

Purpose

Permits are the mechanism by which movements are allowed during an FAD outbreak. In a disease outbreak, permits are issued to approve and document movements of specific transports/items into, within, and out of regulatory Control Areas.

Quarantine and movement control (QMC) activities are fundamental to rapidly contain an FAD; continuity of business (COB) activities are essential to mitigating the economic consequences of an FAD outbreak. Both COB and QMC are identified as “critical activities” under USDA Animal and Plant Health Inspection Service (APHIS) Foreign Animal Disease Preparedness and Response Plan (FAD PRoP). Permitted movement intersects both QMC and COB.

For comprehensive information on permitting, please see the, *FAD PRoP Permitted Movement (Manual 6-0)* located here: <http://www.aphis.usda.gov/fadprep>.

Goals

The following are USDA APHIS goals for permitted movement:

- ◆ To facilitate the issuance of permits during an FAD outbreak.
- ◆ To implement science and risk-based permitting guidance on the best evidence available.
- ◆ To provide transparent information to States, stakeholders, and the public on USDA APHIS permitted movement processes.
- ◆ To use the Emergency Management Response System 2.0 (EMRS2), the official USDA APHIS system of record, for issuing permits and tracking movements into, within, and out of a regulatory Control Area during an FAD incident/outbreak.
- ◆ To ensure permit data is entered into EMRS2 in an accurate and timely manner, reflecting best practices and standards.
- ◆ To provide personnel to unified Incident Command and/or State(s) as requested by State(s) to support permitting activities in EMRS2 during an FAD outbreak.

Permits

A permit (can be paper, electronic, or both) is used to approve and document movements into, within, and out of a regulatory Control Area. Permits convey **two critical pieces of information**:

1. approval for a movement (from a specific origin point A to a specific destination point B), and
2. approval for a specific item associated with this movement (animals, products, materials, etc.).

A permit must be approved by the origin State (where the movement begins) and, if an interstate movement, the destination State (where the movement ends).

Only **one permit is typically created** to track all movements of the same item type from a specific origin premises to the specific destination premises for a specific time period (e.g., while the Control Area is in place).

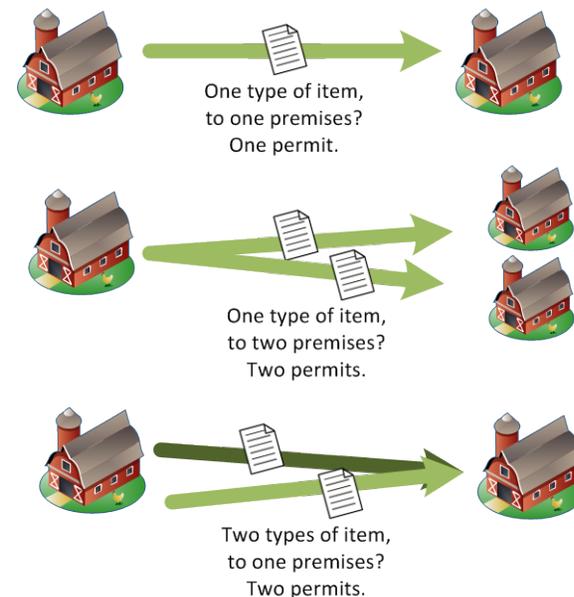
Permits (cont.)

A permit is usually not required for every movement, as long as the two components of a permit **do not** change (the movement origin and destination and the item moved). Additionally, if the requirements of the permit change, a new permit is typically also required.

Figure 1 illustrates when one permit is required and when two permits are required.

Figure 1. Overview of Permits

A PERMIT tracks associated activities between two locations. It specifies what can move, when it can move (frequency), and for how long it can move (start/end date). A permit may also list further conditions required for movement.





Types of Permits

In an FAD outbreak, there are two types of permits: **Specific Permits** and **COB Permits**.

Specific Permits

Specific permits relate to controlling and containing the FAD outbreak, to achieve biocontainment (keeping the disease on Infected Premises) and bioexclusion (keeping the disease out of non-infected premises). They are issued by the unified Incident Command for two overarching reasons: critical movements (to ensure animal welfare, such as feed trucks) and essential movements (related to response activities like depopulation and disposal). These two reasons are not mutually exclusive.

Specific permits and associated requirements should be based on science and risk-based information. The following guidance is provided with an accompanying example:

Negligible Risk Movements: No Specific Permit Required

Movements that are highly unlikely to transmit the disease agent with mitigating procedures (e.g., truck and driver biosecurity).

Example: Movements from an Infected Premises to remove equipment after composting piles have been released may be a negligible risk with appropriate mitigating procedures.

Low Risk Movements (Specific Permit May Be Required)

Movements where there is some risk to transmit disease, but the risk is low and mitigated by biosecurity measures.

Example: Movements of feed or feedstuffs off a Suspect Premises may be low risk with appropriate mitigating procedures.

Moderate or High Risk Movements (Specific Permit is Required)

Movements that have moderate or high risk of transmitting the FAD. Biosecurity and mitigating measures must be implemented to reduce the risk.

Example: Movements of carcasses off an Infected/Contact/Suspect Premises may be a moderate to high risk, even with appropriate mitigating procedures.

Criteria for All Movements from Infected, Suspect, and Contact Premises

Based on risk, the unified Incident Command must identify whether other criteria are required for these critical and essential movements in a response, both those that require a specific permit as well as those that do not (negligible risk). The unified Incident Command is responsible for ensuring all responders are aware and follow these procedures, and that all requirements are met prior to movement.

COB Permits

COB permits help to facilitate continuity of business for non-infected premises which are inside the Control Area. COB permits are for movements from At-Risk Premises or Monitored Premises. Within the COB permit, there are two secondary types of permits; these correspond to two different types of movements:

Operational Permit

- ◆ Used for normal movements that must continue for the non-infected premises to continue operations during an outbreak (e.g., equipment, service crews, and carcasses).
- ◆ Operational permits are not used for animals/products/commodities.
- ◆ Typically, operational permits have a non-negligible level of risk **and** are movements within or out of the Control Area to/from either At-Risk or Monitored Premises.

Secure Food Supply (SFS) Permit

- ◆ Used for movements of animals and animal products into the supply chain for feeding, growing, processing, or to market.
- ◆ At-Risk Premises may be eligible for SFS permits for movement *within* the Control Area; Monitored Premises may be eligible for SFS permits for movement *within* and *out* of the Control Area.

Criteria Required for COB permits

COB permits have defined criteria that must be met for permit approval. These criteria are ideally identified ahead of time for SFS permits, although changes can always be made based on outbreak situations. For both SFS and operational permits, these criteria are based on the level of risk of the movement, and may include:

- ◆ diagnostic testing (very common),
- ◆ epidemiological information,
- ◆ strict biosecurity standards, and
- ◆ other requirements.

States can verify that these criteria or qualifications have been met before they approve the movement (both the origin State and destination State). The unified Incident Command and State/APHIS officials may issue further guidance on what movements require a COB permit, and any associated requirements.



Permits (cont.)

Table 1. Summary of Permit Type

Type of Permit		Type of Premises	Details	Into/Within/Out of Control Area?	Intrastate or Interstate?	Example
Specific Permit		Infected, Contact, Suspect	Includes critical movements (e.g., animal welfare) and essential movements (e.g., response activities). Specific permit may/may not be required based on risk and unified Incident Command recommendation.	Can be into, within, or out of Control Area; into or within Control Area is more common.	Usually intrastate, rarely interstate.	Movement of animals on a Suspect Premises to a slaughter establishment in the Control Area.
COB Permit	Operational Permit	At Risk, Monitored	Includes normal movements necessary to keep non-infected premises within the Control Area in business during an outbreak. Permit requirements/criteria based on unified Incident Command, APHIS National Incident Coordination Group, and State officials recommendation.	Usually within or out of Control Area.	Can be intrastate or interstate.	Movement of mortality off of an At-Risk Premises to outside of the Control Area. ¹
	SFS Permit	At Risk, Monitored	Includes animal and animal product movements into the supply chain for feeding, growing, processing, or to market. Helps to secure the U.S. food supply during an outbreak. Permit requirements/criteria based on SFS Plans and/or the unified Incident Command, APHIS National Incident Coordination Group, and State officials recommendation.	At-Risk Premises can only move within a Control Area; Monitored Premises can move within or out of a Control Area. Movements into the Control Area are less common.	Can be intrastate or interstate.	Movement of washed and sanitized shell eggs from a Monitored Premises to market outside of the Control Area.

¹ At times, some movements—for example, rendering mortality off-site—may be postponed, cancelled, or be required to complete significant mitigations due to known risk of the movement spreading disease from an unknown Infected Premises.

Roles and Responsibilities

State Role in Permitted Movement

Before an Incident

States may choose to use EMRS2, or any other information management system, before an animal health incident.

During an Incident

USDA APHIS prefers States use EMRS2 for permitting during a FAD outbreak; however, if a State feels as if they have an information management system that can handle permit requirements, including notification of destination States, they can continue using their own system in an FAD outbreak. Permit information must be provided to the unified Incident Command for entry into EMRS2.

Additional State Requirements

States may establish additional surveillance and testing criteria for premises located in the Surveillance Zones/Free Areas. Movements outside the scope of the Control Area (not going into, within, or out of a Control Area) during an FAD outbreak are not captured in EMRS2 and should continue using existing State and/or Federal authorities, processes, and procedures.

Additionally, any existing State requirements must be met prior to interstate movements on Interstate Certificate(s) of Veterinary Inspection, in addition to FAD permit requirements.

USDA APHIS Role in Permitted Movement

Before an Incident

USDA APHIS does not permit movements related to FAD incidents until there is an FAD incident.

During an Incident

USDA APHIS, in coordination with State Animal Health Officials and the unified Incident Command, has the authority to oversee interstate permitted movement (commerce) and any movement that relates to international trade. USDA APHIS is prepared to support State(s) in a FAD incident in all permitted movement activities, as requested by the State. In the event of an emergency declaration, USDA APHIS also has authority over intrastate movement.

For timely action and reporting, permit and permitted movement data must be entered into EMRS2 in a timely and accurate manner.

Types of Movements

There are three types of movements: **Permitted Movement**, **Tracked Conveyance**, and **Routine Movement**.

It is a State’s responsibility to ensure producers in their State know what type of movements require a permit, what requires no permit but reporting to the State and/or the unified Incident Command, and what may only require enhanced record keeping by the producer. It is important that the State(s) communicate this information to producers in an accurate and timely manner.



Permitted Movements

After a specific or COB permit (either operational or SFS) has been approved, the items, animals, or products specified in the permit record can be moved from the specified origin to the specified destination. This is a **permitted movement**.

Each permitted movement for a specific permit and COB permit is always recorded in EMRS2 in an FAD outbreak, even if the State elects to issue a permit from their own information management system—this data is subsequently entered into EMRS2 by unified Incident Command or EMRS2 personnel.

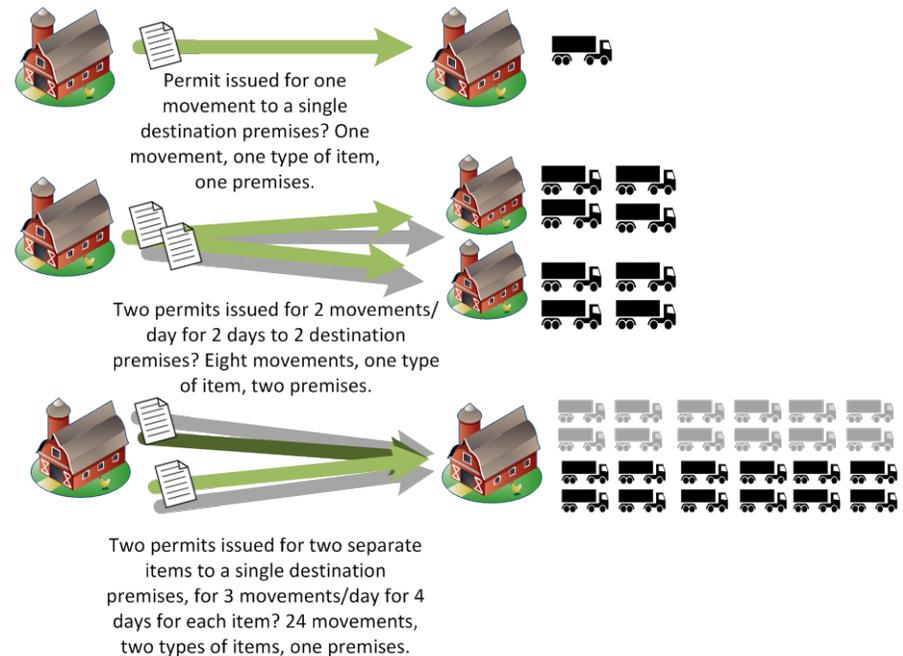
Specific and COB permits may lay out criteria that is required to be met for a permitted movement to occur. This criteria must be met *before* the movement occurs. In general, it is the responsibility of the origin and destination State to validate or check that this criteria has been met as desired.

Each individual permitted movement is entered in EMRS2 when there are multiple movements against the same permit. Because a single permit can be used for multiple permitted movements, it is common for there to be more “permitted movements” than “permits” in EMRS2.

Figure 2 provides an illustration of permitted movements for a COB permit. This is just an example to show the distinction between a permitted movement and a permit.

Figure 2. Overview of Permitted Movements

A MOVEMENT is always associated with a permit. A permitted movement occurs when the items/animals physically go from one premises to another.





Types of Movements (cont.)

Tracked Conveyances

Tracked conveyances are negligible-risk movements that can move into, within, and typically out of a regulatory Control Area without a permit. The origin and destination State(s) do not need to permit these movements with a COB permit. Just because a tracked conveyance does not require a permit does not imply a premises does not need biosecurity: premises moving tracked conveyances must implement and enforce appropriate biosecurity measures.

- ◆ Typically, tracked conveyances are negligible-risk products that are leaving a Food Safety and Inspection Service (FSIS)-inspected plant (e.g., FSIS-inspected pasteurized liquid egg).

Tracked conveyances should be reported to the origin State and/or unified Incident Command as they are usually entered in EMRS2.

- ◆ Tracking enables transparency, allowing the origin and destination States to view these conveyances, even without a permit being issued.

Routine Movements

Routine movements are normal movements from At-Risk and Monitored Premises; they

- ◆ do not pose beyond a negligible risk;
- ◆ do not require an operational permit; and
- ◆ must not be of animals or animal products—these require an SFS permit.

Routine movements are not entered in EMRS2. Routine movements are for items/movements that are “proclaimed” to be acceptable by State(s) and the unified Incident Command to move without a permit during an outbreak, which may vary by outbreak as well as within an outbreak.

Routine movements do not require a COB permit of either type and are more commonly intrastate. If the movement is interstate, the unified Incident Command, origin/destination State, and APHIS officials determine whether or not it is a routine movement or requires an operational permit (under COB permit).

Table 2. Summary of Definitions for Movement

Term	Explanation	Example	Requirements	Approval
Permitted Movement	A permitted movement is the type of movement associated with a permit (specific or COB). One or more permitted movements can be associated with a single permit, but each movement is recorded separately. If a permit is issued for multiple movements, these movements must be for the same item and between the same two premises, in the same direction.	Three separate truckloads of washed and sanitized eggs moving between the same two premises in the Control Area are associated as permitted movements to a single permit.	Tracked in EMRS2. The specific requirements associated with the permit must be met for the permitted movements that are associated with that permit.	State of origin and State of destination must approve permit which allows the associated permitted movements.
Tracked Conveyances	A type of movement that does not require a permit. Tracked conveyances originate from FSIS-inspected establishments and are negligible-risk products.	Pasteurized liquid egg loads moving out of a Control Area from an FSIS-inspected processing facility in a Control Area.	Typically tracked in EMRS2. FSIS-inspection.	Notification to State of destination but no approval required.
Routine Movement	Routine movements are a type of movement that does not require a permit. All movements must be negligible-risk and not require a COB permit (either SFS or operational, so no animals or animal products). Often intrastate, but can be interstate movements with agreement of State origin and State of destination.	Movement of washed and sanitized egg-crates from At-Risk and Monitored Premises; personal or business movements off of and on to a premises (e.g., to the post office).	Not tracked in EMRS2. Elevated biosecurity, enhanced record keeping and other requirements as dictated by the State of origin/unified Incident Command.	State of origin (and State of destination for interstate movement) and unified Incident Command provide general proclamation of what categories or items are routine and can move without a permit; this can change during the outbreak.