemala	0	50	0	0	40	0	0	0	59	82
Bermuda	0	0	0	0	0	0	0	0	51	40
Hong Kong	56	0	4	0	0	0	0	0	0	36
Taiwan	3	0	82	9	5	0	0	0	0	36
Panama	43	35	179	155	127	909	0	0	0	23
Japan	746	775	1,006	1,525	825	1,060	15	42	0	18
Subtotal :	153,137	169,549	263,028	262,313	126,433	56,639	5,754	5,518	25,583	48,064
All Other:	9,769	4,518	8,699	8,485	4,411	8,230	98	1,734	978	34
Total	162,906	174,068	271,727	270,798	130,844	64,869	5,852	7,252	26,561	48,097

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

EXHIBIT 4



Terrestrial Animal Health Code (2007)

[PART 2.](#)
[..«](#) [»..](#)
[SECTION 2.3.](#)
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[CHAPTER 2.3.8.](#)
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CHAPTER 2.3.8.

BOVINE BABESIOSIS

Article 2.3.8.1.

Standards for diagnostic tests and vaccines are described in the *Terrestrial Manual*.

Article 2.3.8.2.

When importing from countries considered infected with bovine babesiosis, *Veterinary Authorities* of free countries should require:

for cattle

the presentation of an *international veterinary certificate* attesting that the animals:

1. showed no clinical sign of bovine babesiosis on the day of shipment; and
2. were, since birth, resident in a zone known to be free of bovine babesiosis for the previous 2 years;

OR

3. showed no clinical sign of bovine babesiosis on the day of shipment; and
4. were subjected to a diagnostic test for bovine babesiosis with negative results during 30 days prior to shipment; and
5. were treated with an effective drug such as imidocarb as a single dose injection at 2 mg/kg or amicarbalide at 10 mg/kg (under study);

AND

in either of the above cases:

6. were treated with an acaricide prior to shipment and were completely free of ticks.

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EXHIBIT 5



United States Department of Agriculture

Economic Research Service

The Economics of Food, Farming, Natural Resources, and Rural America

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Data Sets

Livestock and Meat Trade Data

Cattle: Annual and cumulative year-to-date U.S. trade (head)

[Data by Year](#) | [Data by Month](#)[All Tables](#)[Excel](#) | [PDF](#) | [All Years and Countries](#)[Cattle](#) | [Beef and veal](#)

Cattle: Annual and cumulative year-to-date U.S. trade (head)

Import/export, country code and name		2003	2004	2005	2006	2007	Jan 07	Jan 08
1/								
Cattle imports, total	2010Mexico	1,239,531	1,370,476	1,256,404	1,256,973	1,090,094	38,290	29,508
	1220Canada	512,353	135	559,134	1,031,870	1,404,871	111,305	156,938
	Other countries	12	0	0	0	0	0	0
	Total	1,751,896	1,370,611	1,815,538	2,288,843	2,494,965	149,595	186,446
Cattle imports, 400-700 pounds	2010Mexico	474,126	606,224	542,919	516,103	521,109	16,919	11,580
	1220Canada	12,520		85,496	74,329	113,112	8,509	13,764
	Other countries	0	0	0	0	0	0	0
	Total	486,646	606,224	628,415	590,432	634,221	25,428	25,344
Cattle imports, over 700 pounds for slaughter	1220Canada	354,044		319,199	703,894	849,315	74,782	99,596
	2010Mexico	8,284	3,242	4,543	3,379	2,162	138	
	Other countries	0	0	0	0	0	0	0
	Total	362,328	3,242	323,742	707,273	851,477	74,920	99,596
Cattle imports, over 700 pounds total	1220Canada	439,016		460,814	938,285	1,275,183	101,917	134,999
	2010Mexico	15,436	20,829	14,006	11,337	23,075	202	81
	Other countries	0	0	0	0	0	0	0
	Total	454,452	20,829	474,820	949,622	1,298,258	102,119	135,080
Cattle exports	1220Canada	68,394	14,246	19,406	36,918	42,224	3,748	3,597
	2010Mexico	22,437	1,365	1,003	727	13,779		7,459
	5170Saudi Arabia	531			3,537	4,159		
	5600Indonesia				7,148			
	5490Thailand				765	2,250		
	Other countries	7,456	110	1,198	583	2,097	0	10
	Total	98,818	15,721	21,607	49,678	64,509	3,748	11,066

1/ Countries are ranked by the sum of their trade for all full years shown.

Source: ERS calculations using data from U.S. Department of Commerce, Bureau of the Census.

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EXHIBIT 6

EUROPE / 2004 / Bovine babesiosis

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Andorra	(1995)									
Austria	...									
Azerbaijan	...									
Belarus	+	bov	4	4	4	*				
Belgium	-									
Bosnia and Herzegovina	-									
Bulgaria	-									
Croatia	...									
Cyprus	0000	bov				Cn				
Czech Republic	-	bov				*				
Denmark	(2000)									
Estonia	+()	bov	*				
Finland	+()	bov	...	31	...	*				
Former Yug. Rep. of Macedonia	+()	bov	*				
France	+	bov					
Georgia	(1997)									
Germany	+	bov					
Greece	+()	bov	17	57	8					
Hungary	...									
Iceland	0000									
Ireland	+	bov					
Italy	+	bov	1	10	4	*				

Kosovo (Serbia and Montenegro)	...									
Latvia	(09/1988)	bov				*				
Liechtenstein	-									
Lithuania	0000	bov				* Su				
Luxembourg	0000									
Malta	(2001)									
Moldavia	-	***				* Te				
Netherlands	+	bov	9	9	...					
Norway	+	bov	*				
Poland	...									
Portugal	+	bov	...	12	...					
Romania	+()	bov	4	63	0	Te Qf				
Russia	+	bov	6	101	4	* Te Cn				N.
Serbia and Montenegro	0000									
Slovakia	-									
Slovenia	+	bov	42	47	...	*				
Spain	+()	bov	2	3	0	Su				
Sweden	+	bov					
Switzerland	0000									
Turkey	...									
U.K./Great Britain	+	bov					
U.K./Isle of Man	...									
U.K./Jersey	0000									
U.K./ Northern Ireland	+	bov					
Ukraine	+()	bov	1	4	0	* Te Qi				

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Andorra	(1995)									
Austria	...									
Belarus	+	bov	6	117	8	*		4		
Belgium	-									
Bosnia and Herzegovina	-									
Bulgaria	-									
Croatia	...									
Cyprus	0000	bov				Cn				
Czech Republic	-									
Denmark	(2000)									
Estonia	+()	bov	* V			16	
Finland	+()	bov	...	42	...	*				
Former Yug. Rep. of Macedonia	+()	bov	*				
France	+	bov					
Georgia	(1997)									
Germany	+	bov					
Greece	+()	bov	32	199	35					
Hungary	...									
Iceland	0000									
Ireland	+	bov					
Italy	(2002)	bov				*				
Latvia	(09/1988)	bov				*				
Liechtenstein	-									
Lithuania	0000	bov				Su				

Luxembourg	0000									
Malta	(2001)									
Moldavia	-	***				* Cr				
Netherlands	+	bov	3	3	...					
Norway	+	bov	*				
Poland	...									
Portugal	+	bov	...	40	...	Cn Qf				
Romania	+()	bov	31	61	0	Te Qf				
Russia	+	bov	9	82	15	* Cn Te			33600	
Serbia and Montenegro	0000									
Slovakia	-									
Slovenia	+	bov	8	8	1	*				
Spain	...									
Sweden	+	bov	V			17000	
Switzerland	0000									
Turkey	...									
U.K./Great Britain	+	bov					N.
U.K./Guernsey	0000									
U.K./Isle of Man	...									
U.K./Jersey	0000									
U.K./Northern Ireland	+	bov					
Ukraine	(06/2001)	bov				* Te Qi				

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Andorra	(1995)									
Armenia	-									
Austria	...									
Belarus	+	bov	7	59	7	*				
Belgium	-									
Bulgaria	-									
Cyprus	0000	bov				Cn				
Czech Republic	-									
Denmark	(2000)									
Estonia	+()	bov	* V			22	
Finland	+()	bov	...	74	...	*				
Former Yug. Rep. of Macedonia	+()	bov					
France	+	bov					
Georgia	(1997)									
Germany	+	bov					
Greece	+	bov	25	189	24					
Greenland	0000									
Hungary	...									
Iceland	0000									
Ireland	+	bov					
Italy	+	bov	1	2	2	*				
Latvia	(09/1988)	bov				*				
Liechtenstein	-									
Lithuania	0000	bov				Su				

Luxembourg	0000									
Malta	(2001)									
Moldavia	-	bov				* Cr				
Netherlands	(1994)									
Norway	+	bov					
Portugal	+	bov	...	9	...	Cn Qf				
Romania	+()	bov	15	42	...	Te Qf				
Russia	+	bov	15	163	11	* Cn Te				
Serbia and Montenegro	0000									
Slovakia	-	***				*				
Slovenia	0000									
Spain	...									
Sweden	+	bov	* V			...	
Switzerland	0000									
Turkey	...									
U.K./Great Britain	0000									
U.K./Guernsey	0000	bov				* Qf				
		buf				* Qf				
U.K./Isle of Man	...									
U.K./Northern Ireland	+	bov					
Ukraine	(06/2001)	bov				* Te Qi				

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Andorra	(1995)									
Armenia	-									
Austria	...									
Azerbaijan	+	bov	27	227		Cn				
Belarus	(1996)	bov				*				
Belgium	-									
Bosnia and Herzegovina	-									
Bulgaria	-									
Croatia	...									
Cyprus	0000	bov				Cn				
Czech Republic	-									
Denmark	(2000)									
Estonia	+()	bov	* V			160	
Finland	+()	bov	...	51	...	*				
Former Yug. Rep. of Macedonia	+()	bov					
France	+	bov					
Georgia	(1997)									
Germany	+	bov					
Greece	+	bov	29	148	22					
Greenland	0000									
Hungary	...									
Iceland	0000									
Ireland	+	bov					

Latvia	(09/1988)	bov				*				
Lithuania	0000	bov				* Su				
Luxembourg	0000									
Malta	?	bov					
Moldavia	-	***				* Cr Te				
Netherlands	(1994)									
Norway	+	bov	1	1	...					
Portugal	+	bov	...	30	...	Cn Qf				
Romania	+()	bov	Te Qf				
Russia	+	bov	21	219	5	* Cn Te				
Serbia and Montenegro	0000									
Slovakia	-	***				*				
Slovenia	0000									
Spain	...									
Sweden	+	bov	* V			...	
Switzerland	0000									
Turkey	...									
U.K./Great Britain	0000									
U.K./Jersey	0000									
U.K./Northern Ireland	+	bov					
Ukraine	+()	bov	1	66	0	* Te Qi				

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Albania	+	bov	5	24	2					
Andorra	(1995)									
Armenia	-	bov								
Austria	...									
Azerbaijan	(04/1993)									
Belarus	(1996)	bov	3	178	2	*				
Belgium	-									
Bulgaria	-									
Croatia	...									
Cyprus	0000	bov				Cn				
Czech Republic	-									
Denmark	+()	bov					
Estonia	+()	bov	* V			279	
Finland	+()	bov	...	79	...	*				
Former Yug. Rep. of Macedonia	+()	bov	* Cn				
France	+	bov					
Georgia	(1997)									
Germany	+	bov					
Greece	+	bov	16	94	25					
Greenland	0000									
Hungary	...									
Iceland	0000									
Ireland	+	bov					
Italy	...									

Latvia	(09/1988)	bov				*				
Lithuania	0000	bov				*				
Luxembourg	0000									
Moldavia	-	bov				* Cr Qf Qi S Te Vp		24		
Netherlands	(1994)									
Norway	+	bov					
Portugal	+	bov	...	97	...	Cn Qf				
Romania	+()	bov	Te				
Russia	+	bov	26	586	20	* Cn Te				
Slovakia	-	***				*				
Slovenia	0000									
Spain	...									
Sweden	+	bov	* V			...	
Switzerland	0000									
U.K./Great Britain	0000									
U.K./Northern Ireland	+	bov					
Ukraine	(08/1999)	bov				* Te Qi				

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Albania	+	bov	2	5	0	Sp		5		
Andorra	(1995)									
Austria	+()	bov					
Azerbaijan	(04/1993)	bov				Cn				
Belgium	-									
Bulgaria	-									
Croatia	...									
Cyprus	0000	bov				Cn				
Czech Republic	-									
Denmark	+()	bov					
Estonia	+()	bov	*				
Finland	+()	bov	...	61	...	*				
Former Yug. Rep. of Macedonia	+()	bov	* Cn				
France	+	bov					
Germany	+	bov					
Greece	+	bov	29	77	11	Sp * Te	1			
Greenland	0000									
Hungary	...									
Iceland	0000									
Ireland	+	bov					
Italy	...									
Latvia	(09/1988)	bov				*				
Lithuania	0000	bov				S * V	
Luxembourg	0000									

Malta	?	bov					
Moldavia	-	***				* Te				
Netherlands	(1994)									
Norway	+()	bov	...	30	...					
Portugal	+	bov	...	43	...	Cn Qf				
Romania	+()	bov	Te				
Russia	+	bov	25	640	50	* Cn Te				
Slovakia	-	***				*				
Slovenia	0000									
Spain	...									
Sweden	+	bov	* V			...	
Switzerland	0000									
Turkey	...									
U.K./Great Britain	0000									
U.K./Guernsey	0000	bov				* Qf				
U.K./Isle of Man	...									
U.K./Jersey	0000									
U.K./Northern Ireland	+	bov					
Ukraine	+()	bov	5	265	14	* Te Qi				

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Albania	+	bov	2	5	2	S		2		
Andorra	(1995)									
Austria	+()	bov					
Azerbaijan	(04/1993)	bov				* Cn				
Belarus	(1996)	bov				*				
Belgium	-									
Croatia	+	bov					
Cyprus	0000	bov				Cn				
Czech Republic	-	bov				*				
Denmark	+()	bov					
Estonia	+()	bov	*				
Finland	+()	bov	66	66	0	*				
France	+	bov					
Germany	+	bov					
Greece	+	bov	35	130	21	* Te				
Greenland	0000									
Hungary	...									
Iceland	0000									
Ireland	+	bov					
Italy	...									
Latvia	(09/1988)	bov				*				
Lithuania	0000	bov				*				
Luxembourg	0000	bov				Qf				
Malta	?	bov					
Moldavia	-	***				* Te				
Netherlands	(1994)									

Norway	+()	bov	...	17	...					
Poland	...									
Portugal	+	bov	...	51	...	Cn Qf				
Romania	+()	bov	Te				
Russia	+()	bov	12	261	22	* Cn Te				
Slovakia	-	***				*				
Slovenia	0000									
Spain	+	bov	0					
Sweden	+()	bov	...	2500	0	V			25000	N.
Switzerland	0000									
Turkey	...									
U.K./Great Britain	0000	bov								
U.K./Guernsey	0000	bov				* Qf				
U.K./Isle of Man	...									
U.K./Jersey	0000									
U.K./Northern Ireland	+	bov					
Ukraine	(07/1997)	bov				Qi * Te				

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Albania	+	bov	4	10	3	S	3	3	0	
Andorra	(1995)									
Armenia	-									
Austria	+()	bov					
Azerbaijan	(04/1993)									
Belarus	(1996)	bov				* Qf				
Belgium	-									
Bulgaria	(1992)									
Croatia	+	bov					
Cyprus	0000	bov				Cn				
Czech Republic	-	bov				*				
Denmark	+()	bov					
Estonia	+()	bov	*				
Finland	+()	bov	98	98	0	*				
Former Yug. Rep. of Macedonia	+	bov	3	5	0	* Qf Qi				
France	+	bov					
Germany	+	bov					
Greece	+	bov	41	123	38	* Te	0	0	0	
Greenland	0000									
Hungary	...									
Iceland	0000									
Ireland	+	bov					
Italy	...									
Latvia	(09/1988)	bov				*				

Lithuania	0000	bov				Qf				
Luxembourg	0000	bov				Qf				
Malta	?	bov	1	1	1					
		buf	0	0	0					
		fau	0	0	0					
Moldavia	-	***				* Te				
Netherlands	(1994)									
Norway	+()	bov					
Poland	+	bov					
Portugal	+	bov	...	44	...	Cn Qf				
Romania	+()	Te				
Russia	+()	bov	22	500	50	* Cn Te				
Slovakia	-	***				*				
Slovenia	0000									
Spain	+	bov					
Sweden	+()	bov	V			34171	
Switzerland	0000									
Turkey	...									
U.K./Great Britain	0000	bov								N.
U.K./Guernsey	0000	bov				* Qf				
U.K./Isle of Man	...									
U.K./Jersey	0000									
U.K./Northern Ireland	+	bov					
Ukraine	+()	bov	2	107	6	Qi * Te				

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Country/ Territory	Occur.	Spe	Number of			Control measures	Number of animals			Note
			outbreaks	cases	deaths		destroyed	slaughtered	vaccinated	
Albania	+	bov	5	79	2	T tv	6			
Austria	+()	bov	V				N.
Azerbaijan	(1993)	bov								
Belarus	+	bov	2	4	...	* T tv				
Belgium	-	bov								
Bosnia and Herzegovina	0000	bov								
Bulgaria	(1992)	bov				* Pa T				
Croatia	+	bov					
Cyprus	0000	bov				Cn				
Czech Republic	-	bov								
Denmark	+()	bov					
Estonia	+()	bov	T te *				
Finland	+	bov	*				
Former Yug. Rep. of Macedonia	(1994)	bov				Cn T *				
		buf				Cn T *				
France	+	bov	T				
Georgia	+	bov	25	4500	...					
Germany	+	bov	T				
Greece	+()	bov	41	111	43	Cn T tv				
Greenland	0000	bov				* P				
Hungary	...									
Iceland	0000	bov								
Ireland	+	bov	T				

Italy	...									
Latvia	(1988)	bov				* P T te				
Lithuania	0000	bov				P Qf				
Luxembourg	0000	bov				P				
Malta	-	bov								
Moldavia	-	bov				* T te				
Netherlands	(1994)	bov								
Norway	+()	bov	...	8	...					
Poland	+	bov	T				
Portugal	+	bov	...	1	...	Cn Pa Qf T				
Romania	+()	bov	Pa T te	...			
Russia	+()	bov	12	100	50	* Cn T te				
Serbia and Montenegro	...									
Slovakia	-	bov				*				
Slovenia	0000	bov				* P				
Spain	+	bov	T				
Sweden	+()	bov	V			36500	
Switzerland	0000	bov								
Turkey	...									
U.K./Great Britain	0000	bov				T				
U.K./ Guernsey	0000	bov				Qi *				
U.K./Isle of Man	?	bov					
U.K./Jersey	0000	bov								
U.K./ Northern Ireland	+	bov	T				
Ukraine	-	bov				* Q T te				