

Animal Disease Traceability (ADT) Overview May 2014

Background

Preventing and controlling animal disease is the cornerstone of protecting American animal agriculture. While ranchers and farmers work hard to protect their animals and their livelihoods, there is never a guarantee that their animals will be spared from disease. To support their efforts, the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) has promulgated regulations to prevent, control, and eradicate disease. Traceability does not prevent disease, but knowing where diseased and at-risk animals are, where they have been, and when, is indispensable in emergency response and in maintaining disease control and eradication programs.

We have clear indications that higher levels of official identification enhance tracing capability. For example, through the National Scrapie Eradication Program, 92 percent of cull breeding sheep are officially identified at slaughter, primarily using flock identification eartags. In fiscal year 2010, this level of official identification made it possible to achieve traceback from slaughter of scrapie-positive sheep to the flock of origin or birth as part of the scrapie surveillance program 96 percent of the time, typically in a matter of minutes. Other diseases, particularly contagious ones, require that we trace to more than the birth premises. We must search premises where the animal has been after leaving the birth premises but before going to slaughter. This means the scrapie model is not a complete solution for such diseases.

APHIS believes we must improve our tracing capabilities to not only address current concerns, including the increasing number of cases of bovine tuberculosis, but also to respond to new or foreign animal diseases in the future.

On August 11, 2011, APHIS published in the Federal Register (76 FR 50082– 50110, Docket No. APHIS–2009–0091) a proposal to amend its regulations. The proposal set minimum national official identification and documentation requirements for the traceability of livestock moving interstate. The final rule was published on January 9, 2013. The regulations set forth in the rule (now at title 9, *Code of Federal Regulations* (9 CFR) part 86) establish a system that promotes APHIS' ability to trace animals back from slaughter and forward from premises where animals are officially identified. The regulations also help in tracing animals' interstate movements.

The new regulations establish USDA's Animal Disease Traceability (ADT) program and supplement existing regulations in 9 CFR subchapter C containing requirements for the interstate movement of livestock to prevent the dissemination of diseases of livestock within the United States. While APHIS focuses on interstate movements of livestock, States and Tribal Nations remain responsible for the traceability of livestock within their jurisdictions.

Animal Disease Traceability Framework

USDA's ADT program is a coordinated approach to the mandatory identification of animals moving interstate. This approach embraces the strengths and expertise of States, Tribes, and producers and empowers them to find and use the most effective traceability approaches to identify animals moving interstate nationally. Moreover, this approach builds on the successful use of identification methods in APHIS' disease eradication programs; these have significantly boosted traceability. Our refocused approach builds on the fundamental identification requirements of those programs by reestablishing the use of basic, cost-effective identification methods widely accepted by producers. Specifically, APHIS has established traceability regulations for the interstate movement of farm-raised livestock and poultry. Cattle are the priority because of the void in traceability in that sector.

Fundamentals of Animal Disease Traceability Regulation

The regulations at 9 CFR part 86 establish minimum national official identification and documentation requirements for the traceability of livestock moving interstate. The species covered in the rule include cattle and bison, sheep and goats, swine, horses and other equines, captive cervids (e.g., deer and elk), and poultry. The covered animals moved interstate, unless otherwise exempt, would have to be officially identified and accompanied by an interstate certificate of veterinary inspection (ICVI) or other movement document. The requirements do not apply to livestock moving:

- Entirely within Tribal land that straddles a State line and the Tribe has a separate traceability system from the States in which its lands are located; or
- To a custom slaughter facility in accordance with Federal and State regulations for preparation of meat.

Other exemptions are applied on a species-specific basis.

Official Identification and Interstate Movement Documentation

Livestock moved interstate, unless otherwise exempt, must be officially identified and have an ICVI or other documentation.

• Official Identification

Official identification methods are defined by species in the tracebility regulation. Official eartags serve as a common method of official identification for serveral species, including cattle. Additional materials explaining official identification methods by species are available on the ADT Web site.



• Interstate Certificates of Veterinary Inspection

ADT relies on interstate movement documents to provide information on the ship-from and shipto locations. While ICVIs are not actual reports of animal movements, the information contained on the certificates highly correlates to the resulting movements for the listed animals and is used in ADT to indicate likely interstate movements. Using ICVIs this way provides animal movement information that

producers would otherwise need to report.

While use of the ICVI is one of the traceability regulation requirements for livestock moved interstate, certain interstate movements are exempt from the ICVI requirement. Also, shipping and receiving States and Tribes may agree on other movement documents. The ICVI requirements are covered in APHIS' ADT reference material by species.



Accredited veterinarians have ultimate responsibility for the proper completion and administration of ICVIs. The requirements regarding the information that must be contained on the ICVI and the administration of the certificates are covered in 9 CFR part 86.

Comparison of Traceability Systems

• Full Traceability

A full traceability system through the preharvest sector traces an animal throughout its life from birth to harvest, through all locations. Many countries with a national identification system have full traceability systems. This includes Canada, Australia, and many European countries. Our former proposed animal traceability system – the National Animal Identification System, or NAIS – included the concepts of full traceability. APHIS tried to implement it as a voluntary program, but received little support. We also learned that the U.S. livestock industry was not ready for a system as elaborate as the one proposed under NAIS, mostly due to the system's cost and overall burden.

Full Traceability (Preharvest)



• U.S. Traceability without ADT

As we know, APHIS' tracing capability before ADT was inadequate. Without official identification, as was often the case, we used the animal's backtag to trace back from the slaughter plant or last premises where an infected animal resided. Often the traceback led to a market, where the backtag was referenced to the consignor of the animal. The backtag has provided valuable traceability information and will continue to be a vital identification method in ADT. State and Federal epidemiologists continue to work back through farm records to reach the animal's birth premises. As indicated previously, tracing back to the birth premises without ADT can be very time-consuming as frequently there is no official ID. Traces often take 6 months or more. APHIS hopes that will change with the implementation of ADT.

U.S. Traceability without ADT



• ADT – Bookend-plus System

Over time, the number of animals officially identified will increase significantly as a result of ADT. This is of particular interest and significant merit in the cattle sector. Under ADT APHIS will continue to initiate a traceback from the slaughter plant or the animal's current premises. But we will also have the ability to trace forward from the premises at which the animal was officially identified. This is a significant improvement! If ADT is implemented properly, we will often be able to determine this premises within minutes and then start tracing the animal forward from that point. Tracing the animal back from slaughter and forward from the premises of official ID – in a "bookend"-style system – will cut the amount of time required to trace the animal. A true bookend system would only have the start and end points, but APHIS supplements this traceability with information on the animal's interstate movements. Hence, we reference our approach as a "bookend-plus" system.

This very basic solution advances the anticipated level of traceability. Also, being able to consistently determine where an animal's location was officially identified has a great return on investment. But this infrastructure has limitations that must be kept in mind. Our trading partners realize our system does not provide full traceability and that a significant sector of the cattle population is exempt from the traceability rule requirements. When APHIS discusses traceability with its trading partners, it will continue to promote the system as adequate based on disease risk. We acknowledge that our trading partners view our system as inferior to those of other countries; industry stakeholders should also realize this. However, we can minimize the concern of our trading partners by successfully implementing ADT. Most importantly, industry will be more inclined to support more comprehensive traceability options if the "bookend" aspect of ADT is launched successfully.



ADT- Bookend-plus System

Monitoring and Compliance

On March 4, 2014, APHIS Administrator Kevin Shea issued a stakeholder announcing the next phase of implementing ADT. While he empathized that APHIS will continue to inform

stakeholders of the regulatory requirements of the new regulation, penalties will be considered when an individual repeatedly violates the traceability regulation. Keys to advancing traceability include the proper use of official identification and ICVIs and the collection of ID at slaughter; these areas will receive enforcement priority.

More specific information on the monitoring and enforcement aspects is on the traceability Web site.

Animal Disease Traceability Reference Materials

APHIS provides various reference materials on the traceability regulation and its requirements at <u>http://www.aphis.usda.gov/traceability/</u>. Please check this Web site for the most current information.

Questions:

Are there specific areas of the ADT (overall framework and regulations) that industry finds problematic that USDA could work to improve?

Are there aspects of traceability that USDA should consider in the future for certain species?

What aspects of our traceability system need to be evaluated to ensure U.S. meet the future demands of trading partners?