

# PUBLIC SUBMISSION

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Possession, Use, and Transfer of Select Agents and Toxins (42 CFR 73)

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Possession, Use, and Transfer of Select Agents and Toxins (42 CFR 73)

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Comment from (name)

## Submitter Information

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## General Comment

To whom it may concern

The inclusion of Brucella on the select agent list has so hampered investigators with bureaucratic rules and regulations that it has stifled research on this little understood organism which is endemic to North America as well as other parts of the world. The organism is not spread person to person and though found in wild life across the continent does not account for wide spread human disease and is well controlled in agriculturally important livestock with slaughter and vaccination. The loss of researchers and their laboratories has set back progress in understanding this group bacteria. I know of several researchers who have shut down their laboratories rather than risk making mistakes associated with overzealous regulations and their application by ill trained Biosafety personnel and ROs. Including Brucella as select agent was an expensive mistake interns of inhibition of research, loss of culture collections as labs have shut down to avoid over regulation, in adequate inspectors and inadequately trained university compliance personnel.