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August 13, 2020

Ms. Jennifer Jones
Executive Director
Sunset Advisory Commission
P.O. Box 13066
Austin, Texas 78711

RE: Sunset Review of Texas Animal Health Commission

Dear Ms. Jones:

Texas Farm Bureau (TFB) appreciates the opportunity to comment on issues presented in the Sunset Staff Report for the Texas Animal Health Commission.

Our positions on committee recommendations have been guided by policy developed from our grassroots organization members. TFB supports the continuation of the Texas Animal Health Commission (TAHC) in its role to safeguard the health and marketability of livestock across the state.

TFB submits the following comments on items identified in the staff report.

Issue 1: The TAHC's Laboratory Is No Longer Needed or Cost-Effective, and Should Be Closed.

TFB is opposed to complete closure of TAHC laboratory capabilities and specifically supports keeping the Texas Veterinary Medical Diagnostic Lab (TVMDL) separate from the commission.

TFB is concerned that lab closure could negatively affect the processing time of livestock and poultry industry tests for regulatory programs administered by TAHC. Texas' livestock and poultry industries are too important to be jeopardized by potential lapses in testing and delayed results through consolidation and lost capacity.

TAHC staff have indicated difficulty justifying expense of the lab as it is today so we understand that change may be required. They are investigating a modified lab with fewer resources to improve test cost efficiency.

Knowing this, TFB could see benefit through the agency contracting out some of its lab testing to the extent testing by TVMDL is available, efficient, and cost effective.

Issue 2: The Texas Animal Health Commission's Inconsistent and Weak Enforcement Efforts May Increase the Risk of Animal Diseases in Texas.

TFB supports recommendation 2.5 that directs TAHC and the Texas Department of Agriculture to enter into a memorandum of understanding to ensure TAHC is notified when animals are rejected at state animal export facilities. These livestock are likely to have time limited health inspections in which case the TAHC must be ready to respond and/or monitor until they have been settled to a new destination. TFB policy supports TAHC being notified when animals are rejected at state animal export facilities.

Issue 3: The Texas Animal Health Commission's Outdated Laws, Deficient Rulemaking, and Inadequate Communications Do Not Best Serve Industry or Public Interests.

TFB supports recommendations 3.3 and 3.5 from the staff report.

Item 3.3 requires TAHC to provide clear, consistent public information about state animal health laws and rules, regulatory programs, and appeals processes. Our policy specifically supports the development of agricultural information and education programs that will give the public a clear, realistic and technically accurate perspective of animal rights issues relative to producer responsibilities. This language was developed to assess the increased consumer interest in raising livestock and applies to TAHC mission of sustaining livestock health and marketability.

Item 3.5 directs TAHC and Texas A&M AgriLife Extension Service to enter into a memorandum of understanding to jointly develop and coordinate educational programs and information about animal health. We support the TAHC and the Texas A&M AgriLife Extension Service to continue to work together to educate producers on the rules and regulations of the Trichomoniasis Program. Our policy is more specific to a certain issue in the cattle industry but demonstrates our member's desire to see these two agencies working together toward a common goal.

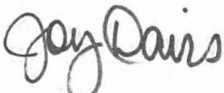
It bears noting that TFB has policy opposing user fee assessments to finance TAHC, but if user fees are required then they should be assessed proportionally for the services provided and not exceed the cost of providing the service. Further, TFB policy supports agencies reviewing existing services to determine which services may be ended or modified for cost savings. We are monitoring any changes that might impact these policies.

Issue 4: Texas Has a Continuing Need for the Texas Animal Health Commission.

We fully support the recommendation to continue the TAHC and we have no position on 4.2. The agency holds a vital role that assures Texas farmers and ranchers have the opportunity to prosper while raising livestock and poultry.

In conclusion, TFB is currently neutral on all other recommendations but we undergo policy development each fall so our members may adopt policy on additional issues at our annual meeting in December.

Sincerely,



Joy Davis
Associate Legislative Director