



June 11, 2018

Docket ID: APHIS-2016-0050

Agency: Animal and Plant Health Inspection Service (APHIS)

Parent Agency: Department of Agriculture (USDA)

Submitted electronically at www.regulations.gov

RE: Docket No. APHIS-2016-0050, Branding Requirements for Bovines Imported into the United States from Mexico.

The Texas and Southwestern Cattle Raisers Association (TSCRA) appreciates the opportunity to comment on the United States Department of Agriculture, Animal and Plant Health Inspection Service's (USDA, APHIS) proposal to amend the branding requirements for cattle imported into the United States from Mexico.

TSCRA is a 141-year-old trade association and is the largest and oldest livestock organization based in Texas. TSCRA has more than 17,500 beef cattle operations, ranching families and businesses as members. These members represent approximately 55,000 individuals directly involved in ranching and beef production who manage 4 million head of cattle on 76 million acres of range and pasture land primarily in Texas and Oklahoma, and throughout the Southwest.

Imported animals can unknowingly carry foreign animal diseases or disease vectors posing a potential threat to cattle health, live cattle prices, beef supply and trade. To protect the U.S. cattle industry, TSCRA has long supported the permanent identification of imported cattle and the recording of recipients' name, address and phone number to aide in epidemiological disease investigations and locate affected animals.

TSCRA supports the agency's proposed changes to 9 CFR, 93.427. Requiring a single "M" brand for all Mexican cattle and distinguishing between feeder and breeding cattle according to the brand location is more comprehensible than the current requirements. This regulatory change will allow for more discernable markings that are more easily interpreted by health officials, inspectors and cattle producers. The United States imported 1.81 million head of cattle from Mexico in 2017. Uniformity and simplicity in branding requirements are important to facilitate commerce with one of our largest trading partners, prevent cattle from being rejected at southern border ports, and ensure easy identification for animal disease traceability.

TSCRA would again like to thank USDA, APHIS for taking a common-sense approach to simplify and improve the identification requirements for cattle imported into the U.S. from Mexico. If you have any questions regarding these comments, please contact Kaleb McLaurin at 512-469-0171 or at kmclaurin@tscra.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert E. McKnight, Jr.", is written over a light blue horizontal line.

Robert E. McKnight, Jr.
President