ANIMAL DISEASE TRACEABILITY
PUBLIC INDUSTRY FORUM
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PRESENTERS:

Ms. Deborah Millis
Dr. T.J. Myers
Dr. Dave Morris
Dr. Keith Roehr
Mr. Neil Hammerschmidt

P R O C E E D I N G S

MS. MILLIS: I want to welcome you today. My name is Deborah Milles, and I'll be the moderator of this meeting.

I see some familiar faces. So you have been at some of the other meetings where you have seen me moderating. So you know that sometimes, if I can't bring a crowd together, I will do a little stand-up or sing a little musical number, and no one wants to hear that. So usually the groups are quite cooperative.

I appreciate you all coming out today, and I want to remind you that out the doors to the back here and off to my left is where the restrooms are. And then straight behind us is where the nearest fire exit is. And I'm hoping that you'll feel free to use the first and that we won't have to use the second.

So let me just go through our agenda today and let you know what we are going to be doing. First up, we are going to hear some opening remarks from Dr. T.J. Myers from Veterinary Services within APHIS.

And he will be introducing Dr. David Morris who will talk about the importance of traceability. And that will be followed by a presentation from Keith Roehr from Colorado on the work of the traceability working group.

When all of those are completed and after a brief break, we are going to come back in this room and gather around these round tables and have some discussions about the performance elements that are being proposed as part of the new regulation.

And in those discussions we will break up based on species. We will have cattle in one group and sheep and goats maybe in another, equine, poultry, swine perhaps, and you are welcome to gather around any of those species areas.

If you, as participants, want to move from one group to another, that's fine, too. There will be an APHIS person at each of those tables to gather that input from you. Because the input that you have as industry leaders and stakeholders is invaluable to the development of this regulation.

So without any further ado, let me introduce Dr. T.J. Myers.

DR. MYERS: Thank you, Deb. And welcome, everyone. My name is Dr. T.J. Myers. I am associate deputy administrator with Veterinary Services.

And on behalf of our administrator, Cindy Smith, and our deputy, Dr. John Clifford, I want to extend their welcome to you as well. This is an important meeting today, and we are glad that all of you

took time from your very busy schedules to set aside a day to come and talk with us about a very important issue.

I hope what you will see today is that the theme for the day is collaboration. We really do need your input as we move forward with traceability.

We held a number of public meetings last summer to address some of the concerns that had been expressed about the former approach, the NAIS or the National Animal Identification System, and we heard those concerns and we heard those issues loud and clear.

And the Secretary of Agriculture, Tom Vilsack, has worked with us, and we have taken into account all of that good input and those concerns that we heard last summer.

And on February 5, the Secretary announced a new framework and a new direction for traceability. And since that announcement on February 5, we have been working very hard to try and define a way forward for putting that new framework into action.

And that's what we are about today, to talk about that new framework and to get your input on how we move forward in developing a regulation that will help advance animal disease traceability.

We have a working group that we have

established. It's a federal/state/tribal working group that is advising us on performance standards for the new regulation, and that's going to be the centerpiece of what we talk about today.

As Deb mentioned, there's actually three presentations today. First, Dr. David Morris is filling in for Dr. Rich Breitmeyer, the state veterinarian of California, who's put together a wonderful presentation that talks about the utility and the need for traceability in the real world and how traceability provides that support to animal disease response.

For the second presentation, I'll be back up here to talk about the new framework that the Secretary has established and that we are moving forward with. So I will give you some specifics about that new framework from the developmental work we have been doing.

And then the third presentation is Dr. Keith Roehr, the state veterinarian of Colorado, who sits on the working group, and he is going to talk about the work group's activities and the performance standards that they have been developing that will form the underpinning of the new regulation.

So that's, again, what we are all about today. So without further ado, I will ask Dr. Morris to come up and give our first presentation.

DR. MORRIS: Thanks, T.J. If we could, perhaps, we will get the lights so perhaps the glare won't be quite so much. That looks better.

Okay. Yes. As T.J. referenced, Dr. Richard Breitmeyer, state veterinarian of California, and his colleagues, Mr. Victor Velez and Dr. Edmondson from the California Department of Food and Agriculture, developed this slide set.

It does substantiate many of the current animal disease concerns that the State of California has had to deal with. And in so doing, it illustrates many of the reasons and ideas and concepts as to how we can advance collectively with producers, state and federal animal health officials, and tribal animal health officials animal disease traceability.

In this overview Dr. Breitmeyer does discuss the animal health and disease concerns that he has had to deal with from an administrative standpoint.

As he worked his way through assessing the strengths and weaknesses of their current animal disease traceability system, he identified some animal movements of interest.

Similarly, he looked at the current animal disease traceability tools at their disposal and how he engages with other state and tribal animal health

officials.

It does identify some traceability gaps that we will discuss here later on, as well as some recommendations from his perspective as how to best advance animal disease traceability.

The animal health concerns, certainly we do have enough established animal disease issues addressing us at a national level, the state and federal cooperative animal health programs, such as bovine tuberculosis.

Similarly, there are several state animal disease issues that are of concern such as trichomonosis. Certainly, as I last knew, there were 18 states that have engaged in state-specific animal disease programs in attempts to control and/or possibly eradicate those various diseases.

The list that has been compiled that he shared at the meeting were associated again with bovine tuberculosis, but also we still have not totally eradicated bovine tuberculosis.

Certainly we all remember the Christmas cow of 2003 with bovine spongiform encephalopathy. I did mention the bovine trichomonosis issue.

And as we all know, the occurrences in 2001 and a subsequent occurrence in the U.K. relative to

foreign animal disease, particularly here foot-and-mouth disease. We do recognize the presence of the disease in Korea, as well as Japan.

Then we always have the issues of emerging diseases yet to be discovered and reemergence of diseases that we felt were fairly quiescent.

But I think the key important point that Dr. Breitmeyer makes here is that tuberculosis, in and of itself, cannot be eradicated without adequate animal disease tracing capability.

If we looked at reviewing some of the data from the bovine tuberculosis nationally, we recognized that, in the last 12 years, we have identified it in 92 distinct herds, both dairy and beef.

If we look at Michigan and Minnesota, there were 61 herds that were affected. If we looked at the rest of the United States, we recognized here 31 different states -- or excuse me -- 31 different herds have been identified through both the harvest surveillance programs as well as additional live testing.

I think what's important here on this particular point that Dr. Breitmeyer is making is that seven of those herds -- or seven of those positive cases were not associated with a specific herd.

And so, in regard to animal disease traceability, the seven adult slaughter cases from California, Texas, Nebraska, New Mexico and South Dakota were unaffiliated, so to speak, with a particular herd and indeed compromised the ability to effectively respond to traceability needs.

If we look at the slaughter case submissions in the nine-year period from '01 to '09, we see that there are 364 cases of bovine tuberculosis in those last nine years.

Certainly, as the histogram indicates, the decrease has been occurring, but the important thing is, to be able to respond to those cases identified at harvest time, ID must be present and collected at slaughter.

If we looked at the bovine tuberculosis zone status for the past 20 months, we recognized that there are 16 new herds, and this does encompass both cattle as well as cervid. And in that regard, we've had 16 newly detected tuberculosis cases in those last 20 months.

It is a bit interesting, although it's part of the epidemiological investigation, the strain serotyping. And in that regard, the strain typing have indicated definite differences, although it's not indicated on this particular slide, and we do see

aspects here with the cervid is the alternative livestock-type facilities.

I think what's important here relative to the issue and the ongoing traceability effort for bovine tuberculosis coming out of Texas, we recognize that in this one herd alone, that it involved 22 different states.

And the exposed heifers that had been moved out, there were approximately 38 percent or a bit more than a third of those heifers were identified by virtue of the data associated with the producer records.

What's interesting here is to note that more than 3200 of those heifers had to be identified by efforts associated with field investigation.

So we have data that's available from producer records. We have data from other sources of records, but we also have the time spent to be in the field to follow up with where these animals have gone, and we recognize that this one investigation alone took us into 75 different herds and over 130,000 head of cattle tested to date.

So in terms of size and scope and magnitude of an animal disease investigation -- in this case, bovine tuberculosis -- it can be quite extensive.

Dr. Breitmeyer, unfortunately, had to deal

with a case of bovine tuberculosis in California in 2002. This slide looks a bit busy, but I think I can summarize its points here quite quickly.

And that is that, in this one positive case, he examined a number of animals that came into that herd and found in excess of 285 -- I did attempt to count every little square on this particular slide and it got a little bit confusing -- but suffice it to say that there were 285 herds from which animals came that went into this one positive herd associated with bovine tuberculosis.

So if you are going to assess the number of animals that come into the herd, you are going to assess the number of animals or herds to which these animals from that herd had gone to.

And this, similarly, is more than 270 herds in which animals were dispersed in the process of doing the investigation for that particular disease.

I think this slide, however, does summarize it a bit more succinctly, and that is looking at three different herds in the California data in 2002 in which he had to deal with the bovine tuberculosis.

In one herd alone, over 33 states were represented from which animals were found with the official ID and the state code associated with the

animals in that particular herd. In another herd there were 22 states represented.

So certainly the number of animals that are moving across state lines in this country for the dairy operations which these herds represented were significant.

I think it's also important, though, to look at the small herd -- that is herd No. 3 here -- in which five states were detected.

I did add up the number of animals within that herd, and it's only about a herd size of 40 head. A bit larger than the average beef herd in the United States, but still significant to recognize that even in small herds we have state source animals that do come into it.

More recently in 2009, just this last year, again, another disease example in which he illustrates in this dairy 52 sources of animals came into this one particular dairy.

Similarly, in where these animals exited or were traced out to, this involved more than 105 different herds in terms of the time spent, the money supporting the time spent, as well as the supplies, and the time spent in field investigations can be quite extensive.

He summarizes these four affected herds and recognizes that, again, the strain differentiation that does occur in many of these bovine tuberculosis herds.

But, in that sense, to have more than 659 traces of over 21,000 head of cattle, they ended up testing, in the 2009 California bovine tuberculosis event, more than 254 herds and almost a half a million head of cattle to date.

So, again, illustrating the significance, the size, the scope, and the magnitude associated with that particular disease investigation.

Tuberculosis testing and RFID, radio frequency identification. I think I would like to refer to it as automated data capture systems.

And so as California has proceeded with the issues of speed of commerce, they have recognized some advantages in their animal disease investigation work with automated data capture systems.

So regardless of the frequency associated with the RFID technology, the automated data capture systems and the speed of commerce was well-received by the producers in the implementation of their disease investigation efforts.

It clearly provided enhanced accuracy and decreased testing time during retest. Many of you are

familiar with the size of the milking strains in California for many of those herds. And the frequency on a day's basis is what they do have to go through the milking parlor.

But the concept here is that speed of commerce and the ability to document and affix the numbers in which these cases were 15-digit numbers onto an official animal health program or official animal health paperwork was indeed enhanced and made far more efficient.

Moreover, the reconciliation, as many of you are familiar with bovine tuberculosis testing, you recognize that you inject this animal with the bovine tuberculin in a subdermal fashion.

In the same time, 72 hours later, one's asked to make sure that same animal that was recorded on the paperwork initially is the same animal that was tested 72 hours later. So the accuracy of the testing has been enhanced relative to some of the automated data capture systems.

Similar to some of the data reports that we have received in the past from the State of Minnesota, reinforced Dr. Breitmeyer's observations here that not only accuracy and labor and speed, but also the issue of safety.

In one of the reports from the State of Minnesota, that was the primary criteria by which the success of the effort in some of the automated data capture and comments relative to the investigations that were made in Minnesota did reference.

So it's, again, not only accuracy and speed, but also safety in the automated data capture systems that potentially can be used.

So as we move to the animal movement concepts of interest -- and we clearly have animal movement experts here in our audience today -- Dr. Breitmeyer summarized -- and his staff -- many of the movements that go into California, and this is on an individual state basis. It's certainly a large state.

But if we look at the international movements into the state of California, more than 55,000 animals were imported into California alone. And that, as Dr. Breitmeyer references, are the known imports into the state of California.

Cattle graze with or near domestic cattle in central and southern California. The situation of commingling is important to his observations and the administrative efforts in California and the change of ownership before moving to a feedlot or slaughter.

In Canada they have less than 600 -- excuse

me -- cattle coming into California from Canada, they have less than 600 dairy. And as far as the beef imports, primarily direct to slaughter. So it's primarily, in California, anyway, a southern importation issue.

In summarizing some of the data that the staff reviewed, there were almost 40,000 shipments of animals from the border -- from border reports, involving over 17 million head of cattle.

They have both permits associated with, as far as a permitting system, and this involved less than 400,000 head of cattle in 2009 -- or I should say, livestock -- and this was associated with a permitting system in excess of 4000 permits.

So clearly a substantial paperwork effort and administrative effort in his office to monitor and keep track of potential areas of risk in assessing animal movement activity.

In terms of more specifics, these 40,000 shipments represented over 850,000 head of cattle, a substantial number of swine, primarily probably for slaughter in the state of California.

Nevertheless, over 50,000 head of horses, which I thought was unique here relative to the number of animal movements that are occurring in the state of

California. Again, attempting to assess risk for animal disease, animal health purposes.

This summarizes the entry permits. And outside of the actual specifics, I think it's important here that California alone receives livestock from 45 different states and have documented here two foreign countries in 2009 alone.

If indeed California is the 46th state, that means only four states didn't send animals to California in the year of 2009.

So if we look at some of the traceability tools that Dr. Breitmeyer has at his disposal -- and many of us are familiar with the bang tag or the orange metal ear tag or the brucellosis vaccination tag -- California does require all heifers to be vaccinated, including those imported from other states.

And as we look at some of our data, we recognize that the ID is at slaughter for intrastate movement apparently in the state of California.

The brite tag is the nonorange tag. It's similar in design as from a technology standpoint as the orange metal tag.

We recognize that they both convey the National Uniform Ear Tagging System -- that's the NUES -- it is a nine-digit alphanumeric numbering

system, and there are specific in the middle three -- or I should say, the third, fourth, and fifth digits are strictly letters.

In that regard they are restricted for brucellosis, and the ones that are not restricted to the brucellosis program are available to practitioners through the USDA silver brite tag program.

What's important for you to remember is that these tagging systems, the metal ear tag technology, is controlled from a distribution standpoint.

The USDA does approve the use of these numbers and the allocation to the states, and the states do keep track of the distribution to the accredited veterinarians who apply these devices at present in the United States.

I think the key thing here -- the comments -- that they are cheap, they are easy to place, but they may be expensive or difficult to read and record. But it is certainly something that's been common to the established brucellosis and tuberculosis programs.

In terms of the traceability tools, we recognize that all animals that are imported in this country must have the official ID from the country of origin. In this case, he's referencing Canada and

Mexico.

But the important thing here is that official ID is unlawful to remove. And there are traceability tools available for official ID, but if the traceability tools are removed, then our animal disease traceability is indeed compromised.

He does reference the branding, and we identify that the brand is an ownership-based system. It is ownership unique. It may not be individual animal unique.

He lists 14 brand inspection systems. I'll have to confer with my friend Rick Whaler to see if indeed that should be 15, but nevertheless they are restricted to 14 or 15 brand inspection system states.

We do recognize that some states such as Texas are county-based, and with 254 counties in the state of Texas, there is potential for duplication of brands. But within a state, they do have complementary traceability advantages.

If we look at the traceability tools and the records from our state and federal cooperative animal health programs, in the state of California, which this slide set references, there are over 800,000 heifers that are vaccinated per year, predominantly in the dairy industry in the state of California.

If we look at some of the national data, we recognize that less than 25 percent of the eligible heifers, both dairy and beef, are vaccinated in this country.

It's also interesting to note that, in a recent animal disease surveillance effort from the period of time of '06 through '07 with almost 22,000 head of animals examined, we recognized that only 13.6 percent of the adult cows at harvest time retain the metal ear tag associated with the brucellosis vaccination program.

So clearly brucellosis vaccination, when used and accompanied by the official metal ear tag, is useful. The end result, in terms of national efforts and frequency of use and retention, does present some challenges relative to that as a traceability tool.

Interstate certificates of veterinary inspection, oftentimes referred to as health certificates, are significant documents to convey movement between states.

In the state of California, there were over 18,000 of these documents presented to them, most in paper format. You are certainly aware of automated data capture systems, electronic health certificates, but in the state of California, less than 2 percent of the

certificates are provided in that format.

And it does, from a traceability tool, have great potential, but if it's not within a searchable database, it becomes time-consuming and labor-intensive to go through those. As far as interstate -- international health certificates, they are essentially on a case-by-case basis.

Additional traceability tools are the records associated with brand inspection systems. Clearly document many intrastate movements and some interstate. Clearly an advantage of brand inspection systems is the fact that they have defined reportable animal movement activity within that particular state. And that is an advantage to many animal health officials in those states.

However, they often are in paper format although there are some states, such as New Mexico, that have engaged in an electronic system, and perhaps there are others.

Because brand reports, because health certificates are not always reported promptly to state offices, both state of destination as well as state of origination, many states have engaged in a permitting activity or a process in which a telephone call prior to movement is made. The permit number then is associated

with the actual shipment, the date, and that date is then made available in those state offices.

And permitting systems appear to be gaining in increasing effectiveness relative to monitoring those interstate animal movement activities.

If we look at 2008, USDA National Ag Statistics Service data, we recognize that 19.5 million head of cattle crossed state lines in the year 2008. With an estimated inventory of approximately 30 million, you can see that it's substantial.

These are animals that do not -- that are moved for feeding and breeding purposes. It does not include movements for slaughter or harvest purposes. So a significant number of animals do move interstate each year.

And as far as traceability tools and records, I did have the privilege of visiting more than one livestock market here in the last few years, and indeed many of the accounting systems and documentation within many of our sale yards and livestock auction markets do provide excellent traceability tools as far as recordkeeping.

As Dr. Breitmeyer moves to discussing the traceability gaps, certainly the brucellosis program, which has been in place since 1934, has made substantial

strides and progress. We also recognize that progress means fewer animals are vaccinated because the emphasis is towards surveillance rather than implementation of pure vaccination efforts.

I documented some of the numbers associated with the brucellosis program and first point testing.

In addition to that -- with surveillance being discontinued and alternatives to optimal surveillance based upon incidence and prevalence data -- the brucellosis program is -- again, conveyed with the illustration -- only 13.6 percent of our adult cows are identified through that animal disease program at harvest.

Many of the states require -- do not require brucellosis vaccination and, in essence then, the less number of animals with official ID.

Movement records do not exist for some animals. There are certain classes of animals, depending upon various state regulations, that may or may not have official ID.

And as we look at ways to advance animal identification and we look at the either removal, unlawful removal, of official ID or other traceability gaps, indeed they do exist. We certainly recognize we are never going to have a perfect system, but something

is better than nothing.

We also have seen in many situations the animal with three or four metal ear tags. Clearly the reason for that is that, when one encounter, either for official purposes or other purposes -- management included -- the use of official ID and if those official ID are multiple but not linked, then our traceability gaps do surface.

And as we look at the practice in which animals are used serially with tags in increasing numbers and applied, then it's easier to provide the associated paperwork.

But, again, that is, at a point in time at that location, it does provide information, but it's optimal if it can be associated with the previous other official ear tags.

Many dealers and traders do not maintain adequate records. From my 20 years of experience in the academic realm looking at beef cattle production management, I think we can also say that many producers do not maintain adequate records.

And clearly they are beneficial. And paperwork is not the funnest thing any of us have all ever done, but nevertheless the time when we need it, it's clearly important.

We have already referenced the issue of automated data capture systems. The ability to search those electronically, not perhaps being in a database, is an opportunity here to fill the traceability gap.

And we have referenced the excellent records that sometimes or oftentimes exist in our livestock markets, but, again, they are paper intensive, and it does sometimes delay our ability to access the information that's pertinent to the disease investigation -- and sometimes delay it.

Traceability gaps here. With exhibitions, I guess that's both pro and con. Clearly there are many county livestock exhibitions in which the information and paperwork is quite complete.

There are others in which it's not always complete, but clearly it's an opportunity here, as they say, a teachable moment.

So in California alone, over 14,000 youth in the next generation of livestock and animal owners exist. The opportunity to identify animal disease traceability and animal identification as it relates is important.

Perhaps more of a risk are the jackpots and the weekends shows that we all know do exist, and the recordkeeping associated with those is probably lax.

The issue of standardization is clearly recognized by Dr. Breitmeyer, and we know there are multiple official IDs out there and location identifiers.

And the facility and the frequency by which animals move interstate makes the issue of standardization across and among states and tribes an important component here as we address advancing animal disease traceability.

I think this next comment that Dr. Breitmeyer makes is important to illustrate that, if indeed we identify animal disease traceability information -- and that is, the ability to associate a location with a unique ID at a point in time -- is essential and applicable for all disease situations.

Diseases do vary. There is no such thing as an average disease.

So when we look at his point here with long incubating diseases such as bovine spongiform encephalopathy, the issue then becomes one in which the disease is transferred early on in life and seldom detected until the animal has reached a termination point, whether that be harvest or rendering.

So in that situation, the type of information that we glean from being able to associate a

point in time with a location with a unique ID is important as to how they conduct the disease investigation.

Changing gears, if we look at bovine tuberculosis and we look at the closeout data, we recognize that many of the recent investigations have taken as much as six months or longer. And in that regard, what we are needing up front is the animal disease traceability information. That is location, ID, and point in time.

What happens after that information is acquired, whether it's stored in a database or whether or not our investigators in state and tribal investigators go to the field to acquire that information, then is the process by which they implement the disease investigation.

My point being is that the data we take and then, when they start with the disease investigation itself in this case, it's going to take at least 72 hours to perform the test. That's part of the disease investigation.

Our issue is, how do we find the appropriate information that, again, associates the location with the unique ID at a point in time.

So if we have the animal disease

traceability information, as the summary of data from 2002 illustrates in the state of California -- and that data is very helpful in reducing the size and the scope on occasion -- it's projected that the 688 herds in the state of California that were involved in the disease investigation of 2002 could have been reduced to less than 130 herds.

The cost to the California Department of Food and Agriculture was in excess of half a million dollars, and USDA costs were in excess of $375,000.

So the importance of the animal disease traceability information was important and instrumental, if indeed it was possessed, prior to having to go to the field to conduct all the -- if it was more complete, then they would not have had to conduct such an extensive investigation.

We referenced the issue associated with bovine spongiform encephalopathy. We also know that sheep scrapie has been a very successful program in this country.

We recognize that, based upon animal inventories, the sheep industry is about 1/10 the size of the cattle industry on animal numbers alone, but nevertheless it is, again, based upon a transmissible spongiform encephalopathy.

For those that have been intimately familiar with the sheep scrapie program, you know that it's what we refer to as a bookend system.

We identify with the premises ID number the location where the animals were born, and that's clearly important in the epidemiology of this disease, primarily because that's where the disease is transferred.

Similarly, the guidelines are focused on identifying these animals at slaughter, at harvest time.

And by being able to initiate an investigation by having not only where the animals were identified at slaughter, but that prem ID takes them right back to the birth premises, and clearly it facilitates the opportunity to not only do a trace back, but also a trace forward situation.

So for this particular disease example, the sheep scrapie program has been very effective, recognizing that since 2000 -- when, in essence, it was initiated -- to now, the estimate last given to me was in excess of 80 percent of the sheep scrapie has been eliminated from the U.S.

Other issues that state animal health officials have to deal with in terms of animal disease traceability and animal traceability are associated with food safety and drug residue issues identification -- or

the lack of identification is a problem.

We recognize that even many of the facilities are contacting many of our livestock markets and putting pressure that, if animals are not identified and traceable, then the opportunity to move in some of those harvest facilities is gradually decreasing.

So the USDA and FDA are reaching out to states for help. We all recognize that, on July 7 of 2009, Vice President Biden and Secretaries Vilsack and Sebelius did make a joint announcement relative to advancing a national animal disease response and trace-back network.

So it's clearly important for issues other than purely animal disease, and, hopefully, some commonalities can be identified.

Dr. Breitmeyer's recommendations align a lot with the program that you have here this morning. It is to identify and prioritize those animal disease traceability needs for existing disease programs, to identify current traceability tools that are effective -- and certainly we have many examples of that.

It may interest you to know that the Animal Plant Health Inspection Service was the first regulatory agency of the United States Department of Agriculture.

We started our efforts back in 1883, more than 127 years ago, to eradicate contagious bovine pleural pneumonia.

Probably none of you have ever heard of it. That's because we were effective in doing our first charge from the administration. But, anyway, in identifying those current traceability tools, we have had several. They are effective.

We also have identified traceability gaps. Clearly his recommendation in the process is to fill many of those gaps and to provide appropriate message and justification.

Dr. Breitmeyer has specific recommendations. And because of the increasing familiarity and prevalence in size and scope, particularly involving a multitude of states, that bovine tuberculosis -- at least for the cattle industry -- could perhaps be an important consideration to enhance justification for the implementation and advancement of animal disease traceability.

And clearly, with the numbers that he presented previously and I have shared with you, the national animal ID requirements can certainly be justified in attempting to control and respond to that particular disease.

It is not the only disease that we have out

there. And, again, I share with you, there are many state individual diseases that are important in states as well as national in scope.

Identifying existing effective traceability tools. Again, whether or not they are metal ear tags, whether or not they are automated data capture systems.

Clearly we can -- something is better than nothing, again, in that regard to getting animals officially identified at least once gets us farther on down the road.

The experience that Dr. Breitmeyer has had -- again, I shared with you many of the significant disease investigation efforts.

The advantages to the automated data capture systems were advantageous to not only the state animal health officials but, more importantly, to the producers that were engaged in cooperating with those investigations.

He also identifies here that high-risk animals do need to be identified and whether or not these are breeding animals.

And I shared with you some of the data associated with that. We recognize in that same study I referenced from 2006 to 2007 that, regardless of official ID system -- and that included back tag and,

again, was focused primarily on brite tags and the orange tags -- that only 45 percent of the adult cattle had any form of official ID at that point in time.

So the breeding animal population is important to us in terms of a high-risk animal. It also is an animal that's been in the population longer than others and, from an animal disease surveillance standpoint, is critical to state and federal and tribal animal disease surveillance programs.

We recognize some of the disease frequencies we see associated with some imported cattle. We also recognize that those animals that move frequently and are commingled frequently, such as rodeo event cattle, do pose some additional risks in the population.

We spoke about how brand programs have assisted many states in defining what are reportable animal movement activities, but certainly those states that don't have those type programs, they are going to have to identify what those high-risk movements are and to define those reportable animal movement activities and/or events to appropriately capture data.

Can we build upon existing vaccination programs? Quite likely. Can we build upon the health certificates and ICBIs? Quite likely.

But, nevertheless, the issue of collecting

official ID and termination points would also be helpful to us in terms of, not only reconciling data, but to know that animals are clearly out of the system.

We referenced recordkeeping, both from the producer standpoint as well as through the various entities that are involved in animal movement activities.

Supporting the state database needs is going to be critical in being able to access the volumes of data that do exist and, again, the standardization so that, when they do cross state lines, they will be meaningful.

And in this process we hope -- and Dr. Breitmeyer shares his overall objective with this slide set -- to demonstrate the established need as to why we need to advance animal disease traceability to be able to reduce size and scope and cost to our livestock industries.

Dr. Myers.

DR. MYERS: Thank you, Dave. I appreciate you filling in for Dr. Breitmeyer today.

There was a lot of detail in that presentation, but I think the underlying point and theme there is that this is a good example of one state's experience in how some of the gaps that we have with

traceability really do have an impact on the state and on the issues in that state when they are trying to deal with a disease situation like tuberculosis.

So what I would like to do now is to turn our attention to really the meat of what we need to be discussing here today. So I will be reviewing and clarifying the new traceability framework that we have been working on.

And then, after that, Dr. Keith Roehr is going to summarize the traceability forum that was held by the working group back in March with the states and tribes and to share the concepts about the traceability performance standards that we are going to be discussing a little bit later in our breakout discussion groups.

And that's where we are going to be looking for your feedback.

So as I mentioned in my introductory remarks, on February 5 the Secretary of Agriculture announced a new framework for animal disease traceability.

And he did that in the context of disease control. So along with this new framework, I wanted to mention that we are also looking at how the agency works with our state of industry to prevent the entry of diseases and successfully responding to animal diseases.

Two examples. We have developed in recent months a couple of concept papers for revision of the bovine brucellosis program, as well as the bovine TB program. We published those concept papers back in the fall and are seeking input on those programs.

So if you have not seen those, I encourage you to take a look at our website and to look at some of the new approaches that we are taking for those two long-term well-established programs.

So, again, developing a new approach to animal disease traceability is done in that broader context of how we all collaborate together in responding to animal diseases.

The new framework that the Secretary announced is intended to be a flexible coordinated approach. And by "coordinated," we mean that it's coordinated with states, tribes, and producers.

And it's focused on embracing the strengths and expertise of states and tribal nations. So we are really at this point turning to the states and the tribes to take leadership in how the new traceability framework is established.

We intend to support those efforts with federal funds and resources. The Secretary has made it clear that he does not want this to be an unfunded

mandate, and I will talk a little bit about funding later in my presentation.

The traceability framework needs to be developed around appropriate standards. Again, that's what we are going to be focusing on in our discussions here today.

So over the next few slides, what I would like to do is describe the fundamentals and the regulatory changes that are coming up with regard to developing this new approach to traceability.

So if you haven't had your coffee yet, you are not quite awake, I will give you fair warning that this slide and the next one are the two most important ones that I am going to have in my presentation.

This slide shows the six fundamental building blocks of the new program. First is that the traceability program would only apply to animals moving interstate.

So from the federal standpoint, the regulations that we are developing are focused on traceability requirements for animals that move interstate. Animals that stay within the state, that is not a traceability issue that the federal side is going to be looking at.

Second, we want to build upon what has been

successful. And you have heard in the previous presentation some of the discussion about the brucellosis program in the past as being an important source of identification and how that has reduced over the years.

But you also heard mention of the scrapie program. That's a very successful and ongoing program that has a very high degree of traceability. So we do want to build on those areas where we have been successful in the past.

Third, the real priority right now, where we see the major gap, is with cattle traceability. So we really want to focus on cattle.

We see good traceability with -- a lot of identification for poultry, for swine, and have already mentioned the scrapie program. So we do see good traceabilities in those areas. So right now we are mainly concerned about cattle.

So in order to do that, we would like to get back to the basics and to utilize cost-effective identification. And so one example of that is the nine-character silver or brite tag that Dr. Morris mentioned a few moments ago.

Our deputy administrator, Dr. Clifford, has been saying repeatedly of late that we need to get tags

in ears and we need to be able to record distribution of those tags so that they are traceable.

So we recognize that this is a very basic, very low-cost approach. We do recognize that a lot of folks have put a lot of time and effort into other forms of identification, such as RFID. We will still allow for the use of those, if you choose to do it, but our efforts are going to be making sure that we are at least focused on the basics, cost-effective approaches.

We do hope to make progress over time. We need to identify where we can be as successful as we can as quickly as we can and then look for ways to encourage increased progress and increased -- or enhanced traceability over time.

And, finally, as I mentioned, we do want to allow for advanced technology. Again, for folks that are interested in using that, we want to make sure that that is still available.

So in order to implement a new approach to traceability, we will need to develop regulations in order to do that. And so we plan to publish a new animal disease traceability section in the Code of Federal Regulation, 9 CFR. As I mentioned previously, it will focus specifically on animals moving interstate.

So our conversations today are designed to

help collect information and input from you on those regulations that need to be developed.

Within this new section of the Code of Federal Regulations, we intend to consolidate the current identification regulations that exist for disease programs. Consolidate them all into one section.

So things like the scrapie program where we have traceability requirements already in the regulations, those will get consolidated. The new regulations would not supersede those. We will keep those current rules in place that have been successful in programs like the scrapie program.

We also need to review Section 71 of the code, which has some general requirements for interstate movement. And Section 71.18 and 19 have some specific language regarding the interstate movement of cattle and swine. So we will have to review those and make sure that that folds into this section of the regulations.

And the new regulations will define traceability performance standards. That's really going to be the cornerstone of the regulations.

And I have mentioned that a couple times already, and Dr. Roehr is going to devote almost his entire presentation on those performance standards.

But just for the sake of definition, a performance standard is a rule which specifies a desired outcome and how that desired outcome will be measured. But it does not define specific methods of reaching that outcome.

So in other words, as Dr. Roehr will explain in a little while, it will set some standards, some goals, for what traceability should achieve. But it's not going to say, You have to use this type of tag at this time at this place in this ear. It's not going to be that kind of a specific regulation.

So, again, that's where we are going to need your input today, to talk about what those performance standards should look like.

And, again, the requirement is going to be focused on official animal identification for animals moving interstate. We do have some definitions in the regulations right now on what constitutes official animal identification. And, again, the focus is going to be on that interstate movement.

The USDA is making a number of commitments in order to support this new approach to traceability. First, we want to capitalize on the progress that we have made to date. We don't want to throw away absolutely everything.

So we want to recognize that a lot of folks, a lot of states, have invested heavily in our prior program, whether it be identification systems or database systems. So we want to capitalize on the good parts of what we have achieved so far.

We do want to provide information systems and support the development of data standards and guidelines for those information systems to the extent that the states want to adopt those and use them.

Again, this is going to be a state- and tribal-driven system. That's where the data is going to be held.

The federal side would only have access to the data as needed during disease occurrence. So as states identify how they want to approach traceability within their states, we will provide support and systems for them to achieve their goals.

We are collaborating with states, tribes, and industry. And this meeting today is one example of that collaboration.

I have mentioned the working group that Dr. Roehr represents. This is a federal tribal/state working group that is advising us on performance standards and a number of other issues.

But we also intend to have another working

group at a later point, as the program develops, to help advise us on other issues.

And also the federal advisory committee that we used to have was called the Secretary's Advisory Committee on Foreign Animal and Poultry Diseases. That advisory committee has been revised and renamed as the Secretary's Animal Health Advisory Committee, I believe is the current name.

That we hope to get up and off the ground in the fall, and that will be another avenue for input as we develop programs. There will be a traceability subcommittee of that Secretary's Advisory Committee, hopefully, again, later this fall.

And, finally, I had mentioned earlier that we do intend to fund the implementation of this, and I will talk about that in another slide or so here. Again, the Secretary does not want this to be an unfunded mandate, so we will provide financial support to achieve this traceability framework.

I just want to talk a couple minutes about the VS 2015 initiative because this traceability approach is just one example of the way that Veterinary Services within APHIS is moving forward into the future.

We are looking ahead and trying to identify the forces that are driving services that we provide to

the public. There have been a lot of changes in recent years in animal agricultural and how industries are structured with a lot of vertical integration. There's a lot of new technology, whether it be for diagnostics or disease treatment or animal management.

There have been a number of emerging diseases over the years, and we expect to see new and reemerging diseases to always be a challenge for us.

Food safety issues have become more and more in the public eye, and there's a growing expectation among consumers that we have an approach in how we deal with food safety and animal health issues.

There's been an expansion of international trade over the years, and that we expect to continue. The President has announced his national export initiative where he would like to see a doubling of exports from the U.S. over the next five years.

And then there's also the challenge of budgets. At best our budgets are flat, and at worst they decrease. So that poses additional challenges.

So given all of those challenges, we in Veterinary Services are trying to meet those animal health challenges and are trying to strategize for how we can do better over the coming years and maintain or promote ourselves as the national veterinary authority

in the U.S.

And we really can't do that without good partnerships with folks in the industry and producers in the states and tribes. And so this work that we are doing to enhance traceability, again, is one example of that type of collaborative approach that we see ourselves taking as we move into the future.

So with that collaborative approach in mind, how do we move forward together with traceability? Again, we want to achieve basic effective traceability, so we are kind of returning to the basics to make sure that we can do that.

We don't want this system to overly burden producers, and so we are focusing our efforts on those animals moving interstate. We heard a lot of feedback last year in the public meetings about concerns about overly burdening producers and having identification for local movements, so we are not focused on that at all.

The message that we also heard last year is that the states and tribal nations are the ones best suited to know and understand what goes on within their states and what types of traceability solutions will really work with them. So we really are looking to states and tribes to lead this effort.

Again, we want to make sure that the

traceability data is owned and maintained at the discretion of the states and tribes. Again, we, as the federal authorities, would not have access to data unless it was necessary in a disease situation.

And, finally, we are, as I have mentioned already, encouraging the use of lower-cost technologies.

I mentioned financial support a few moments ago. We have to look for Congress for support for this program through our annual appropriations. Congressional expectation is that our efforts are outcome-based and that they are realistic and yet they produce the results that are necessary to assure adequate traceability.

And, again, that's where it comes back to having appropriate performance standards in place and good partnerships with our state and tribal counterparts in order to assure the folks that provide funding for this program that we are meeting those expectations.

For the current fiscal year, 2010, we currently have approximately $14 million for this program. And in the President's 2011 budget, a similar amount was requested. And, again, future funding really does depend on our success collectively with having an effective traceability program in place.

So as I mentioned, we are working on a

proposed rule, and we are asking this federal and state tribal working group to help us draft that rule and to identify the underlying performance standards that we need to support the rule.

So this is the objective, the charge, that we have given to that working group, and that is, "To draft the framework of a rule whereby States and Tribes will be responsible for their animal disease traceability programs and where compliance to traceability performance standards directs interstate movement of livestock from the geographic area each State or Tribe is responsible for."

So, again, focused on state and tribal folks as being the drivers of the program, and the federal requirements are focused on interstate movement.

This is the list of members of the working group. And we do really appreciate Dr. Keith Roehr being here today to represent the group and to speak with you here in a few moments.

Along with the traceability performance standards, there are a couple of other responsibilities that the work group has.

So the second one is to assist us in the development of protocols for evaluating tracing capability and to look at the issue of compliance. How

do we handle situations where states are unable or unwilling to comply with the federal requirements.

So, again, the real focus today is obtaining your input, and there are a number of ways that we are doing that.

We in APHIS provide regular updates on the progress of the working group. We have a website, and I believe that is listed in your package. We are holding public meetings like the one today, and there will be additional industry meetings as we go along. We are meeting, as I mentioned, with state and tribal counterparts.

As this effort continues forward and we get to the point where we draft the regulatory language, we will be sharing that regulatory language publicly before we publish a proposed rule. So you will have an opportunity to take a look at that, that proposed rule language, before it actually gets into a proposal.

And then we have developed today -- and it's in your packet -- the first draft of our traceability performance standards for discussion, and that's what today's focus is going to be.

We also have other opportunities for you to submit your ideas. Here's the website that I mentioned already.

Today's public meeting and the two that we had last week carried with it a written comment period. So through the end of the month, if you go away from this meeting today and come up with another idea that you didn't have an opportunity to express today or if you have friends that couldn't make it and want to make some comments, there is an opportunity through the Federal Register notice process to provide those written comments through the end of the month.

The states and tribes, we are encouraging them to have discussions within their states, within their areas, with their local industries. And you can go back to your state and encourage those if you haven't seen those discussions occurring yet. And that's another opportunity for your state to provide feedback to one of the working group members.

We will continue to hold tribal consultations and also look for opportunities to attend national industry organizations and groups to share information there. So we are trying to get out as much information as we can and to collect as much input as we can.

Finally, here's our general timeline. We hope to publish the proposed rule by next winter or sometime next winter. I was reminded that winter ends

in February, so we are hoping to have it at least done by January or February next year.

That proposed rule will carry with it a 90-day comment period for folks to comment. And then we would hope to publish the final rule, after taking into account all those comments, about 8 to 10 months after the close of the comment period.

We recognize that some animal ID traceability performance standards may need to be phased in over time, so the rule may account for that.

And, again, as you have your discussions today, if you think there are things that can be done now and there are other things that could be phased in over time, please make those comments as you have need in your breakout groups.

So with that, I would like to turn it over to Dr. Roehr. He'll pick up where I stopped and talk about what those performance standards are, how the working group has worked to develop those, and to really set the stage for the breakout discussions that are going to follow his talk.

So, Keith, the podium is yours.

DR. ROEHR: Thank you, T.J.

When I agreed to be on this working group and when I initially was asked, I thought, Well, this is

a topic and a system that's been through a lot of different changes in the past, and I thought I would definitely have some opinions, and I would be happy to be a part of that group.

But at the same time, I was asked to be part of the group and I told a few people at the start within our division that I was going to be working as part of this group with other state animal health officials and some tribal nations, and I thought I would just leave it at that.

And if the outcome of this was favorable to everybody, then I'd go back and tell them I was part of that group that was responsible for putting this federal rule together. If it wasn't so popular, I would just be kind of quiet and nobody would know the difference.

It turns out, I went to a livestock market association meeting just recently, and we had been to Kansas City. I think -- Neil, did we have 40 state animal health officials at that meeting?

So I think probably 80 percent of the state animal health officials, a number of the USDA folks, and many of our tribal nations were represented.

After I got back from that meeting and went to the livestock market association meeting, all the notes of proceedings from that meeting were freely

handed out. There was my name in that, so I figured I was no longer anonymous.

I think this is an important issue. I think we all recognize that. For those of you who traveled to Colorado today, welcome. Thank you for traveling. For those of you who are here within the state, thank you for taking your time to meet with us today.

This is an important issue. And what I think of, as previously being a private practicing veterinarian -- and many of you that are producers.

The legacy of animal health in the United States is part of what we are looking at in our future. This legacy isn't USDA's legacy. It's not state animal health officials' legacy. It's a disease eradication effort that's been going on for decades.

In 1917 when they started the TB eradication effort, 5 percent of the U.S. herd was infected with TB. That's one out of every 20 head. And today we are at about 3/10,000 of a percent of infected cattle in the United States, but we are not winning that battle.

I think at one time -- back in 1995, when I first came on with the State, we were seeing a definite decrease in the incidence of both brucellosis and TB.

And presently in the United States, we have one infected herd with brucellosis that's in Idaho.

Unfortunately, with TB, that's not the case. We have a number of herds in a number of states.

So I think there was some hope at that time in 1995 that these two diseases would be eradicated in a short period of time. And, unfortunately, that's not the case.

And one of the key tools or systems that hasn't functioned as well as what we would like, to accomplish the eradication of those diseases, is an animal identification system that would enable, for disease tracing capability, a tool to eradicate disease.

So, again, the sacrifices that were made toward reducing the incidence of those diseases were largely producers. Producers whose herds were quarantined, who assembled their herds for testing, and aided in the accomplishment of reduction of those diseases.

So as we go forward, that's what I see. We are at a crossroads. We see a system that at one time was probably working more effectively than it is today.

I remember looking at a map of the state of Texas when I was in veterinary school in 1980, and in some of the counties in Texas, there were 50 or 60 infected herds per county. And tracing was an active part of what they did on a daily basis to help reduce

disease.

And today we still have disease traces, and they're daily, but they're nothing like what they were before. So some of the tools and some of the working out of those disease programs still occurs today, but it doesn't occur as effectively and there's gaps that we've located in those systems.

So with that as a preamble, I will go and tell you a little bit about what we are doing as we move forward in this working group.

The objective of the working group is to draft a framework of a proposed rule. It will be a federal rule that would be put in the Code of Federal Regulations. And this rule will do two main things. It will give states and tribes the responsibility for their traceability programs.

I think this is key. It gives some flexibility for the states. Because the way we manage our animal health programs in Colorado, it could be very different from what they may do in Mississippi.

We're a brand state. There are 14 brand states. I think we have some inherent advantages, not just in the fact that we use brands as a method of identification, but we have a structure with 60-some brand inspectors who are boots on the ground who help us

daily in animal health issues.

But every state is different. Every industry is different. So having some commonality in requirements and performance standards for disease traceability is going to be exceedingly important.

But then giving the flexibility in the requirement and the ability for states to administer their own systems and programs I think is going to be very important.

Second is to direct interstate livestock movement through compliance with the performance standards. So if we have performance standards that are common, then we have a national system that could mean the same yet with flexibility between the states.

The working group is responsible for providing input on a proposed traceability rule. The group will do this by recommending the traceability performance standards, and we will talk a little bit about more specifically about what those will accomplish.

Second, methods of evaluating the traceability through the states to accomplish those performance standards. And, third, we will talk about -- or the third is a system to evaluate consequences for noncompliance and then perhaps some

incentives for compliance.

So what is a traceability performance standard? The performance standard describes a desired result or outcome, but not the methods for achieving the outcome. So this is where some of the flexibility between states comes in.

Performance standards provide a process for having the methods that a state might use to accomplish animal disease traceability and make those able to be evaluated equally.

So in concept what this could be compared to as an analogy would be a system to evaluate cars or vehicles and look at a standard like miles per gallon.

So in that car or in that truck, regardless of the number of cylinders, the horsepower, whether it ran on gas, diesel, or a hybrid doesn't matter. What we would be evaluating is the miles per gallon and have a uniform common standard with that.

So traceability performance standards will provide a uniform method of evaluating a state tracing capability regardless of the method used.

Whether a state or tribe uses in this case a sophisticated electronic-based system where you would have some automated data capture using RFID tags or whether you have a state that uses a paper-based system,

both of those systems would be able to function.

I think, if you look at different states right now and look where their capability is, there's a lot of variation. Some states, based on need, have moved ahead quite a little bit.

I think Michigan is probably a good example of that. Because Michigan has a TB infection that is in wildlife, they have done a lot of movement within their state that they documented.

Since they have different zones within that state, they have a system where they are required to use RFID, and they put that data into an automated system. So they can query information about intrastate movements and interstate movements.

And other states are using primarily disease control programs, eradication efforts as the backbone of their traceability. For cattle, TB and brucellosis.

So the standard should focus, as we move forward, on tracing animals and not necessarily be disease specific, although the information used in a specific disease situation may differ based on the disease itself.

So as we -- if we look at these traceability standards and we begin to evaluate the state capability of meeting those standards, we may use some specific

disease information, for instance, an official cathode vaccination tag as part of our ability to evaluate that standard.

What's a traceability performance standard? The standard includes a measurable activity and then a measurement such as tracing animals that were officially identified. And then the example would be to come up with a traceability performance standard with both of these.

For example, trace animals to the state or tribe in which they were identified. We all know that, with a brite tag, there's a state code on that. With other tags, we can go to an animal identification database to determine the state where they were identified.

And then the measurement in this case could be, what percentage of the time can we accomplish it?

For example, with one of our first standards that we will talk about later, our work group determined that we thought it was reasonable that states could accomplish that performance standard 95 percent of the time, 95 times out of 100, and we could accomplish it within a certain number of days.

So how is the standard developed? The first principle in establishing any performance standard is

determining what's being measured.

For animal disease traceability, the work group considered the typical actions taken during a disease trace-back event that would involve interstate movement.

So examples would include or could include notifying or contacting a state or tribal nation from where a shipment originated. Second, notifying a state or tribe where an animal was officially identified.

And, obviously, when we look at this, we think about cattle. What do we think about tools? We think about official identification devices, ear tags. And then we think about movement data.

And that may be interstate certificates of veterinary inspection. It may be movement permits. We have other tools, commuter agreements. We have some agreements with private companies.

In the swine industry, we have agreements to move pigs through different phases of a production system -- from farrowing to weaning to feeding to slaughter -- or fattening and then to slaughter, and some of those movement agreements are held by industry.

So how is the standard developed? What we did, the next step was to define the value or a timeline for achieving the action and then using criteria such

as, How long will it take to accomplish, or, How many work- or how many person-hours would be needed to accomplish a specific task or a specific performance standard?

And I guess right now we do these things, but these aren't questions we are asking. We got involved in a trace-back recently that involved -- and I will talk about this a little bit later -- about a specific cow that we were tracing.

And we worked by that -- worked on that daily. We had epidemiologists within USDA. We had veterinary medical officers and animal health technicians and we had veterinarians. We all worked together to do that.

But then really measuring the time in which we do it, we don't do that. It varies. And it varies with the importance of it.

Sometimes we get traces that we can tell on their face may not have a lot of meaning. It's kind of checking the box, just to make sure that we can resolve a situation. We have other traces that, from the outset, we can tell are very significant, and we will put a lot of resources towards those.

So the next was establishing a baseline. To establish the baseline and determine where we are at

today, we need an acceptable standard value for each activity that's meaningful and achievable.

And, again, when we look at this, to having an acceptable standard on a national basis, we have a lot of variability.

We have some states that are brand states. We have some states that have some tracing capabilities already, and then we have other states that just work with performance standards.

We have some industries that are different in different states. In Colorado, we are a beef state. We have some dairy industry. We have some swine. We have some poultry, but the predominance of our industry here is beef.

So, again, having that baseline that is nationally recognized or acceptable will be very important.

So how is the standard evaluated? In this performance-based approach, we need to evaluate actual tracing capability and see if it meets the performance standard.

This evaluation could involve measuring the tracing performance for an actual disease investigation and a trace of suspect reactor animals. We have enough of those all the time in states where we can actually

see how the rubber hits the road and see how we actually trace animals that are officially identified, either through back tags or ear tags and other brands and other methods, and determine how we can evaluate that standard.

We can also look at test exercises or check tests and use available data through randomly selected test charts or cathode vaccination records, interstate movement certificates, and other records -- commuter agreements and such. So there's a lot of different ways that we can begin to evaluate a standard.

Other descriptive requirements may be established also. And one program that we have looked at that's been very acceptable or very effective and has a national standard is the scrapie disease eradication program.

In scrapie we talk about consistent state status. And each state is required to have met certain standards within the scrapie disease eradication program to get that status.

If they don't have that status, that state may have to do additional work to measure up. So that's what we are looking at here, again, are performance standards, what is the state's capability, and then how do we measure those outcomes.

So we recognize that, while the evaluation process must be officially administered, it has to have achievable and accurate results.

What are consequences for noncompliance? Many people have asked, What if the state or tribe doesn't achieve performance standards? What happens?

The compliance parameters need to be meaningful. They need to be uniform. They need to have some consequence included, but they don't need to be heavy-handed.

They may include incentives as well. The cooperative agreements that have been effective in disease control programs and have been used within the present animal -- or a previous animal ID effort could be one tool that may be used as an incentive.

I think that the key is, if there are problems within a state, making things more difficult for a state that's already having trouble is recognized as perhaps not being the right mechanism. So there's a lot of different ways that we can move ahead.

So right now we don't know what those consequences will be. But your input into the traceability working group on this issue is going to be important as the group comes up with recommendations.

Working group progress. Today the

traceability group has had weekly conference calls. I think weekly is maybe an understatement.

Neil, I think it's more like bi or triweekly. We have about two or three a week at times. And we have had one face-to-face meeting as well.

We have discussed the following topics: First, we talked about the key points that came out of the traceability forum in Kansas City, and that meeting was held March 18 and 19.

And, again, we had over 40 state animal health officials present at that meeting, a number of tribal nations represented, and then a number of folks from USDA Veterinary Services.

The other thing we have talked about is what tools or standards do state or tribal animal health officials need to measure and to adequately access their tracing capability.

Some of this just involves upgrading of existing programs and tools that states use, and then some of it will be moving forward with new tools that we derive from our working group.

What are the current animal disease tracing capabilities of states and tribal nations? And that's something we have talked about.

Every state is different. And in this

working group, we have state animal health officials from -- is it Delaware, Neil, that Steve Crawford is from? New Hampshire. I knew it was one of those small states back East.

Becky Brewer from Oklahoma; Jim Watson from Mississippi; Marty Zaluski from Montana; and then myself from Colorado.

So I think, with the diversity of those different states and the livestock industries within those states, we should be able to get a good perspective.

We also have five tribal animal health officials, too, that have different size tribal nations and different industries within those tribal groups.

The other question we have asked and discussed is, what are appropriate performance standards that will measure a state's capability? We will get into that more here in just a moment.

The working group also discussed the following topics: What classes of livestock should be exempt from certain requirements or what types of classes of livestock might be phased in at a later time?

I think one of the things that was probably recognized with previous efforts before in animal identification was a pretty bold approach of perhaps

having a system that would trace all animals back within 48 hours.

And I think perhaps, with certain types of movements and certain types of livestock, that's already feasible. In the future, as we work forward, we can phase in. We can learn -- as we learn our capabilities, we can learn what compliance may be.

How should tribes or states be categorized with performance standard compliance? What should be the consequences for states' noncompliance?

Some of that may be that, if there are certain parts of traceability that aren't accomplished, there may be other methods of learning that information, and it might require greater information to be recorded on certificates of veterinary inspection and other methods of filling in gaps.

It may be more time-consuming, so there may be an incentive for a state to meet those performance standards from the start.

And then, How should the working group's progress be communicated to the public? I think these meetings are probably one of the first public efforts at putting information out.

I had some communications -- we have a Colorado animal ID working group that's met a number of

times, and we've had some communications with folks within that group.

But I think, when we get closer, we have -- I think, a real pivotal time for the work group to communicate will be when we have a draft form of the rule that will come forth.

Neil, the timeline on that is later this summer? Is that accurate for right now?

I think we are getting closer. We have a lot of the pieces together in that rule-making process.

So let's look at today. How do state animal health officials trace animals for disease purposes? Animal health officials routinely do many things to trace animals that are affected with program disease that's targeted for surveillance, monitoring, control, or eradication.

Tracing activities are not rare events. We deal with these issues on a daily and weekly basis. It's important that we build on what's done, is successful today, and then certainly identify areas that need improvement in the future.

We said before that a lot of what we have today is built on program disease efforts. And yet one of the things that I think was definitely identified in our Kansas City forum -- animals that are routinely

officially identified at slaughter, there's a lot of suspicion that some of those tags may not always be collected by the food safety inspection service veterinarians or technicians.

So if an animal is identified and the tag isn't collected at slaughter, there's a gap that needs to be corrected.

I think there's a lot of -- when we have done animal traces, a lot of times we find information on certificates of veterinary inspections that are very detailed, very accurate. And sometimes there's enough information missing that it may be difficult to fill in the gaps.

The working group has spent much time identifying the activities that are necessary to support an adequate animal disease traceability plan. Some of those things are, for instance, tracing an animal to a state or tribal nation where it was officially identified.

And for the purposes of cattle, what do we usually think of? An ear tag for official identification.

Second, tracing an animal to a state or tribal nation that it was shipped from. The tool we think of here could perhaps be a certificate of

veterinary inspection or other type of movement permit.

Next, tracing an animal to a herd of origin. We do this a lot to accomplish testing needs. We want to know what herd the animal came from.

Next, finding all herds that an animal has been in; that tracing back. So we want to determine previous potential disease exposure. Tracing movements into and out of herds for the purposes of determining potentially exposed animals with contagious disease.

Next, identifying adjacent herds for disease monitoring and surveillance. And here would be cross-line fence contact for potential disease spread.

Then, last, notifying the state or tribal nation of origin of the animal's movements. We share information and communicate with our state partners frequently for the purposes of animal health and disease control.

What activities are related to interstate movement? Some of the activities mentioned are directly aligned with an interstate traceability framework that was envisioned by Secretary Vilsack. So interstate movement, I think, is the backbone of what we are looking at as we move forward.

And what that does in many situations is create a bookend. When I thought of bookends previously

in previous discussions, a lot of times we talked about birthplace and then slaughter capture of information.

But you can have other bookends within a book that may be chapters. In other words, if an animal is identified in a certain state, tracing it back to the state from which it was identified. Or if an animal was moved from a state, tracing it back to a previous location prior to that movement.

So one activity that we look at here is tracing an animal to the state or tribe that was originally identified. Here we think, again, of one tool being an ear tag.

And then tracing an animal from the tribe or nation from which it was shipped. And here again, a certificate of veterinary inspection.

And then the other part is the communication piece of that, when you have an animal of interest that we're tracing, is notifying or communicating with states or tribes -- tribal nations of origin.

So these events provide the appropriate basis for interstate traceability performance standards.

What are current capabilities? We need to measure existing capabilities for the same or similar performance measures so they can be properly documented into a process.

As a state animal health official, we encounter actual investigations that document current capabilities are inadequate.

Since I am a state animal health official, I can tell you a little story. We had an animal of interest from slaughter. It was slaughtered in Tolleson, Arizona. Shipped out of La Junta Livestock Exchange.

And this particular animal was a TB suspect. That slaughter was a lesioned animal. They did a histopath, and they found a mycobacterium compatible organism. So we had TB that was growing within the animal.

From that, they did a PCR test. The PCR test was negative. So we were a little bit -- perhaps a little bit less concerned about this particular animal but still very much an animal of interest.

So in the meantime, while we were waiting for this organism to culture or not culture, which takes about four to six weeks, we did a little bit of considering of this animal. Basically what we knew about it, she was a black cow. She had no ear tag. And the back tag either fell off or wasn't harvested at the slaughter plant.

We knew from the kill sheets how many

animals were in that particular group that was purchased from La Junta Livestock, and then we could go back to the sales records from the livestock auction market for that particular day.

Through that effort, we could -- we had 22 different sellers into that group. And we could look at some that we could weed out that were black and whites that were Holstein. We figured, if we had a black cow, they would probably tell us it was black and white.

At any rate, at the end of the day, we could probably eliminate about 11 of those sellers -- that had that. And the rest of the story of this particular cow was a mycobacterium avian.

So it was an avian form of TB that was the contaminant and essentially doesn't cause disease in cattle, but confuses the test.

But at the end of the day, with our current tracing capability, we could narrow those herds down to 11 herds.

The next step, had that been M. bovis, we would have been going to 11 herds, requiring the producers in those herds to assemble their herds for testing, and we would have been doing at least one TB test. The suspect animals that would have been doing comparative tests would have -- if those tests were

still inconclusive, those animals would go to slaughter.

So working with that disease system -- in my mind, the system that we have that USDA Veterinary Services tells us that 28 percent of cattle are presently officially identified at slaughter -- we still don't know how many of those tags are officially collected.

So I think the question is, is our present system adequate? I think what Rich Breitmeyer -- and Dr. Morris talked about today is limitations of program disease. I think that what I would have to say from my perspective is, those systems' current capabilities that we have right now aren't adequate.

We don't have a good baseline for an accepted minimum standard of animal disease traceability. And the veterinarians and animal health technicians that currently conduct disease investigations don't typically capture or require the time required to do the collection of tracing data.

So we really don't have a standard and we really don't have times affixed that we think are appropriate within each state.

The federal disease traceability rule that we're working on at this time would establish a baseline and evaluate national tracing capability with the help

of states and tribal nations. And certainly a very important part of that is from industry.

State participants in the cooperative agreements. We'll document right now current traceability through their fiscal 2010 cooperative agreements that are in place right now. So we will get some data back from states in those programs.

And then, in addition, USDA will evaluate tracing capability within their disease control programs on a national level. So this information will be assimilated together to try to look at where we are at today. What minimum standards do we presently have?

Current thinking of general requirements. The working group has started to draft some ideas that should be included in the new Code of Federal Regulations rule.

Some of the following included are: All livestock moved interstate must be officially identified. Let me put a little caveat on this one when we say "all." There will be some exceptions. But they will start by saying all livestock need to be officially identified.

Obviously, this means different things for different species. Poultry and swine presently are many times identified by lot. If they are in a system that

is a vertically-oriented production system, you can trace movements very effectively and go back to a premises of origin by lot, and it works very well.

With cattle we always think of ear tags. There are some other official identification devices that have been used. Brands is one of those. It works very well when cattle still have their hides on. It doesn't work so well after slaughter when their hides are removed. And then ear tags.

We have also talked about all livestock moved interstate must be accompanied by certificates of veterinary inspection. Again, there's a number of exceptions that exist -- and I will talk about that a little bit later -- that are common practices today that accept those requirements.

Livestock not required to be accompanied by an interstate certificate of veterinary inspection must be accompanied by movement permits. Movement permits are commonly used in different states. I don't think any two states are exactly alike, but that permitting process can be very effective.

And then last, ages and classes of animals to exclude from the regulations will be defined in an exemption paragraph.

So all livestock moved interstate must be

moved in compliance with all applicable provisions of program disease regulations.

So the rule that's being developed right now would not be in opposition of existing requirements in the Code of Federal Regulations for TB, brucellosis. And then other disease programs as well. For horses, equine infectious anemia. For swine, pseudorabies eradication programs and such.

Exemptions. The working group has recognized that the current federal rule already contains identification exemptions for certain ages and classes of livestock.

We further recognize the importance of differentiating between the needs of official identification and the need for recording identification onto certificates of veterinary inspection.

This exists right now. In most states, if you write a health certificate for feeder cattle -- I see these come in every day -- and they say 53 head of steers and heifers and have an approximate age and lines written down throughout.

If it's breeding cattle and you are shipping them into Utah, they need to be official cathode vaccinant, and they are required to list individually the individual animal identification of each animal

shipped.

And in some movements that are private sales this happened. I had some livestock markets who already, for interstate shipment purposes, are already doing that because it's required for an import requirement to move into another state.

Other exemptions. The current federal rule at 9 CFR -- if you want to look this up, 78.18 -- exempts cattle of any age being moved interstate for normal ranching operations where there's not a change of ownership to another premises that's owned, leased, or rented by the same individual. These are commonly referred to as commuter agreements.

Colorado has commuter agreements with each state we have a common border with. In Colorado they may be a little bit different. Our requirement is that they be a fully assembled breeding herd for at least a year. So in Colorado, with other states, we exempt trader cattle from those agreements.

The main purpose of those agreements right now is to alleviate the need of testing for certain entry requirements.

They used to be built for -- primarily for brucellosis. But then when New Mexico lost their TB status, we used those commuter agreements to exempt

owners from TB testing requirements each time they crossed the border. So those have been very effective.

The backbone right now of commuter agreements is for the purposes of trichomonosis. We ensure that every -- each herd owner annually tests their bulls for trich, and those have decreased the incidence of trichomonosis in Colorado markedly.

Another exemption for livestock moving between states that's been commonly used are swine -- a recognized production system -- and they are exempt from identification requirements. And that's already in the Code of Federal Regulations.

Some classes of livestock movements, like direct to slaughter, are exempted from individual animal identification requirements.

I think the key with what the Secretary of Agriculture is envisioning, if cattle are required to -- and, for instance, breeding cattle are required to be individually identified -- it will probably increase the numbers of cattle identified overall.

And certainly the goal or hope would be that we would go somewhere up from 28 percent of our herd being identified for cattle right now.

So we need input at this time to address and find out what the needs of the industry are and then

still move forward in improving interstate animal disease traceability.

So current thinking of states and tribes. Some states and tribes have already implemented animal disease traceability plans for various species of livestock that are consistent with standards referenced in the federal rule and in USDA's traceability performance standards document, and may be considered already to have what we call status.

We haven't figured out a name for that yet, consistent state status, the way some states have for the scrapie disease control program. Some states may already have status through what they are doing.

Other states may need to augment what they are already doing. Other states may start with new systems. I think that's where the flexibility in making this a collaborative industry will be very important.

Further, the traceability working group recommends that all livestock moved interstate, unless exempted, from a state or tribal nation be consistent for traceability or the state would have to meet additional requirements.

These additional requirements have not yet been defined, and the name of the state status designation is yet to be determined.

There will be a separate status for each species. In other words, if the swine industry in Colorado was having problems in meeting a consistent state status, it wouldn't have an outcome or a negative effect on a beef producer. If we have problems with a poultry system, it wouldn't have a negative effect on a cattle producer either.

The goal of this listing for state or tribe status is according to species. And then eventually it may be posted on the Internet, so it would be available for public viewing.

So current thinking. As mentioned earlier in this presentation, interstate traceability performance standards must be directly related to animals that move interstate and not to intrastate tracing.

The performance standards recommended by the working group are going to be listed here on the next few slides.

In your packet I think you have this document. I think, if you begin to look at this, it will explain some of where we are going in the next few minutes in explaining this.

This is kind of where the rubber hits the road. These are the performance standards for

traceability.

State and tribal nations will need to be able to document a sufficient number of tracing activities to demonstrate that their tracing capability is consistent with standards.

The work group refers to animals used in the document -- tracing capability as reference animals. I think of those as animals of interest.

Their identities can be obtained from a variety of sources such as certificates of veterinary inspection, movement or entry permit, test charts, or slaughter sample collection forms.

The working group has used the term "a traceability unit" to refer to a geographic location that a state or tribe determines is needed to support the traceability plan. So I think this is another example of flexibility between states.

The traceability unit can be different in Colorado than it may be in Wyoming. Depending on the nature of the disease, the needs of the state or tribal nation, the size of the unit may vary.

The traceability unit could be a region. Or if it included more than one state, it may be a region of several states. The traceability unit could be a state or tribal nation. So it could be just the

boundaries of the state. It could be a county or a number of counties within a state. Or it can go down to being just a specific livestock operation or even a site within an operation.

If there was physical separation within an operation and we had an animal of interest that hadn't commingled with animals within that same property or premises, it may only be necessary to identify the traceability unit as a part of a livestock operation.

So basically it will be up to the state or tribe to determine what is appropriate.

The first performance standard -- and here again, if you look at your sheet, it will be No. 1 -- measures how long it will take the receiving state or tribe to notify the state or tribe in which the animals were officially identified.

This is already a relatively simple process. The working group has recommended that it should be able to be accomplished 95 times out of 100 or 95 percent of the time and generally within one business day.

So if we look at the description for animals that are required to be officially identified, how long will it take the receiving state or tribe to identify the state where the animals were officially identified?

Second, performance standard measures the

ability of a state or tribe in which animals are officially identified to determine the traceability unit. Again, that could vary. It could be the entire state, counties within a state, one county, or a specific livestock premise in which reference animals were identified.

The working group recommends that this process be phased in in order to provide achievable standards in the short term and then later higher standards for the long-range goal.

It's anticipated currently the records of tags applied are on paper-based systems, and it may take more time to research that than an electronic database.

So the recommendation in Phase 1 is that this activity should be able to be accomplished 75 percent of the time and within five business days.

So as we go forward with animal identification records and as they become more easily searched, the time required to find an animal ID device should decrease.

In Phase 2, our projection right now is that that activity should be able to be accomplished 95 percent of the time within two business days.

I think it's important to note how long that time period is between Phase 1 and Phase 2 may vary, and

it may vary between states.

But I think what we will do, when we look at capabilities of states, then we can come back and determine, are we meeting certain compliances?

If the states are all meeting that compliance of 75 percent within five business days -- if many of the states are exceeding that, it may make sense to move to Phase 2. That would bring forth a higher standard.

The third performance standard measures the state's or tribal nation's ability to notify the state or tribal animal from which reference animals were shipped.

So, again, if we are looking at learning where animals are shipped, we can rely on tools such as certificates of veterinary inspection; for movement data, movement permits and such.

In Phase 1, this activity, we have projected, should be able to be accomplished 95 percent of the time, but because we may be searching paper documents, it may take as much as seven business days.

And what I am thinking right now, a good example of something that we went through recently, we had an equine piroplasmosis. It's a blood-borne disease of horses.

The index herds or index ranch took up an area of six different counties in Texas. And when we actually found out where that was at, we went down to our warehouse and dug through boxes of data to look for health certificates.

And it took the better part of one day and four people searching through those health certificates to find all the horses from that six-county area that had entered Colorado.

There we had a compelling interest to do it. If it were a disease of lesser interest, we may have taken more time to do it. But searching paper records takes a longer period of time.

So Phase 2 of this activity, we feel, should be accomplished 95 percent of the time and perhaps, down the road, may be able to be accomplished in as little as three business days.

So if we go to the fourth performance standard, this measures the ability of states and tribes to identify the traceability unit from which reference animals were shipped.

The working group recommends that this standard be phased in just as for Standard 2. The activity should be able to be accomplished 75 percent of the time within five business days. And then Phase 2 be

accomplished 95 percent of the time within two business days.

So I think the key, as we move forward, is the time periods may vary between phases, and it will be a process of determining the capability of different states to meet these performance standards.

So how will this work? If we look at an interstate movement scenario where we have an animal that's identified in Iowa, and then that animal is shipped from Iowa to Nebraska, and then subsequently the animal is shipped from Nebraska to Kansas, and then finally from Kansas to Missouri, and then, when the animal is in Missouri, it's identified as a reference animal.

So we consider the interstate movement scenario that's laid out here and we look at this animal that was officially identified in Iowa, shipped to Nebraska, Kansas, Kansas to Missouri, and then at that time it becomes a performance animal -- or an animal of interest or a reference animal.

Even though there's many movements in this scenario, the performance standard activities can apply as a bookend. I talked about this a little bit previously.

We thought of the bookend before as

birthplace and slaughter. Here we can think of a bookend with these performance standards where the animal was identified and then where it entered interstate movement immediately prior to entering a state or tribe.

So in this case, for performance activities, Activity 1 would be that Missouri would be expected to identify Iowa. That is the state in which the animal was originally identified. So we would be putting the Activity 1 into play.

And then Performance Activity 2, Iowa finds out where the animal was identified. So they would be looking at the traceability unit within their state.

And if we look at Activity 3, Missouri would be expected to contact or notify Kansas, the state from which Missouri received the animal. So, again, here we would be looking at certificates of veterinary inspection or permitting or movement data.

And then last, Kansas would find out where the animal was shipped and what traceability unit from within their state.

So basically what we are looking at is each state determining where an animal may have been officially identified through a traceable ear tag with reference to cattle and then determining traceability

units through movement data certificates of veterinary inspection and such.

So I think this, to me, is where the rubber hits the road. This is where performance standards are used in real life situations. And we can take reference animals that are actual disease traces. We can create reference animals by looking at certificates of veterinary inspection or cathode vaccination records.

But we can look at a state's ability to adhere to these four standards. And I think, if we do these, these would have real life application and benefit for tracing animal disease and help us in disease eradication programs. So input needed.

And let's talk just a bit about compliance consequences. How do we determine compliance with identification requirements where we are at today?

We have talked about flexibility between states but still having states adhere to a certain requirement.

So if the state is meeting capability and they are recognized as a name that we are yet to determine -- but for the scrapie program, we call consistent state status -- they could have for that state incentives to be certain cooperative agreement funding or other incentives that provide an ease of

movement of livestock across state lines.

For states that are not in compliance, we need to think about consequences that would be appropriate to encourage that state to meet the compliance.

So these are issues right now that are presently being discussed in a subgroup of the working group, and they are identifying a number of tools that could be used to help states with status. I think that's where input from industry would be exceedingly important as well.

So with that, as we go break out into our groups and, I guess, T.J., take the next steps, the input from you folks that are here today, I think, is going to be very important to look at where we are at with our working group, look at where we are at with our framework, and begin to discuss it and get some ideas on how we can move forward collaboratively with an animal disease traceability system that makes sense for animal health and disease control programs.

MS. MILLIS: Thank you, Dr. Roehr. This morning we have heard from T.J. Myers reviewing Secretary Vilsack's traceability framework announced in February of this year and the progress that's been made since that time.

And then we heard from Dr. Morris, filling in for Dr. Breitmeyer from California, giving his talk about the importance of traceability as well as identifying some of the gaps that Dr. Breitmeyer had identified in California.

Dr. Roehr updated us about the traceability working group's activities as they draft the regulation and suggest performance standards. In other words, what activities are taken and how are they measured.

And now we would like to seek your input. You have heard these talks. You may have some questions or comments. And if they are not related to the traceability performance standard or how one could evaluate them, we are passing this list around to the tables, and we will ask that you would write your questions down so we can gather them.

In our third session today in the afternoon before we end, we will have an opportunity to address those questions. We just want to make sure, if three or four people are asking the same question, we can make sure that it gets out on the floor and gather any other questions or comments that you may have as well.

Now when we come back from break, what I would like to point out to you is that we are going to break into smaller groups to discuss these traceability

performance standards.

And we are going to put cattle on -- the folks who are interested in focusing on cattle as it relates to these traceability standards in the four corners of this room. We think that probably the majority of people will be interested in cattle.

And then more in the center we'll have folks that may be interested in other species such as poultry, equine, sheep and goats, or swine.

And we will have name cards out on the table. We'll just kind of see how it works out when we come back from break.

And then at each table will be someone from the USDA there to help lead the discussion, but we'd really like to get your input on these standards.

And we want to interrogate them and wonder, Are these standards, the performance standards, are these going to address the gaps in traceability? Are there other performance standards or measures that need to be identified?

And Dr. Roehr talked about exemptions. What kind of exemptions do you see or identify? So those are the kinds of discussions we want to have when we return.

So I am going to ask that you come back at 25 minutes to the hour. I have almost 20 after right

now. And we'll break out into those groups.

If you have any questions about how we are going to proceed, just stop me -- I will be in the room here during the break -- and I will be happy to clarify those for you. Thanks.

(Break was taken from 10:15 to 10:36.)

MS. MILLIS: Welcome back. We'll give you some time to gather at one of the tables according to the species that you want to talk about. I think most of the people are talking cattle. If anybody is interested in sheep and goats, we have that up front. And in the center of the room is equine and swine.

So to get us started back in this next discussion, I am going to ask Mr. Hammerschmidt to come up here and just give a brief review of what this topic of discussion is about. Neil.

MR. HAMMERSCHMIDT: Okay. Why don't we go ahead and try to get started with the first breakout discussion.

So in regards to the first breakout discussion, what we are trying to get some feedback on is in regards to really the substance, the meat, of Keith Roehr's presentation on traceability performance standards.

And I think, when we start to focus on

practicality or the merit or value of those traceability performance standards, I think there's some discussions you might want to consider first.

I put up Current Gaps in Traceability. If you are within the cattle sector discussion -- and that was already brought up -- What's the value in tagging slaughter animals moving direct to slaughter? Do we really have to have traceability?

Are they part of the population that these performance standards should be focused on? Probably not. My opinion. It's, where are the gaps?

So you might have some general discussions and see if you can come to a consensus on, What are the appropriate populations, classes, ages and so forth to focus on within that species in regards to priority?

Priority being, Where is the risk of disease spread and its significance? And where are the gaps? And try to maybe focus on that.

Because at the end of the day or through the discussions, that might ease some of the concerns about the practicality of putting tags on animals and things that maybe aren't of concern today.

Overall Merit and Merit to Your Species. That's basically what I am seeing. Are there other performance standards that might be considered

appropriate?

We have come up with four. I think, as the working group worked through these, they came up with several more. But when we looked at the ones that were most specific to interstate movement, it was those four that kind of stayed on the chart.

The working group, as we went through each of the species discussions, said, These basic performance standards are really applicable to all the species. Maybe they are applied a little bit differently, but calling the previous state and so forth seemed applicable.

So again, Dr. Roehr also mentioned about, How are these applied now? Are there possibilities of expanding the age classes of animals further down the road? We don't have any proposals, but we are here trying to solicit your feedback on those issues.

So, again, a review of the traceability performance standards. Very simply, an activity that's been defined that an animal health official conducts when there is a trace-back. How much time does it take? That, in combination, makes the traceability performance standards.

At your tables you have this chart as a reference. Probably the chart that helps us explain the

process is the scenario that's on the back side of that chart where an animal is first officially identified in Iowa, moves to Nebraska, to Kansas, and is part of a test exercise or trace-back in Missouri.

Activity No. 1 is the performance standard in which Missouri would contact Iowa. Iowa determines where the animal was identified. Missouri also determines what state the animal left as it came into Missouri. And then Kansas, what location was the animal shipped from.

That's the basics of the performance standards. As you have your discussions -- and you might go in different directions early on -- we really want your feedback on the practicality of these standards.

Is it appropriate that your animal health official, if you were in the state of Missouri, is able to complete Activity No. 1 in that amount of time?

And, if so, what are the solutions that farmers and ranchers and other livestock owners would find appropriate to tag or provide information on interstate movements to achieve these types of traceability and performance standards.

So the work is at your table. We will have individuals trying to help take notes. It's my

understanding that it would be best if one of the participants was willing to give the feedback. After the discussions we are going to have reports back to the group. Right, Deb?

MS. MILLIS: That's right.

So we will be at this work for the next 50 minutes, 5-0. And then we'll come back together as a group and hear back from each group that talks, and those comments from each group will be gathered for the public record by our court reporter.

And, again, if you had any other questions outside of these, you can write them on those question sheets and see that I get them. Thanks.

(Break was taken from 10:43 to 11:41.)

MS. MILLIS: All right. Let's take the opportunity now to hear some of the points that were made at each of the tables. We will be coming around with a microphone and ask that you choose a spokesman from your table to reflect on what the discussion was at your table.

So I think, to begin with, we will start with this table up here. You folks focused on cattle?

SPOKESPERSON: We did. This was a cattle table. There's an awful lot of talking that we did that kept coming back around to the same point, and that is,

in order for this system to begin, we need to begin with the basics and not try to do everything all at once.

The program should direct itself to where the risk actually exists. And so the recommendation here is that we -- that the trace -- that the interstate identification concentrate for the near term on the test-eligible animals until we really have our feet on the ground.

It was mentioned here -- you know, we had kind of a talk and a laugh about the Wright brothers. They got us into the air, but they certainly didn't build the space shuttle. And I think we have to look at it the same way here.

If we get good bookend capability, then we should come back to talk about how to make that more comprehensive.

And I think that -- I don't know if we -- is there more that we need to -- yeah. Another thing, too. Because New Mexico, being somewhat unique in the United States, is one of the brand states.

If there was -- if a New Mexico tag, for example, could be acceptable as an official ID, because it ties itself to a brand, then that would be a great advantage to the producers in New Mexico because the producers themselves could put those tags in, rather

than having an 85 -- what we call the 85 tag, the brite tag, because that requires a veterinarian.

So if there's a way to tie a producer-applied tag besides an 840, outside the 840 system, if there's a way to apply -- for a producer to apply a tag that becomes part of the two-piece combination of identification of origin and the hot brand, which is official ID, then that would be a great step forward, at least in our state.

MS. MILLIS: Neil, can you pass the mike to him.

SPOKESPERSON: From a standpoint of the producers here at this table -- and we had a preponderance of New Mexico perspective here -- but from the standpoint of the producers here at the table, the system, as far as being able to identify test-eligible animals, is certainly doable in New Mexico.

MS. MILLIS: Anything else from your table? We'll go to the table in the back. I think you also focused on cattle?

SPOKESPERSON: I'll try to capture this. In relation specifically to the performance standards, from a federal perspective, these were ultimately probably things, I think, that would be necessary for traceability.

They are achievable, but in the context that they are written, they are achievable in just providing information, not necessarily gathering that information. So, in short, we think we need to add a little more information so there's some continuity and standardization from state to state.

From a producer's perspective, can this information be collected? Absolutely. But I may have to go through completely different systems and processes and paperwork and identification from state to state.

So we appreciate the flexibility, but there's got to be a greater sense of continuity from state to state so that we are not going through multiple systems just to give you this information.

So we had a lot of comments associated with that and how we could go about that, but specifically reading your questions as far as performance standards, we can certainly -- the first bullet -- achieve those. There's probably no gaps at least in information.

Are there other performance standards that need to be considered? I don't know if you'd call them performance standards or not, but at least try to put -- you know, flush out some more detail so we are not doing things differently from state to state.

What animal species should be exempted from

this official identification? I have heard the terminology "test-eligible." And I guess I'd have a question because I think, as we are talking about these in other states, there's this conversation about test-eligible cow versus all cattle that have major movements.

When we talk about test-eligible, is that only reproductive animals? Or is that -- well, let me boil it down. Essentially for us at this table, we believe that feeder cattle ought to be part of the process and they ought to be identified. So however you determine what that should be.

Exclusion. I mean, you have got commuter cattle. You've got cattle that may be moved from state to state. There's going to have to be some more detail on that, I would think.

We believe probably commuter cattle -- most places that they have commuter permits probably don't necessarily justify a significant movement.

So long story short, there needs to be a little bit more detail. Otherwise, I think, we are at the whim and whimsy of state to state.

Related to identification devices -- are we going to get into that a little bit later? I will wait.

MS. MILLIS: Thank you. I appreciate you

speaking for your table. And we will go to this table in the back here, and who is going to speak?

SPOKESPERSON: We addressed a lot of stuff here. And when it gets all narrowed down, it's important what will come out of the end of it.

We need to let industry come together. See what industry could work with amongst themselves. And we will refer back to how COOL came out. The end result was, there was a program that all endorsed, all could live with.

Pointing these questions out, as we came through amongst this table and amongst the other tables as well, industry has to come together here.

So to put it in a real brief summary, let industry come together. Let industry decide what will work for them. And bring that back to the USDA and let it come forward from that point.

MS. MILLIS: When you mention COOL, could you say more about that? People may not all be familiar with that.

SPOKESPERSON: Mandatory Country of Origin Labeling. Industry came together. I think Undersecretary Mr. Knight was involved somewhat in that meeting.

He told the group there, he said what could

come out of that meeting would be pretty much how COOL would come forward, and that's pretty much the way it came.

MS. MILLIS: Is there anything else that anyone else at that table would want to add? Okay. Thank you. And thanks for speaking for your table.

And can we go to the next -- is that a cattle group over there? I want to stay with cattle until we are done with all the cattle comments. Then we will move to the other species.

SPOKESPERSON: Our table had a lot of good discussion as well, but one of the first things, I guess, that came to our mind, similar to the table over in the other corner, was that we feel that, across states and tribes, that we need to have some continuity in the standards that are developed, especially down to what that traceability unit means.

When we start talking about a state being a traceability unit and then also a producer being a traceability unit, I think that's just too diverse of a unit to try to describe.

And so we discussed that, and that kind of goes into evaluating the states as well -- states and tribes -- and their performance of these standards, too.

Because we are going to have to develop --

have that continuity within these standards in order to be able to really truly evaluate and measure how the states and tribes are doing in terms of their traceability initiatives.

And then we talked about, there needs to maybe be an incentive for an RFID-based system. And typically just for faster traceability and more accuracy in traceability as well because we saw some big traceability gaps by using more manual sorts of traceability or ID such as the brite tag.

And then just that needs to go to an electronic-based system, too, in regard to the current gaps as well.

MS. MILLIS: Thank you. Any other comments from your table there? All right. We'll go to this table here. And who is going to speak from this table? Keith?

DR. ROEHR: At our table here we have got two state animal health officials, three accredited veterinarians, and then some animal ID technical people, so that's the perspective of our group.

One of the gaps that we identified was the inconsistent collection of official animal ID devices at slaughter. Some FSI slaughter plants do well at that. Some probably not so well.

So regardless of how effective we are in identifying and tracing cattle, if that information isn't captured at the bookend, final bookend, sometimes the benefit or results will be marginal.

Another gap that we talked about was the -- if a lot of the information is on paper, the ability to assimilate and search through the information may be somewhat limited.

There are piles and piles of documents that may be relevant to certain animal traces, animal disease traces, and if we have greater participation in programs and we can't sort through and use that information electronically, it may be of marginal benefit.

We talked about a gap in transferring information to the certificate of veterinary inspection and then offering education and electronic technology to veterinarians. And we talked about doing that through the accreditation process. It may be of value to veterinarians.

We talked about animal ID devices and that there are some practices of removing official ID for certain types of recreational cattle or feeder cattle that may be problematic. And then also that some cows have a number of official ID devices.

So there's probably some benefit in

correcting some of the problems that exist in our program disease levels right now.

We talked about the performance standards, and I think there was some acknowledgment, just with the four standards, that it may still not give us the disease traceability that we would need to address certain disease issues.

But go back to what the first table said. We acknowledge that we have got to sort somewhere, and these performance standards do measure interstate movements.

So they are probably applicable for where we go, and then how we phase in to the second phase, when we are working at a higher performance standard, a higher percentage, and then perhaps a shorter period of time -- time will have to tell how that happens.

The last thing, the capability for the states. I think there was a feeling that a system could be implemented through USDA similar to other systems to evaluate state capability.

There's systems that work within program disease like the scrapie program, and then there are other systems that USDA does internally to monitor their own area offices that could be implemented.

Any gaps in my report, folks?

Exemptions for cattle. I think the feeling of our group was that feeder cattle would need to be individually identified to have a meaningful system. That a complete exemption of all feeder cattle could have some negative consequences for disease traces for program disease.

That said, there was also an acknowledgment that, if cattle were at slaughter channels and they could be traced back to a state of origin through a tag, that that might be sufficient.

And I think the example of that was, in Colorado we have approved feedlots, and there could be a means by which a group of cattle could go into that lot and be identified and then traceable back to a seller.

That could exempt their need for individual animal ID that would be an official ID.

MS. MILLIS: Any other comments from that table? Keith, pass that back to the table behind you, and we will get to you after we do this cattle table. So we are going to move to the table back here in the corner who also focused on cattle.

SPOKESPERSON: Thank you. There was a lot of discussion in a lot of different areas at this table, and we have producers from Kansas, Texas, Montana, Colorado; had several regulatory officials -- and in

Wyoming; excuse me -- and then had some other people involved with data and IT areas, which made a good cross-section.

There was a lot of discussion on confidence and cooperation from producers. That whoever is doing the regulatory work, whether it's the USDA or the state, producers do not want something rammed down their throat. If they see that, the cooperation level may go way down.

But in light of that, the reality is, we do have disease that needs to be controlled and traced. There's been -- there was a lot of discussion on import/export and what's being done.

And we really want to encourage the USDA to put every single effort they can to keep disease out of the U.S. at our borders. And there was discussion on Argentinian beef. And Arnie was able to give us a lot of insight on some things there.

But with that said, there is apparently some meat that comes in that has things that just aren't acceptable. So we want the USDA to continue to really focus on that.

So I want to get back a little bit more to the -- who is going to be doing the regulatory work of tracing.

And at this table there was -- there's some involvement with the USDA, but there was a lot of discussion on what the states are going to do and how they are going to do it and the accountability that the state officials have, and that producers have a little more access to them to be able to follow up with their particular issues.

And Dr. Heckendorf explained that, with CLSS, which is the system they use in Colorado, that there is a capability to hold that data secure and that the state animal health officials have that. If there's a need to go to another state to get information, that that can be accomplished.

And I think that's a good idea. The producers want their information held accountable in their state and not just have it all over. And I think there was a consensus that people want to see that continued, that the state animal health officials will have that and have control of that.

There was discussion on brand states, and there's several states here that are brand states. The most positive way of ID'ing an animal is if you're not going to lose the metal tag or an RFID tag or plastic tag. Those could get lost.

There was a little discussion -- questions

on different types of cattle slaughter, cattle versus breeding, cattle versus feeding cattle, and how they are going to be ID'd and handled.

One of the producers here said for him, in his operation, when he buys some cattle, he takes the responsibility for the vital security of those and keeping them separate from his other cattle until he's sure they are disease-free.

And if there's a state inspection system that needs to help with that, that he is willing to hold those cattle separate.

And I would agree with him that that's a lot of responsibility for the vital security there. And by doing that, you can help traceability and your state animal health officials if they do need to come and trace.

There was discussion about collection of ID, for it to be thoroughly done at USDA plants. We want to continue to emphasize that and encourage that.

I know there was a gap -- when I was state veterinarian, I know there were some plants that weren't doing that, and it makes it tough when you go and you don't have the ID there that you need.

There was some good discussion by Dr. Gertonson on what is currently being done at some of

the plants. And also some discussion on inspection at the Canadian border, animals coming in, what is happening there and what we need to do to continue to help our trace-back system with animals coming in from other countries.

I guess the overriding thing that I would say here is, there's producers here in our country that are producing meat, producing beef, and they need to stay in business.

We don't want to be in a situation where we aren't self-sufficient in our food supply. And there are a lot of producers that have gone out of business.

Tracing is important to help them stay in business, but I guess we feel like there's -- sometimes there's a push towards a global market with the way the marketing is happening and taking place.

And the emphasis to help our producers through traceability is one way to stay in business so that we have a good food supply. It's a really important thing to all of us as a country and especially people that are making their living from it.

I am a little bit familiar with what is happening here in Colorado. I would encourage our state animal health officials to continue to take the lead there.

And, again, I know there's some cooperation between the USDA and the state and so on, but I think the accountability to the individual producers in each state is sure enhanced by having our state animal health officials have the lead on that.

We think that a lot of these -- the way this program is set up, there's some good goals to try to be able to do that.

I don't think the system is going to necessarily be -- I don't know if it can stay on schedule to this degree -- but to do the very best job we possibly can using the old system with tags and paperwork. And for those that just want to use RFID and that, let them develop that.

The group that said, Let the producers and the industry bring that along, I think is a good idea to help get that accomplished.

MS. MILLIS: Anything that anyone wants to add from that table? All right. We are going to move over here. I think we have heard from all of the cattle groups. And we will go over here to the table that focused on swine.

SPOKESPERSON: I will be the first one to start the afternoon session, I guess.

We did focus on the swine side. We had

industry representatives, a packer processer, regulatory, and a friend from the aquaculture industry.

Our discussion primarily focused around the 5 percent that's outside of the normal production system of the swine industry.

The swine industry supports our swine ID plan, about 95 percent of the industry. That's kind of an integrated system that would work on group lots. Be able to track that from premises of origin all the way through. A few comments with that.

Within our interstate movement we would support a standardized premise system so that a process could verify a premises back. If they have the premises coming to a processor, they have to have the ability to verify that that's a legitimate premises. So that's one of the comments we had.

Also the discussion on some of the standards, it focused around business days versus actual days. If there is a disease trace-back, if there's an index case, we may need to move faster than just through business days. So that might be a place for the working group to discuss.

And then also we discussed the noncompliance and how that would affect either species, how that would affect industries within that group, how a species or a

segment of the state could work out of being noncompliant.

And understand, if you are not noncompliant, it may take three to six months to be compliant again. So not necessarily hamstring the rest of the industry that's working, but develop a system to where those segments can either regain its compliance or work through the system orderly without limiting market access.

Also discussed surveillance, that we do need to utilize this as a surveillance tool through the use -- whatever disease it may be -- and be able to tie that ID to premises as well.

Those are the comments that I came up with. Anything further?

MS. MILLIS: All right. Thank you for speaking for your table. And then our last table, who is going to -- thank you.

SPOKESPERSON: As far as the equine industry, we basically looked at the fact that, since Colorado is a brand state, we can identify horses that way.

However, backyard owners, where they don't move their horses outside of a 75-mile radius, are not going to have a brand inspection. So there is a little

gap there as far as identifying the horses and the potential that people with horses -- big recreation, they're showing, they're hunting, they're trail riding -- so the potential of commingling is a little bit greater.

We talked about health certificates as far as ideally right now we deal with just paper health certificates. Trying to integrate that as far as we can, making it a little bit more electronic and have them in the future as being electronic health certificates. That way it's more efficient as far as traceability goes.

One of the concerns, though, is also the fact that there's a lot of people who aren't going to join the electronic age and be noncompliant as far as getting a computer and maybe doing electronic health certificates, so keeping the paper form as well, being able to scan that in.

We also talked about health certificates as far as a lot of those might be the owner's address but not the address of the animal since a lot of people board their horses. And so that's another gap as far as identifying actually where the horse is located.

Big push as far as education, brand inspections, health certificates.

As far as interstate, getting those within 30 days. Being able to track those down. And also just kind of future as far as the CLSS goes -- time, brand inspections, health certificates, and time at those premises.

MS. MILLIS: Any other comments from your table?

SPOKESPERSON: I just want to build on one thing she said, which was, we sort of kept going back and forth between sort of, what are the gaps intrastate versus interstate, and focusing on whether the USDA should be doing interstate.

And I think, as far as interstate, that the health certificates gave the information needed. The problem is enforcement.

The gap wasn't needing additional regs on CBIs. It was making CBIs actually happen. And that's the interstate level versus -- the bigger question is intrastate.

MS. MILLIS: Thank you very much. I appreciate the fine work that everybody did at their table.

When we come back an hour from now at a quarter after 1:00, we will start in with our small groups once again, and we'll be exploring these

traceability standards even further and kind of seeking your input for what kinds of ways might we be able to establish that we have these capabilities for traceability. So we will say more about that when we come back.

And the hotel, down at the end here of the door to your left, has a restaurant there, and then across the street to the north of us, there's several eating establishments. There's fast food. There's different restaurants all up and down the strip out there.

So we will meet back at a quarter after 1:00. And before we leave, if you have questions on those sheets, let's be sure I have those questions. I will gather those up. Thank you. So the sheets with questions, I would be happy to receive those from you.

(Break was taken from 12:11 to 1:33.)

MS. MILLIS: Welcome back, everyone. I trust that you had a nutritious, filling lunch, and I welcome you back and invite you to sit back with your groups that you started in this morning.

If you prefer to switch to another group, that's fine. And if you want to focus on a different species at this time, that's okay, too. We are pretty flexible here.

So to refresh our minds on what we are going to focus on this afternoon, I am going to ask Neil Hammerschmidt to kind of review what the topic of this next session will be. So I will turn the floor over to you, Neil.

MR. HAMMERSCHMIDT: Okay. Thanks, Deb. Our second topic of discussion is around evaluating tracing capability. The point is, performance standards are of minimal, if any, value if they are not measured. So we are, obviously, committed to making sure we have appropriate and adequate measuring capabilities.

I think part of the discussion can evolve around the relationship or the partnership that the industry and the state animal health officials establish to support the achievement of those standards.

Is Dr. Roehr back yet? I pick on him because he quite often would make reference to scrapie, saying that he did some extra measures or put different policies or practices in place to make sure that Colorado achieved consistent state status.

So I was going to have him share, if he will, his perspective on what type of incentive that was because he will admit, from a Colorado perspective, it did provide to him an incentive to put measures in place to make sure they received consistent state status in

regard to the scrapie program.

So we are looking at ideas that you might have. And I know this gets pretty close to the role of animal health officials, but, again, the states are certainly -- and tribal members of the working group -- likewise are keen on getting your perspective on how some of these issues can be dealt with.

Specifically on your sheet, How could the states and tribes be evaluated against these standards? I think part of our challenge is, we are committed to evaluating them.

I don't know of any states that have a bunch of resources sitting around idle where they could be thrown a bunch of test exercises to go out and conduct because they are not busy enough. So they have to be reliable to make sure we accurately evaluate them, but at the same time, they have to be practical and easy to administer.

How should the results of these evaluations be made public? Do you want the USDA to take out pages in the New York Times or do you just want the USDA or appropriate states to post them on their website so, if people need to see them, they can readily be made available?

What happens when a state and tribe doesn't

meet the performance standards? We have had some good discussions on these, but, again, it's very complicated. We are committed to making sure that we don't jeopardize commerce, but yet, at the same time, there's got to be enough incentives for the states and the industries to achieve these standards.

It might be one of the most difficult tasks we have in that balance of it being an incentive so they are recognized as being a merit to achieve.

And, obviously, along that line, again, with the partnership, How can industry contribute to the states and tribes meeting these performance standards?

So really the second topic follows the first one now that we have kind of the gist of those performance standards.

And I think, in some of our discussions, we have already talked about maybe they are pretty doable by the industry already. And the practices -- I think New Mexico said, Hey, we are already beyond those, or at least supporting the achievement of those. Maybe some other states are not.

So, again, from that perspective, evaluating the standards, industry, state partnerships, and putting practices in place that will support their achievement -- those kind of points of discussion, if

you will.

MS. MILLIS: Thank you, Neil. So we are going to discuss these within our groups once again, based on the questions and other input that you might want to offer.

And this input is invaluable to especially the traceability working group who is working to draft these standards and figure out these things that have been unclear up until now. So they are really here listening to you as you put that together.

So let's go ahead and begin. And at about 2:30 today, we will hear back from all the groups like we did before lunch. And go.

(Break was taken from 1:39 to 2:30.)

MS. MILLIS: Let's come back together as a group, and we will hear a report out from each table. And I think what we are going to do is start with this table back in the corner first. By the time I get there, they will realize that we have resumed, I am pretty sure.

So if we could ask for your table's spokesman, who would that be? Okay. Excellent. Thank you. And what kind of things did you guys come up with?

SPOKESPERSON: Okay. Once again, we had a really lively discussion. And so we will just go bullet

point by bullet point over here and try to recap the conversation.

First, How can states and tribes be evaluated against the standard? And I think what our group -- kind of at all levels suggested that it needs to be equally employed across all states and the industry and at the border. So basically international.

So any tracing of animals would be equally applied. Whatever percentage the standard is would be applied to each industry and each state equally. So nobody gets any -- only have to do a half a percent where somebody has to do 10 percent. The evil packers have to do 10 percent.

The other point on -- what was the other point on -- equally employed, again, and even then there should be a standard. Anything else on that one?

And it would be demonstrated by a percent. So there would be a set percentage that's statistical supported for an epidemiological trace-back. So on a random sample basis. That's exactly right.

The other thing we kind of discussed was that it would be written into the cooperative agreements. So at least at the state level, which was really the question, the state would write that in their cooperative agreements, and it would be evaluated on an

annual basis as cooperative agreements are evaluated and new funding made available.

Point 2, Should they be made public? And there was a unanimous yes. The results should be made public.

And then our suggestion was, it be made public the same way that other statuses -- whether it's brucellosis or TB status for a state -- it would be reported the same way on USDA's website, made available there, by the Code of Federal Regulations.

If the state doesn't receive -- meet its standards -- this is what I wrote down -- we kind of worked around to say they'd receive a status.

So if they don't meet it -- or they meet or don't meet, there would be some level of designation given very similar to what we have for other disease programs right now. So they would be written in the Code of Federal Regulations.

So some level of status written into the rule that designates what the ability to trace is.

And we were just finishing the discussion, kind of, on how the industry would contribute, and somebody suggested going into the state and raising hell if they are not doing it right. So, I think, participation.

So for Question 3, Point 3 is very similar to what brucellosis is right now. If you receive a lower status, that it would be written into the regulations, and the process and time frame to move back up to that higher status. I think that's it.

MS. MILLIS: Any other comments from that table? All right. Thanks, Michael. I appreciate you speaking on behalf of your table. And we will go this next table over here, and who's going to speak for you there? Thank you.

SPOKESPERSON: Do I need to introduce myself? My name is Adam McClung, Arkansas Cattlemens. And we got to visiting around the table to discuss the standards from state to state and the industries involved.

And we spent the majority of our time really discussing the standards from state to state and the actual traceability of the program.

It's a simplistic program. And you throw out the terminology we have all been hearing -- brite tags, bookend, trace-back -- but a true traceability program, what are we trying to do?

As far as this program here, granted, would give states that don't have some traceability an opportunity -- would give them the opportunity to get

complementary with the states that maybe have some programs in place -- TB, brucellosis, things of this nature -- where they are actually tracing some animals backwards now.

But then we get into the standards of the true traceability. What are we trying to do? We think about how FMD operates, the standards with that and true traceability, we are going to have to identify the points of the movement of these cattle.

Moving from that, we kind of got into the discussion of this program here, and any federal program requires appropriations.

With the industries involved, I think everybody in the room would agree that we are going to have to have industry's involvement for the program to actually move forward.

We saw what happened with SENA. The industry didn't buy in. So I think -- and everybody here in the room, I think we are all here today because we agree we need a traceability program.

I think our industry is hindered by organizations like the OIE saying we are not a traceability country.

So with that being said, why don't we take -- as far as getting our industry and our producers

to buy into a program like this, we have programs like this already available.

They're market-driven programs. They are located now. We have PPB. We have QSA. When we take the appropriations that we would use to build a new program -- we are all sitting here today reinventing the wheel.

Why don't we take the appropriations that it would take to create this program, put that into some payment-type incentives for producers into the QSA and PPB programs we already have, and we are done.

That's kind of the standard that we sat here and discussed back and forth, to try to get a true traceability program and a true traceability of movement of cattle. And then to get also the industry to buy in.

And that's kind of where our discussion here at the table -- that's where we -- the direction we went.

MS. MILLIS: Thank you, Adam. I appreciate you speaking for your table. I'm going to go to this group over here. Who's going to -- thank you, Keith.

DR. ROEHR: The first question was, How can states be evaluated against these standards? We discussed that there's internal evaluation structures within the USDA right now that the eastern region and

western region participate in.

And then, again, with the scrapie disease control program where both state -- and I think that was a key point that was brought out -- that the evaluation process include both state as well as USDA partners.

So if the state was being evaluated, they would have not just their own participation, but another state who would understand the state-level issues would participate in that process.

Next question, Should these evaluations be made public? Actually it was our sense that there really isn't a need.

Understand the direction from the administration right now is one of openness and transparency.

I think the producers are going to know very quickly if their states are not compliant. And if they're not, they will be -- part of the repercussions of that will be perhaps increased difficulty in moving livestock.

So I think it's probably more important that industry be brought in during the process so that they can know how a state is performing so it doesn't come as a surprise that there are issues there.

And it probably needs to be a step process.

In other words, not one strike and you are out, but if -- and that leads to the next question. What happens if the state or tribe doesn't meet the performance standards?

Identify the problem, develop a plan for improvement, and perhaps that's where industry comes in. There are issues within the industry, and certainly industries in different states are different. That may make it more difficult.

What works in Colorado may not work in Texas. Since there are some differences in the industry, I think there needs to be a common goal of traceability that's being reached. But if there are things that are hindrances in that, they be brought into that process, and the industry would be involved in that.

Then the last part, How can industry compete or contribute to states and tribes meeting performance standards?

I think it's basically just an education and participation process so that they understand what the performance standards are, how they are met, and then ultimately what place producers and accredited veterinarians play in the process.

MS. MILLIS: Thanks, Keith. I appreciate

that. Anyone from this group? Who's going to speak?

SPOKESPERSON: Some of the stuff that came forward in discussion here would be, is there a measurement in place to monitor what has been gathered -- what some of the industry has already thus far gathered in terms of what we think can come forward?

Look at the traceability performance standards, if you are looking at that from a question. That's premature right now. We don't know what industry is going to have to do, so how would you measure it at this point?

Moving on to the question -- or maybe not even addressing the question here is, What are we really tracking and for what? The discussion that came out of that was for a catastrophic disease outbreak and the prevention thereof.

Concepts to be applied from that standpoint, looking at it from a state-to-state perspective. What if we looked at it from control and traceability by state? That was a discussion that was brought up.

Another point brought forward here was with regards to disease outbreak. With what we have now versus what is being proposed, what do we gain or what are we trying to gain or are we gaining anything with what we are pursuing?

MS. MILLIS: Thank you. I appreciate that. Let's go to this table over here. Thanks.

SPOKESPERSON: We also had a -- mostly had a pretty lively discussion at this table, and we came to whatever different conclusions.

We looked at the question of, How could states and tribes be evaluated against these standards, and we talked a little bit about the development of cooperative agreements and funding for the states so that they could come into compliance and meet these standards.

And the idea of a state developing a work plan and saying, We are going to meet certain objectives and then producing, for purposes of obtaining funding, a listing of those things which they would accomplish -- a measurable event, measurable outcomes -- and this was thought to be at least one good avenue to ensure that the states and tribes are able to be evaluated in the measurable outcomes and work plan that they develop for cooperative agreements.

As far as the question of, How should results of the evaluations be made public, the consensus at this table was pretty emphatic that a lot of these things should really be handled internally and should not be put out for public consumption.

The concern of reducing marketability or reducing salability for the state was considered to be more important than transparency, and we had a pretty lively talk about that.

The idea was that those elements within the state that were out of compliance should be -- should be addressed as individual violators should be encouraged to come along with the program.

And if a number of warnings were unsuccessful, perhaps some punitive measures such as fines could be incorporated. But the group at this table was against wholesale publication of not meeting the standards.

The idea of reduced funding was brought up, and we talked a little bit about using cooperative money, using the $14 million as -- more the states' portion of $14 million as either a reward for excellent performance or as a punitive measure for states which were failing to go along with the program.

And we talked just briefly about the paradox there, that the state that was performing poorly would receive less money and how are they going to increase their performance and get up to speed if the funds were being choked back. And I guess that's a constant philosophical problem that we run into.

Another thing that was brought up in terms of meeting -- states that don't meet their requirements was maybe regionalization within the state. If there is an area that's out of compliance or not meeting the standard and the rest of the state is okay, to effect some sort of interstate regionalization of the area that's not meeting the standards.

How could industry contribute to states and tribes? Excuse me. How could industry contribute to states and tribes meeting these performance standards?

It was pretty much agreed that we need industry's buy-in and industry's support. As far as doing anything towards punitive measures or disciplinary actions to a group that is not meeting the standards, the group felt that this was USDA's responsibility and not the job of industry to lay out these types of requirements or lay out guidelines along this.

And that's about it from our report.

MS. MILLIS: Thank you, Roger. I appreciate you reporting out from your table. We are going to go over to the table towards the front there.

MR. HAMMERSCHMIDT: The delegation from New Mexico had to catch a flight, so some quick comments on behalf of the group here will be brief so I don't duplicate other comments.

But I think the overall discussion was yes, the performance measures do need to be evaluated and documented, but keep it simple. Concern about lack of resources, lack of funds, that they probably can't, again, take on a whole lot more work to go do test exercises.

So document what is necessary to reflect one's capability. Certainly use actual investigations to the degree possible.

There is support for a public listing. Maybe having more information available to state animal health officials so they can obtain more detail on another state if they so desire.

Preference to some degree to have a tiering process so you are not either good or bad, but maybe three or more levels to reflect where a state might be in regards to tracing capability with some sense that that would provide an incentive to improve if they saw the next tier going down to the bottom or further in that direction. So that, they thought, would be more attractive.

In regards to the consequences, there's a sense, I think, among this group that it would be self-managed. That maybe the USDA really doesn't need to get involved or provide a whole lot of specific

actions.

In that regard, that other states would most likely impose other requirements that could be more complicated to meet than if a state was at the higher level.

So maybe it was more a reaction from other states that would automatically be put in place and may not be a big deal for USDA to have to govern those types of actions. Other questions or comments?

MS. MILLIS: Thank you. That input is very helpful. That's all information that the traceability working group can use as they go forward.

Now for the third session, we are not going to break out in small groups. We will do it in the whole room here.

And, Neil, I am going to ask you to step up to that microphone so that we can be moving around the room in case there's other questions that people have.

But we gathered up your questions before. Neil is going to address the ones you have -- or that you had earlier. And if there's other questions that come up for you, you will have an opportunity to ask those as well?

MR. HAMMERSCHMIDT: Thanks, Deb. I'm just going to page through some of these in regards to how

they kind of fit together. Some questions that -- I will be the first to admit -- I think are simple because we don't have the answer.

"How long might feeder cattle be exempt? Forever or for a certain number of years? Undetermined?" That's some of the feedback we are hoping to get through these public meetings.

"Will there be a requirement to record or report all official IDs at harvest?" There's certainly interest in doing a better job at that, but, again, no decision has been made.

"Will all individual official ID be required on ICBIs for all nonexempt cattle?" Again, still a point of discussion. There's a sense that maybe having some classes just carrying an official tag is adequate, not requiring them to be listed on every certificate.

But, again, still points of discussion and certainly important ones that we need to continue to solicit feedback on.

"How are the goals and performance standards developed? Specifically were there any epidemiological analysis of what the problems and needs are?"

I am going to maybe bounce this off some of the other working group members that might have perspectives on this. Was there a specific analysis

done specifically for this working group?

I don't believe so, but there's other reference documents -- Dr. Morris, Dr. Roehr, others -- that might want to comment on that specific type question. Again, the question is, Specifically was there any epidemiological analysis of what the problems and needs are?

DR. MORRIS: Thanks, Neil. As many of you know, following the conclusion of many of the disease investigations, there is a final epidemiological report for those particular diseases.

Indeed we do have one that's on the website relative to the BSE case in Washington -- similarly for the state of Texas; similarly for the state of Alabama -- for the three BSE disease investigations that were performed.

Also there's in excess of a 200-page document provided by a third party relative to the Exotic Newcastle Disease epidemiological report and conclusions from the process arising and issues associated with that particular disease outbreak.

So, Dr. Myers, if you know of any additional documentation associated with sunrising those data, those do provide the basis for many of the epidemiological assessments associated with the conduct

of those disease investigations.

DR. ROEHR: The only other comment I have is just the number of traces that we were not able to complete or passed off basically as a soft trace.

Knowing that -- we couldn't trace back to the birthplace. We could trace to the feeding operation. It made no sense to test a group of cattle that cycle in and out. It really wouldn't give us any information.

So I think it was just the knowledge that we have in our existing disease programs that we don't always find the animals that we are looking for.

In the Texas dairy, the Tapia dairy, that had all the trace-outs to different states, we found a majority of those that went -- or a majority of those that actually had gone to slaughter by the time we went into the dairies that those heifers were imported into.

We also had some of those heifers that were sold to traders, and they didn't have records that were adequate to see where those dairy heifers were sold to, either outside the state or within the state. So basically, again, just some soft traces that we were not able to follow through on.

MR. HAMMERSCHMIDT: Very good. Another question: "Are the items in the standards column,

referring to the chart -- i.e., 95 percent within one business day -- the type of requirements or in this case, I think, the traceability standards that will be proposed in 9 CFR?"

As soon as the regulation for traceability comes down the pike, there will be requirements defined. Based on the recommendation of how we construct the regulation, I think there's support intentions to publish the overarching intent of the regulation in the CFR.

And the CFR would actually reference, if you will, a supplemental document. Whether that's called traceability performance standards or whatever that title might be, the actual substance of that chart would be external to the CFR itself.

That allows enhancements to the traceability standards to be made more timely, and that's certainly some of the preferences being considered as well.

"If the USDA is only planning to regulate interstate movements, why are the standards proposed for intrastate movements, specifically Standards 2 and 4? The vagueness of the term 'traceability unit' provides flexibility but setting a standard on an undefined term skews the process.

"States need to be able to evaluate

interstate traceability needs on both different species and different diseases. Setting a federal performance standard for intrastate traceability does not allow that."

Again, I will have other members of the working group comment, but I do know for a fact that, as the working group went through defining actions they'd take in regards to trace-back events, there was -- I forget how many measures that were on the initial chart.

And as they went through, the ones that were not specific to interstate movements were removed to align with the framework that we're following.

Others specific to 2 and 4, 2 really talks about the -- for the state to determine the traceability unit of that animal. Four is basically the same, but it could be a state that shipped the animal to the current state.

My interpretation was that those aren't really tracing an animal back to a state, and the state then has the -- not the authority -- but the responsibility of tracing that animal within their state to the traceability unit they so desire based on their plan.

Keith.

DR. ROEHR: Neil, I think that's what we do

presently in that tracing it back to merely to the state and then saying, We have satisfied the requirement -- ultimately we want to get to a source herd to do testing.

And then, if we know what that herd is, we will do trace-ins and trace-outs. We want to find all exposed animals and all fence line contact. We do that presently anytime we have a positive TB case.

So while those won't be built in to these performance standards, because these are only relative to interstate movement, they are still an important part of disease tracing and epidemiology.

Whether there are performance standards or not, when we hit real live program disease issues, we are required to do those things because the program disease, CFR and UM&R, tell us what we are required to do. It's just prudent due diligence in disease control.

MR. HAMMERSCHMIDT: There were some other questions that I will try to group together in regards to identification tags.

Again, part of it goes back to interest by some states to differentiate. When you talk about the silver tag or the brite tag with the nine-character number format on it, there's interest by some states to have the version of that number with the alpha

characters reserved for disease programs administered through an accredited veterinarian or the alpha -- or the number that's leading with the digits actually reserved for those programs.

And maybe the alpha characters are the version, if you will, that could be distributed direct to a producer, i.e., not through an accredited veterinarian.

Preliminary discussion. Again, no decision has been made, but I think the key in this regard is, if we are wanting that option, that we probably need to consider identifying or defining both numbering system formats in the CFR, or making it either one of those formats, and give that prerogative to the state who is responsible for the administration of those tags, giving them the option to do with that as they see fit.

Another tag question. "Will existing RFID tags be grandfathered into official ID?" Again, I am not exactly sure the interpretation of "grandfathered" in as official ID. Today our official identification numbers are defined in the Code of Federal Regulation.

Most commonly the 15-digit number is the format that's encoded in the electronic transponders.

We have the option today for a manufactured coded tag to be the number encoded in the transponder or

the same format prefixed with 840. By the Code of Federal Regulation today, both of those numbering formats are considered official.

So really there's no grandfathering, per se, because they are both recognized as official today.

"If states with tribes -- if states have tribes -- reservations within their geographic area, who will be the final authority over identification and traceability?"

Again, others here that are closer to that area of responsibility might wish to comment. It would be my understanding that that decision is made at the local level between the state and the tribe. Other points or corrections on that?

"Will the USDA continue to utilize the current NAIS premises registration system? Specifically the numbers."

The premises number allocator, location identification allocator is still being made available to the states that wish to use that numbering system to have those numbers allocated to their location. So it's certainly an option for the states and tribes to utilize if they so desire.

"Who will be responsible for distributing tags to producers and keeping the records?" I think

it's a good point to clarify that yes, we do need to keep distribution records. That's probably the fundamental part of traceability.

In regards to official identification devices, when we look at the nine-character number on the silver tags, those are administered through the states.

They can utilize their own tools for recording the distribution of those numbers however they associate the numbers to the appropriate person or location that obtained those tags. That's certainly their call.

The next question is in regards to, "Has anyone determined how much more at risk are cattle that live longer?"

Again -- if there's any clear answer on that. I think there's a lot of understanding or appreciation for cattle that live longer, possibly move to more areas that are managed. And have the opportunity to commingle more with other cattle and move again are more subject to disease risk.

From the animal health officials, any additional point you would like to make in regards to the question, "Has anyone determined how much more at risk are cattle that live longer?" Probably in

comparison to feeder cattle.

"Why has there not been an inspection to reject or accept foreign livestock?" And it makes reference to -- I can't read the writing; I apologize -- "How do we get -- from Mexico and BSE from Canada?"

So really the question is, probably in our border inspection processes, what measures are in place to accept or reject livestock coming in from Canada and Mexico? T.J.?

DR. MYERS: We do have both identification and testing requirements -- if we're talking about Mexico and TB -- for cattle entering the U.S.

Under the trade agreements that we have and that Congress has approved, we have to take a managed-risk approach to imports, particularly with diseases that we already have in the U.S.

So we do take that managed-risk approach by requiring testing and identification. We have looked at the Mexico system for TB and evaluated their state test. We evaluate ours in the system that we have that defines modified, accredited, et cetera, et cetera.

So we do hold them to those standards, as we hold our own states. The question is whether or not the mitigations that we have in place are adequate. And I think everyone has heard the statistic that about

two-thirds of the TB cases we have identified in the U.S. can be traceable to Mexico.

But that means one-third of them are not. So we have to recognize that -- is that a question of how much do we have here that's endemic TB in the U.S?

So it is a managed-risk type of approach that we need to take. If you look at the concept paper that we put out last fall regarding TB, we do ask the question, Are our mitigations adequate for imported animals?

And I think a lot of folks would say they probably aren't, and we are looking for ideas that would help us manage those risks better.

So some of the ideas that have been thrown out through that TB concept paper process are, do we need dedicated feedlots and noncommingling or security requirements to be put in place to try and manage and mitigate that risk even further?

So we do recognize that that is an issue and a concern, and we have not let that fall off our radar screen. We are working on that issue.

MR. HAMMERSCHMIDT: Thanks, T.J.

Maybe I will jump down to the fourth question on this sheet. "Has there been a documented problem with domestic born and raised feeder cattle?"

Again, animal health officials, maybe at the state level, ABICs? Your experiences based on actual investigations in regards to the question, "Has there been a documented problem with domestic born and raised feeder cattle?" And I am sure it's in regards to animal-disease-related issues.

I know there is discussion about them being exempt from the traceability framework. We heard today some variances of opinion.

And maybe the question is around that as far as documentation on to what level animal diseases have been detected in that particular population. Brad? Keith? Any comments from your perspective.

DR. ROEHR: I think certainly with tuberculosis, the test-eligible age requirement for dairy cattle is as young as two months of age.

And yeah, I guess the question is, do we see TB in feeder cattle? The answer is yes, we do.

Because it's a chronic, slow, progressive disease in most cases, there's a greater concern perhaps with breeding cattle than cattle that live longer.

I think it goes back to your question previously, Neil, about, is there a higher risk? Yeah, just because of the nature of some diseases, the longer they live, the more they are apt to express those

diseases.

But feeder cattle in the United States that are fed and commingled with other groups, particularly inbred cattle are at risk.

And there is some thought -- and I have talked to Bob Meyer, our TB epidemiologist about this before -- his concern is that some of the TB responding cattle that are inbred in origin may never make it to slaughter. They may die in a sick pen in a feedlot, but the other exposed cattle may go on to slaughter and be discovered as lesioned cattle.

So I guess yes. To answer your question, yes, there is some risk of disease in feeder cattle.

The other point I would make, too, is that, when cattle -- when calves are harvested and sold at the fall run, most of those probably do go into feeder channels.

Although some, depending on the market, the availability of grass, cost of feed, some of those heifers will certainly be retained as breeding heifers in a herd. And if they are not ID'd when they leave the state of origin, they become cattle in the state of destination.

And I know Colorado, our producers have an interest because we do receive -- we feed more cattle

for Wyoming than any other state. We also receive a lot of cattle from Montana and Idaho.

And certainly some of those feeder cattle, feeder heifers enter our breeding herd each year. If they are vaccinated with an 84-year tag, they become Colorado cattle for the rest of their life.

And I guess another point is, with feeder cattle, certainly new and emerging diseases or foreign animal diseases that may not be chronic, slow, and progressive are certainly a concern.

I know it's been the direction from the industry to concentrate on existing program disease because we understand how those programs work, but I think, too, there is some benefit in designing traceability programs that may have application for new and emerging or foreign animal diseases as well.

MR. HAMMERSCHMIDT: Okay. Very good.

A question in regards to premises ID. "Why the possible use of prem ID when custodial, in quotes, is more immediately accurate as to the location of the animal?"

So I think the question is, the possibility of using reference to the person that is responsible for the animals possibly being more important than the premises identification number.

And I don't know, again, if any of the animal health officials would like to take reference to that.

I mean, a lot of it has to do with trying to help identify animals that were at the same location at a certain point in time to help reflect or determine animals commingled with one another regardless of ownership or who might have been responsible for those animals at a certain point in time.

But early on I know the discussions were more looking at where the animals are located to determine commingling, realizing that maybe the ownership is a good point of contact when the animal health official needs to call that person.

But certainly, when we are looking at animals commingled, knowing what animals were at a certain location is very important.

As we look at traceability systems in other countries -- and there's pros and cons there, but we are always asked if we look at those systems in other countries -- what can we learn? What is applicable here?

Actually, when Canada started their program, for example, two representatives from the same farm or ranch could go into the farm supply store and buy tags

back to back or six months apart, and they would give their personal identifications number when they bought those tags for recording the distribution of those tags.

As they went further ahead, they realized that that was a little bit of a shortfall in their system because those two locations were not tied together. They looked like they were two different entities in themselves.

So actually they instituted a location identification system as well to help connect the location to achieve commingling for cattle that might be under two different ownerships, two individuals responsible for different cattle at the same location.

So there's some of that from my perspective, but, again, ABICs? Epidemiologists that are here? Bret?

MR. MARSH: I will just offer a personal experience with premises. I am from Indiana, and we had a premises registration requirement that's been in place for several years now.

We had a TB trace to a southeast Indiana cattle herd a year and a half or so ago. And I could sit at my desk in Indianapolis and I could identify within 3, 6, 10, 20 miles of that site how many cattle farms were affected. Just that fast.

Then I could notify them if I needed to stop movement -- if they were going to take cattle for sale, if they were going to take cattle to exhibition -- we knew immediately who we needed to notify right away. It was the first time we have ever been able to do that.

I spent several years -- of course, being from the Midwest -- working a lot with the swine industry. And a true story -- and maybe some of you have heard me tell this story -- I was working in the pseudorabies eradication program for swine.

With pseudorabies, I used to get a positive report from a diagnostic laboratory. And we used to get out a plat book, and we'd take a standard tuna can and put the center of that tuna can on the infected site and draw a circle around the outside of that can, a 2-mile circle.

I used a copy of that map and sent it to the field and had our district veterinarians go find everybody door to door who had hogs.

Well, we would be doing similar things with cattle. And at least our sense is, you just don't have that much time. We don't have the resources we used to have to put on the road.

And, particularly, I think that's one of the comments we have had at our table is, as you move to a

notion under the 2015, US 2015, as you are moving to a brucellosis-free country -- and less traceability, we hope, on tuberculosis -- you lose your state infrastructures. So you have to find ways to be more efficient in your ability to trace.

And the only way to do that is adopting some of the advancements that are available today. We did paper for decades because paper is all you had.

You'd write certificates. You would send them to the state office where you practiced, and they would evaluate them and forward them on to the next state where the cattle went, for example. In our analysis and our data in our state, it can take four to six weeks to get that.

And that's why we have had permit numbers all these years because I knew by permit number they were coming long before the paper ever got there.

And our cattle industry is asking the question, How much risk should we assume while we are waiting for the documents to get there?

And so we are looking at ways to try and incentivize practitioners and producers to utilize the available technology so that we can be more efficient in our process.

So we had this experience with premises.

And, I guess, the question is, which is better, premises numbers or farm names or owner names? I guess it's all of that.

The notion is that, if I cut a 6-mile circle and you have cattle in that 6-mile circle, but you are registered as an owner in a 10-mile area, I have missed you. I won't find your cattle until we finally go door to door to find cattle on a pasture lot or something inside the 6-mile circle. If you have your name registered in 10 miles, I will miss you on the circle.

So we said, Register as many as you like. I have one guy that he rents 19 different tracts to run cows on. That's all right. They're free. It doesn't cost you to get a number, but I don't want to miss you if we draw those circles. That why the more information, the better.

MR. HAMMERSCHMIDT: Also a comment that I will share. I think it's a comment.

"Clearly USDA is sold on electronic ID, which does not solve the human" -- and I can't read that word -- "problem."

I'll just make a point of clarification that certainly the framework is committed to as shared or provided to us from Secretary Vilsack to work with lower-cost technology.

Dr. Clifford has frequently commented, the value of getting the most basic ear tag, a 7-cent metal clip ear tag into cattle, for example, is still providing the greatest void in animal ID.

So certainly I do want to share -- reinforce the comment, the USDA perspective, that we are committed to the lower-cost technology that certainly has proven workable in disease programs in the past.

Having said that, I think Dr. Breitmeyer's presentation and others that have dealt with TB will share their perspective that, in certain disease situations, other types of identification -- automatic data capture where we are working cattle twice for TB testing -- can improve the accuracy, improve the efficiency, being of less interruption to the producers is appropriate.

So certainly, for TB testing, the USDA is also submitting -- or committed to the degree possible the use of radio frequency tags. Because it's a win-win situation for the producers involved, as well as the animal health officials conducting those tests.

But for the basic framework that we're dealing with here to give us that first bookend for the appropriate population, certainly the basis is at least a metal tag.

Again, as Dr. Myers indicated in his presentation, if producers find value in RFID for their own management purposes or other incentives, whatever it is, we don't want to discourage them. We want to make sure they're accountable and workable in the system from that perspective.

Another question. "Have the cattle ID principles been considered in bringing forward a disease traceability program that's brought forward by the cattle ID group?"

Definitely. Certainly the USDA, Dr. Clifford, the Undersecretary, the Secretary have reviewed those principles. We have made those available and shared them with the regulation working group.

We are very pleased to see that that many organizations within the cattle industry could come together and agree on those principles.

And, again, from where I sit, I think some of the basis of what you see in the framework aligns very well with the basic principles that the cattle ID working group has brought forward.

So those are the types of recommendations that the states, the USDA, and certainly the working group value very much and appreciate those being shared, especially when they come from a significant

cross-section of the industry.

On another report, maybe a couple comments. "The system as presented will cause a major problem at the markets. As to interstate shipment, we will have to tell out-of-state buyers if they can or cannot bid on different groups of cattle."

And I know there's been a lot of discussions about those concerns. I share the comment because I know there's been discussions on how to resolve the movement of cattle through markets so it doesn't impede interstate commerce and those kinds of things.

Also a comment from the same individual, "Commuter and direct to packer creates loopholes that will need to be closed later. These two groups are also likely to have disease problems that will also need trace-back."

Some other questions. "Will USDA promise to remove itself from mandating ID?" I think that's a valid question. Let's look at the framework. Let's look at the current regulations. Look at the current disease programs.

I think it would be impossible for the USDA to commit to no requirements for official ID because they currently exist. They are throughout the regulations for disease programs. They are in the

interstate movement section for cattle and swine.

And, again, as T.J. went through his slides this morning, the intent of this regulation is to require certain populations of livestock that move in interstate commerce to have official identification.

So those requirements are certainly part of the new regulation as well. And maybe the question is to, more generally, the mandating of all animals, period.

And I think you can see from this framework, the focus of the ID requirement is on animals that move interstate with the understanding that, even then, there's appropriate exemptions to consider. As was mentioned earlier today, cattle moving direct to slaughter might be an appropriate exemption.

"Will the USDA promise to stop mandating the purchase of ID?" Hopefully I have covered that already.

"Will the USDA commit less than 48-hour delivery of vaccine?" Again, I am not sure the intent of that question.

DR. ROEHR: Probably FMD. Foot-and-mouth vaccine is maybe what they are referring to.

MR. HAMMERSCHMIDT: Any follow-up comment or clarification?

DR. ROEHR: 48-hour delivery of the

foot-and-mouth vaccine is probably not realistic. I think, in previous discussions, probably more like a week.

It depends on the outbreak and it depends on the situation. But the reality is, we are in the North American Vaccine Bank, and we share access to that product with Mexico and Canada. That's how it's set up.

It's deliverable through the National Veterinary Stockpile. It's easy to request. The state animal health official and an ABIC can request it.

Obviously, with foot-and-mouth vaccine, that would have to be approved by the Veterinary Services directors and John Clifford. There are export and marketing questions that would go out if we choose to vaccinate for that disease.

I think it's a cumbersome process by its very nature, the disease. I think, as state animal health officials, we absolutely understand the vaccination may be a very important disease prevention tool in the event of an outbreak of foot and mouth.

MR. HAMMERSCHMIDT: Thanks, Keith. I appreciate the clarification.

"Will the USDA commit to removing mandates of premises ID on 4-H and FFA livestock shows?" Our point of clarification would be that the USDA has never

mandated premises ID on 4-H or FFA livestock shows.

"Will the USDA enforce ID at all borders through inspections of animals?" Again, official ID is a requirement for cattle or livestock coming into this country. There are border inspections that do examine those animals being officially identified as they are required.

"Will USDA control disease in feral herds?" Again, probably a question or a comment that's been discussed in different portions of the swine industry. I certainly don't have the answer. Others -- if any individual would like to comment, the floor is yours.

"Will USDA commit to no national database allowing states to control state information?" Certainly from the disease framework perspective, it's been made clear that the information acquired through these efforts are at the discretion of the states.

I think it is also appropriate to clarify that disease program databases have existed for 30-plus years, and those types of databases certainly continue to be made by APHIS Veterinary Services in their areas of official disease programs.

Certainly I think the discussion has evolved in regards to the information to support the new traceability framework. The states have the prerogative

of having that information maintained locally. At the same time, they can keep their information at the information technology centers that the USDA does host in Kansas City and Beltsville, Maryland.

Some states prefer to utilize those solutions. It's the equivalent of having their own; only it's managed by these technology centers in two different parts of the country -- at their direction and they're access controlled and those kinds of things -- but the bottom line is, no single massive centralized database to support this framework document.

Deb, I think I have covered the questions. Possibly there are others that you want to see if --

MS. MILLIS: We want to open the floor in case there's a question that you may have had for Neil or anyone from USDA here that might answer that.

So are there any other questions that you might have? And if you wave us down, let us get a microphone to you so we can hear what you are asking.

AUDIENCE MEMBER: Everything that you have stated here's been for the state and the tribes. How many tribal groups are here?

Just with our livestock option, we deal with six different tribes, but I don't see none that would be educated on this, other than the livestock option being

the one that educates them on it.

MR. HAMMERSCHMIDT: Again, others, T.J., might want to comment. There are tribes that the USDA works with on these types of programs. There are members that have regularly participated in the working group discussions.

We have resources that really reach out to the tribes through other organizations that represent some of the tribal nations and things like that, but there is ongoing dialogue with the tribal nations on this issue.

AUDIENCE MEMBER: One of them you have on the Navajo nation. Yet there's never been anything written where they can read it. There's a lot of older people that don't speak English, don't read English.

When your regulations come up, they come up and they say -- they think it's a shot they've got to give.

They say they had 10, 12 deals like this, but I ask every one and none of them's ever been to one. That's why I was wondering, how are you going to get the word out, other than it coming from -- directly from us when the cattle come in or out, one or the other?

MR. HAMMERSCHMIDT: Again, that's certainly acknowledged, other references, but the USDA does

certainly provide a lot of resources and certainly a lot of time and energy working with tribal organizations with resources to have similar meetings with the idea that those representatives participating in those meetings take that information back home.

I am certain we can do a better job in that area, but certainly strong efforts to consult with the tribal nations as well.

DR. ROEHR: I would just concur with everything that Neil said, but I would also add, we do have a veterinarian on staff, Dr. Terry Clark, who is our tribal liaison.

And 100 percent of his time is devoted to tribal outreach. So he does a lot of work with the tribes in getting information, particularly about traceability, to them. So we do put a fair amount of effort into that.

AUDIENCE MEMBER: On a somewhat similar vein, a lot of the discussion at our table focused on -- we were talking about things besides animal traceability that affect animal health -- questions about vaccination, for instance, and imports -- and in February there was talk of the advisory committee and the fact it was changing from animal traceability to animal health, which we took as recognition that animal

traceability is just one aspect of animal health.

And what I have seen at this meeting so far is, what's coming out of the regulatory working group is really focused just on the traceability piece.

And so I am wondering how this is going to function. When is the advisory committee going to be formed? These are good meetings. I appreciate you-all doing them, but it's not a substitute for having a working committee that can bring in the issues of how do we work -- the full picture of animal health.

And if that's only going to come up after this is already three-quarters done, we have got a lot of concern about that.

DR. MYERS: The former Secretarial advisory committee, which was focused primarily on foreign animal diseases, has been renamed, as I mentioned earlier, to the animal health group.

There is a process, a regulatory process, for putting such a Secretarial advisory committee in place, and so that is being pursued. We hope to have that committee in place late summer or early fall.

And then it would have not only that broader animal health charge, but then also it would have the options for subcommittees such as a traceability subcommittee, an aquaculture subcommittee, whatever

subcommittees might be appropriate.

So that process is moving through the regular process that is required to call for nominations to that committee and to identify folks to serve on it.

However, the other thing that I want to mention is that the regulatory working group that we've been talking about that Keith Roehr represents, that is up and functioning. That is focused on traceability; you are correct.

But that is a state federal tribal group that has that broader animal health charge in mind as well because that's the underpinning for traceability. It's designed to assist us in better controlling animal diseases.

AUDIENCE MEMBER: I do understand that there's a regulatory process for these working groups, but have we missed that there's been a call for nominations? We haven't even seen that portion of it. That's part of what is worrying us.

DR. MYERS: That has not been published yet. I don't know what the date of publication will be, but, again, our target is to have that call for nomination, have folks nominated and selected by the Secretary by this fall.

MS. MILLIS: Are there other questions?

AUDIENCE MEMBER: I am kind of curious. I talked to Dave a little bit about this $14 million, and he kind of explained it to me that it goes -- a certain amount goes to the states. I would like to know how we are going to determine what state gets what and what it's used for.

DR. MORRIS: The answer to that, Wayne, is, the initial allocation was based upon livestock numbers, the various issues within each state, as well as apportionments associated with the number of livestock markets and in a formula based upon those primary NAIS data and criteria.

Proportionately those resources were allocated on a state-by-state basis. For the most part, livestock numbers, livestock markets, and also harvest and slaughter facilities presently in those states are used to determine the relationship apportionments among the various states.

In addition to that, some states are minimal in terms of their resources in that regard. So we established a baseline for some of those states as well.

Similarly, for tribes, we have established $10,000 per tribe that's interested and willing to participate. Those are the dollars in terms of how that was apportioned and created.

AUDIENCE MEMBER: To be used for what? What do the tribes do with it?

MS. MILLIS: So the question was, To be used for what?

DR. MORRIS: To assess the resources that are available, to develop outreach programs, and to also -- depending upon their stage in identifying their locations, their approach to traceability within that state -- and more resources to support implementation strategies as they would devise and create within that potential.

AUDIENCE MEMBER: Education basically?

DR. MORRIS: For the most part. Then we have to recognize that $10,000 is a very minimal amount when we look at trying to staff as well as divide outreach.

There's so much variation within the tribes that it's difficult to say, on average, what they would do, but you are correct, the predominant portion would be outreach.

There are some tribes that would engage in value-added programs to promote implementation of official ID and those kinds of things, but there's great variation.

MS. MILLIS: So I want to, before we close

today, make a couple of announcements.

One of the questions that's come up at some of these meetings is, how did people find out about it. And actually APHIS USDA has a list, and that's e-mailed out to people.

So if you want to be a part of that and you want to get announcements about things such as this meeting, be sure that we get your e-mail address. And there are folks making a list out in the hallway.

So if we don't have that and you want to be on it, you are welcome to be on it.

The second thing is that we are also hosting another public forum with industry and other stakeholders in Dallas, Texas, on July 1. So it will be a meeting similar to this.

And Dr. Hanstead, you had a comment or question?

DR. HANSTEAD: The table was curious. Is there a point of contact or an open comment period where they can send in written comments now to some record?

DR. MYERS: There should be on your table -- and if not on your table, out at the front desk -- the Federal Register notice that came with this meeting -- or that announced this meeting, and it lists on there the site for submitting written comments.

MS. MILLIS: Thank you. Any other final questions?

Then let me take the opportunity to thank you for your participation today and turn the floor back to Dr. Myers.

DR. MYERS: Just in closing, as I said at the beginning of the meeting, today was all about collaboration, and I think that was achieved today.

I really appreciate all of the good comments that we heard. It's all going to be very useful information for us as we move forward. And, again, thank you for taking time out of your busy day to be here with us and safe travels home.

(WHEREUPON, the meeting concluded at 3:43 p.m.)

STATE OF COLORADO)

) SS. REPORTER'S CERTIFICATE

COUNTY OF DENVER)

I, Denise A. Freeman, do hereby certify that I am a Registered Professional Reporter and Notary Public within the state of Colorado.

I further certify that this meeting was taken in shorthand by me at the time and place herein set forth and was thereafter reduced to typewritten form, and that the foregoing constitutes a true and correct transcript.

In witness whereof, I have affixed my signature this 24th day of May, 2010.

_____

PATTERSON REPORTING & VIDEO
Denise A. Freeman
Registered Professional Reporter
and Notary Public

PATTERSON REPORTING & VIDEO
Highpoint
2170 South Parker Road, Suite 263
Denver, Colorado 80231

May 24, 2010

MS. MILDRED BUNDY
4700 River Road
Riverdale, MD 20737

Caption: Animal Disease Traceability
Public Industry Forum
Monday, May 17, 2010, Denver, Colorado

Dear Ms. Bundy:

Enclosed is the transcript of the above-referenced meeting:

_____ Previously filed. Forwarding signature page and amendment sheet(s).

_____ Signed, no changes.

_____ Signed, with changes, copy of which is enclosed.

__X_ No signature required.

_____ Signature waived.

_____ Forwarding original transcript unsigned; signature page and/or amendments will be forwarded, if received.

_____ Original exhibits included in ongoing notebook and will be filed with counsel at conclusion of discovery.

Enclosures: (As above noted)