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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dr. Phillip DeBok
Bureau of Animal Health and Diagnostic Services
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408

Original: 2088

Mizner

cc: Harris
Miller
Sandusky
Legal

March 13, 2000

Dear Dr. DeBok:

As the largest general farm organization in Pennsylvania, Pennsylvania Farm Bureau (Farm Bureau) is concerned with animal health issues affecting the profitability of Pennsylvania farms. One such issue is the control of Brucellosis. On behalf of the more than 27,000 member families of Farm Bureau, I am writing to comment on the proposed amendments to Pennsylvania's Brucellosis vaccination regulations contained in Subchapter H of Title 7 of the Pennsylvania Code, as published in the February 12, 2000 Pennsylvania Bulletin.

Farm Bureau is in favor of the proposed regulations designating Strain RB 51 as the only Brucellosis vaccine authorized for use in cattle in Pennsylvania. After making several inquiries to Pennsylvania's veterinary community, Farm Bureau is of the understanding that Strain RB 51 is as effective as the Strain 19 vaccine that has been used to control the disease for several years. However, unlike Strain 19, Strain RB 51 is not associated with a high incidence of false positives when animals vaccinated for Brucellosis are subsequently tested for the disease. Because Farm Bureau recognizes that false positives are a costly hindrance to the Commonwealth's efforts to control Brucellosis, we support the proposed exclusive authorization of Strain RB 51.

Pennsylvania Farm Bureau appreciates the efforts of the Pennsylvania Department of Agriculture in helping Pennsylvania to achieve and maintain Class Free Brucellosis status, and feels that adoption of this proposed regulation is an important part of those efforts. Furthermore, Farm Bureau appreciates the opportunity to comment on this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Marel A. Raub'.

Marel A. Raub, Esq.
Director of Regulatory Affairs

cc: Sarah Miller, IRRC

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