

Why GAO Did This Study

Foot-and-mouth disease (FMD) is a virus that causes painful lesions, making it difficult for livestock to stand or eat and greatly reducing meat and milk production. No FMD cases have been recorded in the United States since 1929. Federal regulations restrict fresh beef imports from countries where the disease is present because the disease may survive in untreated, uncooked beef (beef), and can be costly to control and eliminate. According to USDA, an outbreak of FMD could cause grave damage to the U.S. beef industry, which had a retail value of \$95 billion in 2014.

GAO reviewed (1) USDA's process for evaluating the animal health systems of countries seeking to export beef products to the United States, and (2) how this process could be improved. GAO analyzed documentation supporting seven countries' requests for FMD animal health system evaluations. GAO also reviewed federal regulations, guidance, and a key trade agreement; and interviewed knowledgeable USDA and industry officials.

What GAO Recommends

GAO is making three recommendations including that USDA clarify its guidance on how staff should document analysis of a foreign country's animal health system and the results of in-country visits to verify information. USDA agreed with GAO's recommendations and described actions it is taking or plans to take to implement them.

View [GAO-17-373](#). For more information, contact Steve D. Morris at (202) 512-3841 or morris@gao.gov.

FOOT-AND-MOUTH DISEASE

USDA's Evaluations of Foreign Animal Health Systems Could Benefit from Better Guidance and Greater Transparency

What GAO Found

The U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service's (APHIS) process for evaluating the animal health systems of countries seeking to export beef to the United States consists of five steps:

- A country requests that APHIS evaluate its animal health system.
- APHIS gathers information about the country's system, including documents identifying (1) veterinary control and oversight programs, (2) vaccination programs, (3) animal identification and movement controls, (4) laboratory diagnostic capabilities, and (5) animal-disease emergency-response measures.
- APHIS conducts in-country visits to verify and supplement this information.
- APHIS does a risk analysis to determine whether the country's beef products pose a risk to U.S. livestock and begins to draft a risk analysis report.
- APHIS determines an estimated risk level, which is included in the risk analysis report with a description of any mitigation measures the country must implement to ensure the safety of its beef exports. A report is completed and made public only for countries whose beef presents low risk. Countries whose beef poses a greater risk will not be eligible to export beef to the United States.

APHIS could strengthen its evaluation of foreign animal health systems by improving transparency to stakeholders, including the public. APHIS guidance instructs staff to adhere to timeframes for carrying out evaluations to ensure a lengthy process is completed efficiently. But the guidance does not instruct staff how to ensure evaluations are fully transparent. For example, APHIS guidance does not

- direct staff to document their analysis of country information and include all problems and concerns identified and how they were resolved;
- direct staff how to effectively document results of in-country visits, although the guidance requires these visits be documented; and
- indicate how to incorporate guidance on transparency from USDA's Chief Information Officer and the Office of Management and Budget into final risk analysis reports.

Without sufficient guidance instructing staff to document such items, it is unclear (1) how APHIS verifies country information and assesses its reliability; (2) how problems identified are ultimately addressed to APHIS's satisfaction; and (3) what methodologies, sources, assumptions, and uncertainties may influence its risk analysis. Further, according to the World Organisation for Animal Health, because risk analysis is inherently subjective, the process must be documented transparently. During GAO's review, APHIS acknowledged the weaknesses in its guidance and formed a team to begin work to address them. By completing this effort, APHIS may be better able to ensure that it has assessed risks fairly and consistently across countries and over time, and that the process is transparent to the public and other stakeholders.