



May 13, 2015

**U.S. Poultry & Egg
Association**

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Dr. John Clifford
USDA APHIS
1400 Independence Avenue, SE
Room 312-E, Jamie L. Whitten Bldg.
Washington, DC 20250

Dear Dr. Clifford:

In response to your request for comments on the proposed policy for vaccination against highly pathogenic H5N2 avian influenza in the U.S., the U.S. Poultry & Egg Association (USPOULTRY) submits the following for your consideration.

USPOULTRY does not take a position on whether USDA/APHIS should allow vaccination against H5N2 highly pathogenic avian influenza in the U.S. USPOULTRY strongly believes that the best interests of the U.S. poultry industry are served by the complete eradication of the virus from the country. Further, if vaccination is approved it should be used only as a tool to facilitate eradication.

Vaccinating against highly pathogenic avian influenza as a tool for eradication requires that vaccinated flocks be monitored for infection. Since vaccinated flocks can become infected and can shed the virus with minimal clinical signs of disease, these vaccinated-infected flocks can serve as a source of further spread of the virus. It should be assumed that some vaccinated flocks will become infected and this raises a number of questions. These questions should be answered **before** vaccination is approved:

- **How will vaccinated flocks be monitored for avian influenza infection?**
 - What testing methods will be used?
 - Will the testing method detect infected flocks regardless of which vaccine type is used?
 - Who will perform the testing?
 - How often will flocks be tested?
 - Will unvaccinated birds be kept in each flock as sentinels?
- **What happens when a vaccinated flock is found to be infected?**
 - Will the farm be quarantined?
 - Will the farm be depopulated?
 - Will a perimeter of farms surrounding the infected flock be vaccinated?
- **For how long will vaccination be allowed?**
 - What is the plan for stopping vaccination in a multi-age, multi-flock farm?

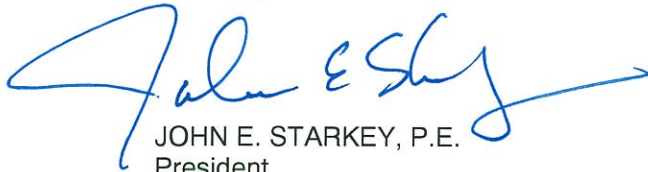
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- **Which farms will be vaccinated?**
 - How will that be decided?
- **How will companies acquire vaccine?**
 - Will this be controlled by USDA/APHIS?
- **How will vaccination affect the pre-slaughter NPIP certification that flocks are HPAI free?**
 - How will this impact FSIS operations?

The future health of U.S. poultry flocks is dependent upon the complete eradication of highly pathogenic H5N2 avian influenza virus from the U.S. The presence of this virus in the U.S. is not compatible with continued good health of the flocks or the economic health of the various segments of the poultry industry. USPOULTRY urges USDA/APHIS to remain focused on the eradication of this virus. Vaccination should only be utilized as a tool after clearly defining the role of vaccination in the eradication program.

Thank you for inviting our comments. We value your leadership during this extraordinary time for the poultry industry.

Sincerely,



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President
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