

# Animal Disease Traceability

## Summary of Program Reviews and Proposed Directions from State-Federal Working Group

April 2018

This report provides an overview of the Animal Disease Traceability (ADT) Program review, a summary of stakeholder feedback received during listening sessions in 2017, and the preliminary recommendations of the State-Federal Animal Disease Traceability Working Group.

USDA does not necessarily endorse the recommendations included in this report. USDA will continue to review and explore opportunities and recommendations to improve the current ADT Program and enhance animal disease traceability.



United States Department of Agriculture  
Animal and Plant Health Inspection Service  
Veterinary Services



# Animal Disease Traceability

## Summary of Program Reviews and Preliminary “Next Step” Proposals

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# Preface

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This report provides a brief overview of the ADT framework and summarizes the reports prepared and the reviews conducted to evaluate its overall impact on animal disease traceability. Feedback obtained from industry stakeholders, and State and Federal animal health officials during extensive outreach efforts in 2017 provides details on the progress of ADT, successes, and challenges or problematic areas of the initial framework.

A State and Federal working group with substantial experience and knowledge of animal disease traceability comprehensively reviewed stakeholder feedback and prepared the preliminary proposals contained in this report. Members of the working group presented a preliminary draft of these proposals at the Traceability Forum hosted by the National Institute for Animal Agriculture (NIAA) and the United States Animal Health Association (USAHA) in Denver, Colorado on September 26 and 27, 2017.

# Introduction and ADT Program Description

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## Background

The U.S. Department of Agriculture (USDA) provides various programs that support the economic viability of animal agriculture. The Veterinary Services (VS) unit of the USDA's Animal and Plant Health Inspection Service (APHIS) works to improve the health, productivity, and quality of life for animals and people by maintaining and promoting the safety and availability of animals, animal products, and veterinary biologics.

Animal disease traceability- or knowing the whereabouts of diseased and at-risk animals are, where they have been, and when – is important to ensuring a rapid response when animal disease events take place. Although animal disease traceability does not prevent disease, an efficient and accurate traceability system reduces the number of animals and response time involved in a disease investigation, which, in turn, reduces the economic impact on owners and affected communities.

## ADT Focus

The current approach to traceability in the United States is the result of significant discussion and compromise. Federal policy regarding traceability has been amended several times over the past decade based on stakeholder feedback, particularly from the cattle industry. In early 2010, USDA announced a new approach for responding to and controlling animal diseases, referred to as the ADT framework. Key principles of the 2010 framework include:

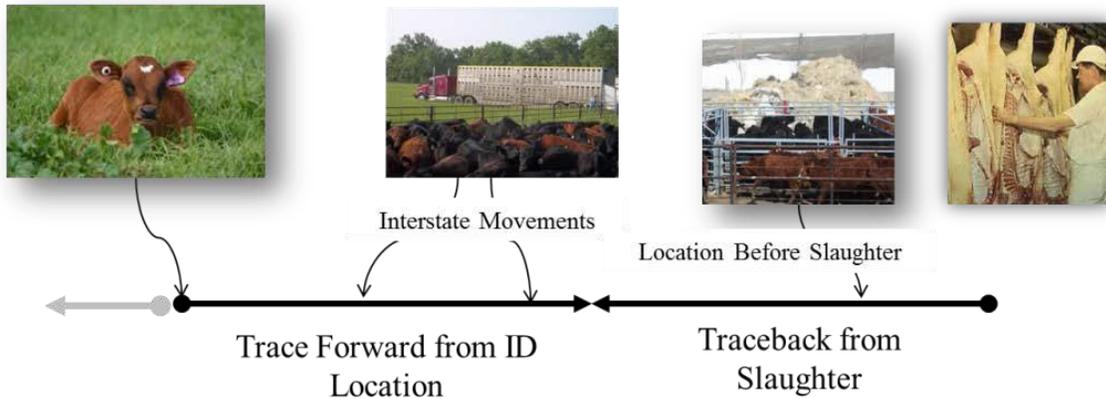
- Application to animals moved interstate.
- Administration by the States and Tribal Nations to increase flexibility.
- Encouraging utilization of lower cost technology.
- Transparent implementation through the full Federal rulemaking process.

USDA published a proposed rule, “Traceability for Livestock Moving Interstate,” on August 11, 2011, and the final rule on January 9, 2013. Under the final rule, unless specifically exempted, livestock moved interstate must be officially identified and accompanied by an interstate certificate of veterinary inspection (ICVI) or other documentation. Covered livestock include cattle and bison, horses and other equine species, poultry, sheep and goats, swine, and captive cervids. The requirements do not apply to livestock moving:

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

As currently structured, ADT is a “bookend” system (Figure 1) which enables animal health officials to trace a covered animal forward from the location of official identification and backward from the animal's last location, which is often the termination point or slaughter plant. The rule includes identification (ID) and movement documentation exemptions that support the principle of flexibility at local levels.

**Figure 1. U.S. Traceability with ADT – “Bookend System.”**



ADT also focuses on interstate animal movements to provide information on the originating and destination premises for animals moved from one State to another. Animal disease programs, brand inspection and in certain situations, industry programs like breed registries, performance recording systems, or marketing programs also provide traceability data.

While APHIS focuses on interstate movements of livestock, States and Tribal Nations remain responsible for the traceability of livestock within their jurisdictions. This approach was designed to leverage the strengths and expertise of States, Tribes, and producers and provide them the flexibility to develop the most effective traceability approaches to identify animals moving interstate nationally.

Although the requirements apply to multiple livestock species, the ADT program’s primary focus has been enhancing traceability in cattle as bovine disease eradication programs are phased out. For example, the success of the U.S. brucellosis eradication program, while certainly a positive development, has resulted in a steep decline in the number of cattle required to be tested and therefore officially identified. As a result of fewer cattle with official ID, the time required to trace animals during a disease investigation had steadily increased until the implementation of the ADT program.

Since the rule went into effect in March 2013, the focus of ADT has been the following areas:

- Educating stakeholders about the requirements;
- Identifying animals by using official ID;
- Collecting animal movement information;
- Increasing the number of records in searchable data systems; and
- Monitoring compliance.

Traceability performance measures (TPM), administered through trace test exercises, examine the successful administration of key ADT program elements, particularly official ID devices, ICVI and other movement documents.

# ADT Reviews

ADT has been one of APHIS' top ten priorities since 2013, after the Agency issued a final rule to improve the United States' ability to trace livestock and poultry when disease events occur. In fiscal year (FY) 2015, the APHIS Administrator selected the ADT program for an internal review, as part of ongoing periodic assessments of Agency activities. More recently, APHIS initiated a program and stakeholder review in late 2016, to determine the effectiveness of the framework, as well as implementation successes and shortfalls over the past 3 years. In addition to the program staff assessment, APHIS conducted extensive outreach activities in 2017 with State, Tribal, and Federal animal health officials and industry to obtain grassroots feedback from producers and other sectors of the livestock industry.

The multiple reviews provide insight into how well the program is being managed; the efficiencies gained in administering tracebacks, aspects of ADT that are working well, traceability regulations that are problematic and/or creating confusion, and gaps remaining in tracing capabilities since the implementation of the framework. Such program reviews provide essential feedback, which APHIS uses to identify program priorities and future collaborative opportunities with industry.

## Internal APHIS Review

In FY 2015, two years after the publication of the ADT final rule, the APHIS Administrator selected the program for review by an independent Agency assessment staff that conducts periodic reviews of the effectiveness, efficiency, and performance of APHIS programs and activities. The review team evaluated the effectiveness of the ADT program from the perspective of the animal health organizations and officials that implement it. The assessment provided an objective gauge of how well ADT program officials were implementing goals and managing resources. It also provided information regarding challenges to program performance and opportunities for improvement.

In brief, the review team found:

- The ADT program was well managed, had clearly defined goals and objectives, and was helping State and Federal animal health officials achieve incremental improvements in their animal disease tracing capability.
- APHIS was managing its ADT resources capably. APHIS applied the majority of ADT funding to cooperative agreements with the States, Tribes, and Territories, and to Agency employee salaries. In both cases, direct links existed between the resource application and program activities, outputs, and outcomes. The review team noted, however, that FY 2015 resource levels might not be sufficient to sustain continual program improvement.



- Achieving a more comprehensive and effective traceability system was still a distant goal. Despite the progress recorded, at the time of the 2015 review, most animal health officials indicated that to achieve a truly effective traceability system, the ADT program must:
  - Mandate electronic ID devices for cattle (after officials ensured that appropriate tag and reader technology solutions were available);
  - Incorporate beef cattle under 18 months into the ADT rule.

The review listed several outstanding challenges that APHIS and its cooperators faced in ADT implementation: (1) the program's flexibility, which helped it achieve broad support but also allowed for differing regulatory requirements among the States, potentially affecting compliance, traceability efficiency, and long-term feasibility; (2) available technology, which was limited by effectiveness, cost, and acceptance by stakeholders; (3) resource levels, which may not have been adequate to sustain continual ADT improvement into the future; and (4) the lack of compelling external forces or messaging to influence stakeholders who were opposed or ambivalent towards ADT.

The review also noted opportunities on which APHIS could focus to ensure the program was as well positioned as possible for continuing successful ADT implementation. These opportunities included: (1) conducting more data analysis to focus implementation efforts; (2) continuing to invest in technology that would allow individual animal movements to be recorded at a reasonable cost without impeding commerce; (3) encouraging greater Federal/State collaboration at all levels; (4) setting priorities for ADT funds that became available unexpectedly; (5) leveraging stakeholder relationships to spread information about ADT; and (6) ensuring an updated plan is in place for a full traceability system should a worst-case scenario animal disease event occurrence prompt the immediate implementation of such a system.

In addition to the identified challenges and opportunities, the review team recommended the ADT program focus on establishing definitive performance levels within the current system and structure, identifying the ultimate goal for ADT, and ensuring APHIS is positioned to achieve this goal over the long term.

## ADT Program Assessment

The objective of the assessment conducted by ADT program staff in late 2016 was to evaluate the program and the effectiveness of Title 9, *Code of Federal Regulations* (9 CFR) Part 86 pertaining to animal disease traceability related to cattle and bison. The assessment included evaluation of documentation on actual program traces (e.g., tuberculosis) and trace exercises administered to capture TPMs under the ADT cooperative agreements with States; review of monitoring and compliance efforts including Investigative and Enforcement Services (IES) investigations; and informal discussions with State and Federal animal health officials.

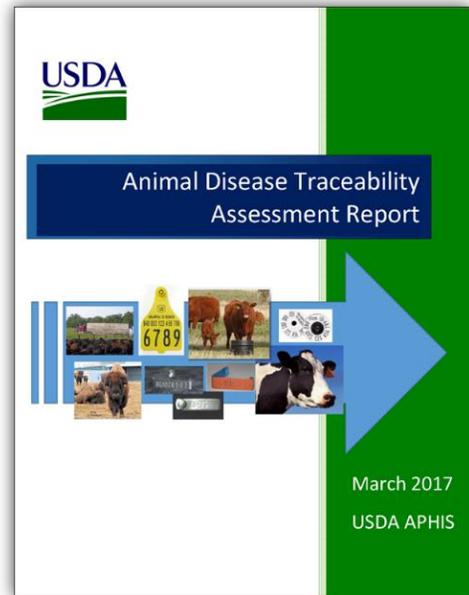
The assessment report reflects that the basic framework of ADT established in 2013 is successfully implemented. The TPMs denote an improvement in the administration of official ID and movement documentation for covered livestock. Specifically the elapsed times to complete TPMs have decreased, and the percent of traces successfully completed each fiscal year has increased. The TPM improvements are primarily attributed to the timely retrieval of electronic records for official ID (tags distributed and tags applied) and movement documents.

While APHIS is confident that implementation of the basic ADT framework was successful, some of its parameters limit the progress of the program, and significant gaps still exist within current tracing capabilities. Examples of these gaps include:

- Application of the official ID requirement only to livestock moving interstate creates significant confusion in marketing channels and enforcement challenges.
- Use of visual-only low cost ID eartags presents obstacles for collecting animal ID efficiently and accurately.
- The traceability regulations do not include feeder cattle, which APHIS views as an essential component of an effective traceability system in the long-term.
- Some federally approved slaughter plants could improve the collection of ID devices at slaughter and the correlation of the devices to the carcass through final inspection.

The full assessment report is available at:

<https://www.aphis.usda.gov/traceability/downloads/adp-assessment.pdf>

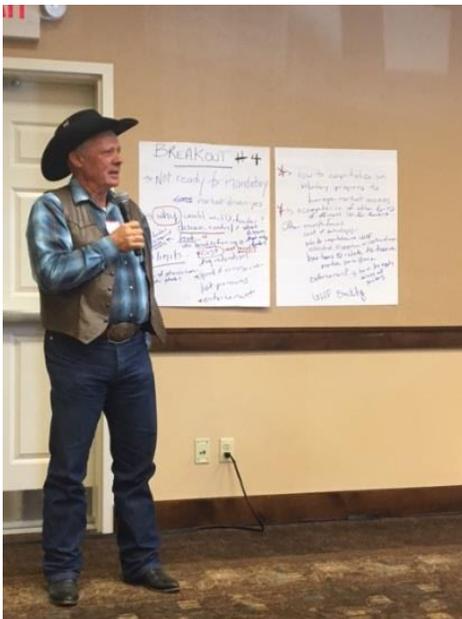


## Public Meetings

As an adjunct to the ADT program assessment, APHIS felt it was essential for industry stakeholders from all sectors of the cattle industry to offer their opinions on relevant issues to help define traceability objectives and how they want to achieve those goals. APHIS conducted nine ADT public

meetings at the locations listed below as part of the outreach efforts in 2017. The purpose of these meetings was to solicit industry input regarding their experiences with ADT: What areas are working well? What aspects are challenging, confusing, or problematic? How can these obstacles be rectified? What level of traceability should be considered if we are to move beyond the basic traceability framework?

Stakeholders also had the opportunity to comment on the current ADT framework via *regulations.gov* through July 31, 2017. APHIS received 462 written comments during this period. A summary of the feedback obtained from the public meetings and written comments are included on page 11.



**Location / Dates of Public Meetings**

- Oklahoma City, OK – April 11, 2017
- Riverdale, MD – April 13, 2017
- Nashville, TN – April 20, 2017
- Bloomington, MN – May 2, 2017
- Denver, CO – May 4, 2017
- Sacramento, CA – May 11, 2017
- Billings, MT – May 24, 2017
- Omaha, NE – July 18, 2017
- Fort Worth, TX – July 20, 2017

**State Federal ADT 2017 Working Group**

In 2017, APHIS established a State-Federal ADT Working Group in accordance with the Federal Advisory Committee Act to assist APHIS in reviewing the ADT regulation, examine feedback from the public meetings and written comments, and provide input based on their experiences with

disease traceability issues. ADT staff worked through the National Assembly of State Animal Health Officials to obtain representation for each U.S. Animal Health Association district. The working group focused on aspects of ADT related to cattle and bison. The group met every two weeks via conference call starting March 21, 2017.

Members of the working group are listed below and the working group’s preliminary proposals for addressing key traceability issues are covered on page 16 of this report.

Name	Affiliation
Geiser-Novotny, Sunny	Cattle Health Staff/ ADT Veterinarian, APHIS VS SPRS
Hammerschmidt, Neil	Manager, ADT, APHIS VS SPRS
Halstead, Steve	District Director, APHIS VS SPRS
Hickam, Linda	State Veterinarian, Missouri Department of Agriculture
Hughes, Dennis	Nebraska State Veterinarian, Nebraska Department of Agriculture
Kitchen, Diane	Veterinarian Manager, Florida Department of Agriculture and Consumer Services
Linfield, Tom	Assistant District Director, APHIS VS SPRS
Massengill, Rose	Animal Identification Coordinator, APHIS VS SPRS
McGraw, Paul	State Veterinarian, Wisconsin Department of Agriculture, Trade and Consumer Protection
Odom, Rick	Animal Health Information Systems Manager, Virginia Department of Agriculture
Schwablander, Stacey	Senior Veterinarian, Minnesota Board of Animal Health
Scott, Aaron	National Preparedness and Incident Coordination Center (NPIC), APHIS VS SPRS
Smith Justin	Deputy Animal Health Commissioner, Kansas Department of Agriculture
Steck, Allie	Animal Disease Traceability Coordinator, Pennsylvania Department of Agriculture
Turner, Alex	Traceability Veterinarian, Colorado Department of Agriculture
Westly, Rolf	Veterinary Medical Officer, APHIS VS SPRS
Winslow, Thatch	Assistant State Veterinarian, Wyoming Livestock Board
Zaluski, Marty	State Veterinarian , Montana Department of Livestock

# Summary of Feedback on the ADT Program

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Since the publication of 9 CFR Part 86 in January 2013, APHIS has sought feedback on the ADT framework from industry, State, Tribal, and Federal animal health officials with the goal of enhancing our tracing capabilities for emergency response, disease control, and eradication programs. This report summarizes the most recent stakeholder feedback that APHIS received during a series of nine public meetings held across the nation this year and through a Federal Registry notice requesting comment on the program.

Participants in attendance at the ADT public meetings expressed appreciation for the opportunity to discuss the ADT framework and collaborate with APHIS on future traceability objectives. Both meeting attendees and written comments acknowledged that the general framework has been successful in improving the official ID of covered livestock, the documentation of interstate movement, and the availability of those records. The information below summarizes the concerns with the original framework and considerations of future traceability opportunities.

## *General Concerns*

**Confidentiality and Security of Information Systems:** The issue of confidentiality continues to be an issue of concern among producers, as is the overall security of the information technology (IT) systems. The producers indicated support for the ADT implementation changes that placed more responsibility for holding their information at the State-level.

**Liability:** Producer liability remains an area of concern. Previous discussions on animal ID primarily focused on producer liability when diseased animals are traced to a premises that may have held the animal prior to the infection. Recent discussions involved concern about the liability related to injury of animals or personnel when working cattle for tagging, manually reading tags, etc.

**Cost:** Meeting attendees and commenters stated that the cost of traceability must be distributed across all sectors of the industry. In particular, if electronic ID (EID) technology is implemented as the only method of official ID, the cow/calf industry should not cover the cost of EID tags when the entire industry benefits. Some commenters noted that other sectors would contribute significantly to the cost of the infrastructure for EID and as a result, the cost to implement EID would not be borne by the cow/calf sector alone.

**Small Producers:** APHIS should consider issues associated with requiring small producers to comply with an enhanced traceability regulation, including costs that are proportionally higher for this segment of the industry due to economy of scale and management limitations (for example, the ability to tag their own cattle). This sector includes a significant number of producers and cattle. Thus, their viability impacts markets and other service providers. Producers that sell their beef products direct to consumers provided many written comments that expressed their concerns about the cost and burden associated with animal ID, in particular, electronic methods. Individuals from this sector also noted that their animals are already traceable from custom slaughter facilities back to their premises.

## *Common Issues Regarding the Current ADT Framework*

**Focus of ADT:** Some participants believe that APHIS should administer ADT for animal disease control and leave marketing opportunities to Agricultural Marketing Service (AMS) programs and the private sector. However, feedback also acknowledged the need for the United States to have a national traceability program to meet international trading partners' requirements for animal disease control and felt the two topics are linked to one another.

**Beef Feeder Cattle (Beef Feeders):** The inclusion of beef feeders in the official ID requirement was the primary topic of discussion at public meetings. While a large number of stakeholders acknowledged that beef feeders need to be part of the official ID requirements at some point, the consensus was to address the gaps in the current framework, which covers beef breeding cattle over 18 months of age and all dairy, before expanding the official ID requirements to beef feeder cattle. Additional points of consensus regarding the official ID for beef feeders included:

- The expansion of regulations for the official ID of beef feeder cattle under 18 months of age must conform to normal rulemaking procedures.
- Beef feeders could be included after an expanded framework is fully functional for breeding animals, including the requirement for official EID and the supporting infrastructure.
- Other individuals suggested incremental implementation of beef feeder requirements; with the initial objective to obtain birth premises ID and tag retirement, then as infrastructure becomes established, phase in the collection of movement data.
- While beef feeder cattle official ID requirements should be delayed, discussion on the processes to include beef feeders in the ADT program should continue ensuring preparation of an implementation plan.
- APHIS should conduct a cost-benefit analysis on official ID/traceability of beef feeder cattle to support future discussions/decisions on this topic and to determine the level of traceability warranted for beef feeder cattle.
- Livestock markets, while supportive of tagging sites for the population currently covered, explained that the burden of tagging beef feeders at their auctions is not feasible and solutions to tagging at the farm/ranch or before arriving at the auctions are essential. An alternative suggestion was to apply the official tag for these cattle at the first receiving premises when working these cattle for management purposes. The records of tags applied should provide contact information of the person responsible for the cattle when sold at the markets.
- Some individuals expressed concern that the official ID of all beef feeders would diminish market advantages and premiums of added-value programs.

**ID to Birth Premises:** To better achieve traceability, most individuals supported the need to apply official ID at the birth premises for animals covered by the official ID regulation. If that is not practical, they supported tagging at change of ownership or first point of commingling, versus at the time of first interstate movement, provided the animals are traceable to the birth premises. Since beef cattle under 18 months of age would remain exempt until determined otherwise, producers would officially identify adult beef animals when first shipped after 18 months of age for change of ownership or commingling.

**Flexibility and Exemptions:** Feedback from the meetings indicated that industry feels the current framework is too flexible and that there are too many exemptions, which confuse the interpretation of the regulations. While recalling the reasons for the exemptions and their intent, there was strong consensus that the exemptions create too many traceability gaps in the classes of cattle and bison covered under the current rule. The exemptions also make enforcement of the existing regulation more challenging, as it is difficult to determine if an animal at subsequent locations required official ID earlier in life.

**State Differences:** There was a strong consensus more standardization and uniformity of State import requirements is necessary. Preparing interstate certificates of veterinary inspection (ICVIs) has become very complicated. Individuals referenced the requirement by some States to record official ID numbers of dairy steers on ICVIs as one example of how State regulations differ from the Federal regulation and from one State to another.

**Uniform Enforcement:** The livestock markets voiced concerns that enforcement of the current regulation is inconsistent and unfairly targets markets, while private treaty sales and online auctions are not monitored or held to the same degree of accountability. They identified the lack of enforcement for other industry sectors as a gap that must be rectified. There was a strong sentiment that more stringent enforcement actions at the markets would drive sales through non-market venues. However, most individuals agreed that compliance would automatically improve if all cattle (less beef feeders) required official ID on first movement from the birth premises.

**EID Technology:** Many industry participants and animal health officials agreed that EID is necessary to achieve cost-effective traceability. Producers, market managers, accredited veterinarians, and others expressed concerns about cattle handling challenges and economic losses created by the need to restrain cattle to manually read and record the official ID number on small visual-only eartags. While the National Uniform Eartagging System (NUES) tags – traditionally known as the metal clip “brite” tags – are inexpensive to purchase, individuals from across the industry indicated there is significant expense throughout the production chain associated with their use. Feedback also indicated that many support the phase-out of free NUES tags and that APHIS should eliminate them as an official method of ID. However, multiple issues need to be addressed before the transition to EID can occur, including:

- If radio frequency ID (RFID) is to be utilized, the establishment of standards, including one technology (low-frequency (LF) vs ultra-high frequency (UHF)) is critical. Most stakeholders supported a dual technology tag as an interim measure.
- The infrastructure must be in place to support the transition to EID.
- Cost remains the primary concern of producers and representatives from other sectors of the industry for both the reader infrastructure and tags; however, the use of EID would provide substantial savings due to the increased efficiency associated with the technology.
- Availability and use of electronic forms, in particular, electronic ICVIs. Obtaining records electronically would decrease cost and improve the completeness and accuracy of the data. Additionally, retiring animal numbers at slaughter would be feasible, where it has been cost-prohibitive with visual-only tags.
- A cost analysis on metal NUES tags to show the full cost of tags when working cattle to manually record ID numbers (labor, stress and shrink, injury, etc.), as well as their limitations relative to traceability, e.g., tag retirement, to more accurately illustrate the

costs of both visual-only and EID tags.

- Proportionally higher implementation costs for smaller producers, who sell direct to consumers and believe their livestock are already highly traceable.

**Movement Documents:** Discussions around movement documents focused primarily on the need for an ADT program definition of a movement document, including the necessary data elements as the minimum standards. Importing States should determine additional requirements for animal health certificates, ICVIs, permits, etc. The proposal to establish a nationally standardized, electronic movement document alternative to ICVIs garnered participant support. Additionally, there was support to increase the value and volume of owner-shipper statements (OSS) by implementing an efficient process to collect and store OSS information by offering an electronic version.

**Collection of ID at Slaughter:** As reported in the ADT assessment, APHIS noted inconsistencies with tag collection and their accurate correlation to the carcass at some slaughter facilities. APHIS is working with field personnel and the Food Safety Inspection Service (FSIS) to address the issue. State animal health officials and industry recognize this shortfall and identify it as a high-priority gap in the current framework that needs to be rectified.

### *Other Comments*

**Official ID Tags:** There are differing views on using the same eartag for both official ID and management. Some producers prefer the same tag for both purposes, as it makes the tagging process more efficient and the official tag works well with herd management practices. Other producers commented that when they purchase cattle with official IDs with existing management numbers on the same tag, it creates conflict with their management numbering systems and subsequently, they prefer not to have such tags used for ADT. However, there was consensus that APHIS should consider the use of one basic official eartag to increase the awareness of which tag is official, lessen accidental removal, and improve compliance. Additionally, commenters recommended that ID devices approved for AMS' Process Verified Program (PVP) and those designated as official by APHIS ADT should be compatible.

**Brand certificates and inspection:** Individuals commented on the long-term value of brands and brand inspection. Commenters stated that official ID tags should not be represented as an alternative or promoted to replace brands. Animal health officials in brand States noted the value of brands and brand inspection for proof of ownership and providing information when conducting traceback investigations, but admitted that brands alone do not provide the level of traceability needed for disease control.

**Outreach:** Many commenters indicated that APHIS and States would need to ensure enhanced outreach efforts to reach producers regarding revisions to traceability requirements.

**Recording Official ID Numbers:** Participants raised the issue of recording individual ID numbers on ICVIs, and provided the suggestion to list ranges of numbers to avoid having to rework cattle after a sale to obtain the specific IDs going to each premises. Individuals also suggested that a premises ID number tag could suffice for traceability to avoid the current challenge of recording individual IDs.

**Cattle Imported to the United States:** Some industry participants expressed concern regarding mandated traceability in the domestic herd for ADT while allowing importation of animals and/or products from countries affected with foot-and-mouth disease (FMD) and tuberculosis (TB), such as Brazil and Mexico, respectively. Additionally, attendees raised concerns about the quality of diagnostic tests and vaccination options related to TB and brucellosis, and the lack of available funding to improve those and the FMD vaccine bank.

**Data Systems:** Many State animal health officials expressed concern that APHIS' data systems are not efficient and indicated that even enhanced traceability would fail without efforts to increase electronic submission of data and data sharing capabilities.

## *\*Proposed Direction from State-Federal Working Group<sup>1</sup>*

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The State-Federal ADT 2017 Working Group reviewed the ADT regulation, examined feedback from the public meetings and written comments, and provided input based on their experiences with disease traceability issues to provide the following preliminary proposals pertaining to traceability of the cattle sector.

### 1. INTERSTATE MOVEMENTS THAT DO NOT APPLY TO THE TRACEABILITY REGULATIONS

Smaller producers that raise cattle for direct sale of meat products to consumers express concern regarding the cost of future traceability requirements. The regulation does not pertain to interstate movements to a custom slaughter facility for preparation of meat (in accordance Federal and State regulations) as such cattle are highly traceable to the premises of origin in the event of disease detection at the slaughter facility.

#### **Proposal**

Maintain the policy that traceability regulations do not apply to interstate movements to a custom slaughter facility in accordance with Federal and State regulations for preparation of meat.

Note: The proposal listed in #3 below clarifies that the exclusion of movements to custom slaughter would pertain only to animals that were born on the premises that ships directly to the custom slaughter facility.

### 2. CATTLE POPULATION COVERED IN THE OFFICIAL IDENTIFICATION REGULATIONS

The initial ADT regulation excluded beef cattle under 18 months of age from the official ID requirement. While most stakeholders acknowledged that the regulation should include this sector of the cattle industry at some point, there is overwhelming support to address several shortfalls or gaps within the current ADT framework first. Proposal 14 of this report specifically addresses the requirement of official ID for beef feeder cattle.

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<sup>1</sup> The proposed direction provides a summary of stakeholder feedback, but does not necessarily represent the position of USDA

## **Proposal**

Maintain the current population of livestock covered by the official ID requirements. The ADT rule will continue to include:

- All dairy
- Beef cattle > 18 months of age
- All rodeo and exhibition cattle

Industry leaders should evaluate the merit and practicality of including official ID requirements for beef bulls and beef heifers under 18 months of age specifically sold for breeding purposes. This approach aligns with the priority to identify breeding animals and would align with some existing State requirements. The working group acknowledges the potential confusion and difficulty of enforcing this requirement, thus recommends industry provide feedback on this issue.

### **3. LIMITING OFFICIAL IDENTIFICATION REQUIREMENT TO INTERSTATE MOVEMENTS**

The most significant impediment to disease traceability resulting from 9 CFR Part 86 is the restriction that the official ID requirement applies only to livestock that move interstate. Cattle movements are quite diverse, often with multiple congregation points and opportunities for disease spread prior to interstate movement. An individual animal infected with a highly contagious disease may never leave the State where it was born, remaining unidentified while spreading disease to many other animals that subsequently move to several new states.

The regulation creates significant confusion in marketing channels where cattle of differing requirements may be mixed, as well as enforcement challenges and complications. The interstate ID requirement often places the onus on livestock markets, where the sorting and tagging of animals is often cumbersome and may fall short of full compliance. Additionally, the ability to determine compliance with the official ID requirement at slaughter plants is nearly impossible due to limited resources.

## **Proposal**

Cattle should be identified to their birth premises<sup>2</sup>, thus the official ID records must provide birth premises information for the animal. APHIS should revise Federal regulations to include interstate commerce and the appropriate authority – either USDA or State officials – should establish regulations that trigger official ID requirements at:

- Change of ownership
- First point of commingling
- Interstate movement (may reflect no sale and no commingling)

### **4. ELECTRONIC IDENTIFICATION SYSTEM FOR CATTLE**

Possibly the most significant change in stakeholder opinion since the establishment of the

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<sup>2</sup> The phrase, “identified to birth premises” is referenced in this report. While it is preferred that cattle are tagged at their birth premises, it is acknowledged that there are situations where the tagging process can be accomplished more efficiently at subsequent locations. The phrase “identified to the birth premises” allows for tagging at other locations with the acknowledgment that the record of tag applied provides the birth premises information for the animal tagged.

current ADT framework in 2013 is an increase in support for EID for cattle. Stakeholders expressed interest in moving forward with EID, or specifically RFID, at each of the nine ADT public meetings in 2017. However, there continues to be some stakeholders that are not supportive of EID for livestock in general.

Many animal health officials, as well as industry stakeholders, acknowledge that the level of traceability necessary in the United States is unachievable with visual only tags. While the NUES tags, traditionally known as the metal clip “brite” tags are inexpensive to purchase, there is significant expense throughout the production chain associated with their use. Producers, market managers, accredited veterinarians and others express concern about animal handling challenges and economic losses created by the need to restrain cattle to manually read and record the official ID number on NUES.

APHIS is conducting a study on the costs associated with NUES tags to reflect the full cost associated with the manual collection of NUES numbers and the inability to retire these numbers after slaughter due to expense.

The ultimate success of an EID system hinges on identifying a high majority of the cattle population with a compatible EID tag to gain the greatest efficiencies possible from the technology. Maintaining a parallel visual only eartag system that requires manual recording of ID’s on a significant portion of cattle would make the cattle handling processes more cumbersome and increase cost.

Many additional questions exist when considering comprehensive EID solutions; particularly, regarding the cost of tags and readers and how to standardize the technology in order to ensure system compatibility across manufacturers. Multiple, or competing, EID technologies would cause significant confusion, conflicts, and financial challenges. Therefore, it will be highly desirable to define a single technology standard. It is also essential that any new standards support the movement of animals at the speed of commerce<sup>3</sup>.

### **Proposal**

The United States must move toward an EID system for cattle with a target implementation date of January 1, 2023. A comprehensive plan is necessary to address the multitude of very complex issues related to the implementation of a fully integrated electronic system. A specialized industry-lead task force with government participation should develop the plan, with a focus on several key objectives, including:

#### *Standardization*

- Propose minimum performance standards that work at the speed of commerce for all cattle handling environments at a highly effective read rate (e.g., >95% read rate).
- Propose a non-proprietary, cost-efficient, and effective technology solution, based on results of performance evaluations that adhere to established technical communication standards and will ensure compatibility of devices across manufacturers.

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<sup>3</sup> Interpretation of “speed of commerce”: Referred to as, “compatible with existing accepted commerce systems; the ID device/method shall be compatible with existing accepted commerce systems, allowing for the reading/recording of official ID in a safe and humane manner at a pace that does not impede the normal and accepted processing time; and shall be compatible with Beef Quality Assurance (BQA) and Dairy Animal Care and Quality Assurance (DACQA) standards and practices.”

### *Transitional technology solutions*

- Identify solutions that will “bridge” or incorporate other electronic solutions during a defined transition period (ensure workability of current/existing technologies).

### *Timelines*

- Propose a realistic timeline with key steps to support the transition to a fully integrated EID system. Key steps should include:
  - Set a date for when visual only official tags will no longer be available (manufactured, distributed, sold or provided; including “brite” NUES tags from USDA). The objective would be to use a phase-out period to deplete visual tag inventories. Cattle with official visual only tags prior and through the transition period would not need be retagged with an EID tag.
  - Set a date for when all cattle needing official ID must be identified with official EID, e.g., January 1, 2023. Cattle with visual only tags after this date will require retagging with an official EID tag.

### *Funding*

- Consider funding options for addressing cost concerns, such as,
  - Federal startup funds.
  - Startup incentives; cost share, etc.
  - Allow small producers to obtain equivalent of volume discounts, etc. (e.g. 1st 20 tags for \$x.00 regardless of volume purchased).
  - Spread cost equitably across industry sectors.
  - Utilize funds currently in place to support NUES tag acquisition and distribution on EID investments.

In addition, the working group recommends the following actions related to EID:

- APHIS should first discontinue providing free NUES tags, then phase them out according to the EID implementation timeline.
- Utilize compatible EID tags in all cattle disease programs, for example the brucellosis program should move to an orange Official Calfhood Vaccinate EID tag exclusively.
- Reexamine the requirement to record existing official ID numbers when applying an EID tag to individual animals already officially identified with visual only tags. Waiving the recording of the official number of the visual tag(s) when first enacting the official EID tag requirement will help minimize the burden to the industry to fulfill this requirement.
- Solicit industry and other stakeholder feedback on the proposed plan after publication by the task force. USDA should only consider rule making that defines the selected official EID method for cattle if a majority of the cattle industry is supportive of the proposed EID implementation plan.
- Develop an extensive communication plan to support the clear understanding of future requirements.

## 5. ADMINISTRATION OF ELECTRONIC RECORDS

The working group acknowledges that the full utilization of electronic records is essential for effective administration of the ADT program and considers them part of the overall electronic system. Tremendous gains have been achieved over the past several years in increasing the volume of electronic records to support animal disease control programs. In addition, the establishment of independent State surveillance and traceability information systems has been well received. However, data sharing between these independent systems is becoming an increasing issue of concern among animal health officials since there is no established mechanism for data sharing from State to State or between Federal and State systems. The investments in obtaining electronic records, particularly converting paper based forms to electronic media, has been both successful and costly. Opportunities to capture data electronically in the field is highly supported and essential to minimize ongoing and costly data entry and scanning processes associated with paper documents.

### **Proposal**

APHIS and States must make the advancement of electronic records an immediate high priority. The enhancements recommended below would increase the ease of collecting data in a standardized format and subsequently provide access to accurate data in near real-time, greatly enhancing the effectiveness of U.S. traceability and disease control programs. The responsible parties should address the following points:

#### *Data Element Standardization and Communication Protocol for Information Exchange*

- APHIS should develop an expandable messaging service independent of all sending or receiving data systems, to support information sharing among States and Federal stakeholders without concerns about the type of systems originating or receiving the data.
- Address shortfalls in the USAHA Data Standards subcommittee-developed electronic ICVI schema; implement state requirements for electronic ICVI vendors to adhere to standardized formats; and confirm USDA adherence to the standard in the Veterinary Services Process Streamlining (VSPPS) system while providing the ability for sharing and receiving information from other ICVI systems.
- Develop a data exchange schema for surveillance events such as tuberculosis testing, brucellosis testing, and vaccination.
- APHIS should provide a web-based application available to State and Federal animal health officials and accredited veterinarians for uploading and manually entering testing, vaccination and movement information, generating the associated forms if necessary and allowing electronic data capture from the web application into the above messaging service.

#### *Animal Health Event Repository (AHER)*

AHER provides a comprehensive search tool for internal APHIS data systems that store animal records containing official ID numbers, including VSPPS, Surveillance Collaboration Services (SCS), Animal Identification Management System (AIMS) and the Emergency Management Response System (EMRS). Access to AHER is currently only available through an EMRS investigation or the TPM utility.

- Develop external State and private system messages that feed into the above

messaging service to forward metadata information to AHER.

- Fund private system message development through ADT cooperative agreements and invite States to participate at their discretion. Make improvements to the existing user interface to assist with other types of animal tracing queries while providing clear and concise results.

## 6. ENFORCEMENT OF ADT REGULATIONS

A high level of compliance with the ADT regulations is imperative for successful animal tracing results. The working group discussed feedback from the public meetings regarding the need for greater uniformity of enforcement, particularly concerning private treaty sales. They also note that increased levels of monitoring are necessary in environments where disease spread is a higher risk and where the disease event would have the most significant impact. These locations are where cattle commingle from various premises and then move to multiple additional premises. Such congregating locations include livestock markets, buying stations, consignment sales, etc. The working group also notes that fewer exemptions and revising the regulation to cover more than interstate movement would improve the ability to monitor for compliance as the current rule allows for many cattle to move unidentified. These exemptions and limitations complicate the recognition of animals moving interstate not in compliance with the official ID requirement.

### **Proposals**

- Continue to target noncompliance by repeat offenders with enforcement actions.
- Work with IES to conduct more timely investigations.
- Maintain a higher level of enforcement oversight at locations where there is a higher risk of disease spread, or which would have the most detrimental impact on the industry.
- Evaluate and implement appropriate enforcement procedures for private sales, internet sales, production sales, herd dispersals, etc.
- Work with transportation agencies to perform spot-checks on highways and at transport nodes to monitor compliance with the ADT regulations during movement of animals.
- Cooperate with States that have resources in the field that could help document and report noncompliance situations to the local VS office and APHIS IES personnel.
- Encourage States of destination to inform States of origin of ADT or other violations.
- Survey State and Federal officials to establish a comprehensive listing of compliance oversight methods used across the country.
- Obtain specific proposals from participants attending the NIAA Traceability Forum.
- Share recommended practices and enforcement methods nationally and encourage local APHIS officials to work collaboratively with State animal health officials to implement appropriate actions.
- Activities of cattle dealers, online auctions and others involved in commercial buying/selling of cattle should be enforced by the State when dealer licensing

regulations apply.

- Collaborate with FSIS to ensure collection of ID by slaughter facility personnel and correlation with the animal and its carcass through final inspection. (For more on this topic, please see proposal 7.)

## 7. COLLECTION OF ID AND ITS CORRELATION TO THE CARCASS AT SLAUGHTER PLANTS

Successful traceability relies on maintaining the animal's identity at slaughter plants through final carcass inspection. Under 9 CFR Parts 86 and 310.2, all ID devices affixed to covered livestock unloaded at slaughter plants must be collected and correlated with the animal and its carcass through final inspection or condemnation by means approved by the FSIS. ID devices must also be packaged with any diagnostic samples from the animal. Success at meeting these requirements is inconsistent across the industry, due to factors such as lack of training and personnel turnover, as well as safety and efficiency concerns related to the collection of ID at the speed of the line. Failure to properly correlate ID to the correct carcass hampers traceability efforts and diminishes the value of the official ID.

### **Proposal**

APHIS should continue the efforts of the State/Federal Slaughter Plant Working Group to improve the rates of ID collection and correlation at slaughter including:

- Development of training and outreach materials on the requirements for new plant, FSIS, and APHIS personnel.
- Monitoring of diagnostic submissions collected to ensure slaughter plants sufficiently apply correlation practices.
- Maintaining constant communication and collaboration with FSIS to assist slaughter plants with correction of failed collection and/or correlation practices.

## 8. PUBLIC/PRIVATE INFORMATION SYSTEM

Confidentiality and security of data remains a significant concern by many cattle producers and must be resolved to strengthen industry buy-in and support for advancing traceability. Private information systems that support various marketing programs, including AMS PVP, branded products, etc. include traceability data that could assist in achieving ADT objectives.

### **Proposal**

APHIS and States need to establish a partnership with industry that would enable utilization of private information systems for disease surveillance and response events. Ideally, establish a communication protocol between the private systems and an animal disease traceability portal that would allow producer data to be maintained in the private systems and made available to animal health officials only when needed for animal disease control and response. Producers would have the choice to maintain their data in a private or public system. APHIS and the States would continue to protect producer data held in their systems and use it only for disease response. The basic concept of the communication protocol should account for:

- Defining data elements and standards for traceability information to which private systems would adhere (primarily official ID numbering formats and premises data).

- Developing a communication protocol that would allow a government portal to message the private system when a search for animal numbers or premises is necessary to respond to an animal disease event.
- Limited access – only State and Federal animal health officials would have access to the portal.

## 9. EXEMPTIONS FOR OFFICIAL IDENTIFICATION REQUIREMENTS

Stakeholders broadly acknowledged that the exemptions for official ID create confusion and challenges to enforce ADT requirements uniformly. The working group reviewed each official ID exemption provided in 9 CFR Part 86.4. The direct to slaughter movements – in particular, those through one approved facility – are of the most concern; however, providing a simple revision to resolve this issue is challenging and needs additional input from the industry.

Referenced below are the exemptions to the current official ID regulations with corresponding proposals. (See Appendix III for complete regulatory text for the official ID exemptions.)

### **Proposal**

#### *Commuter herd agreements*

APHIS should remove the exemption for official ID. The requirement for individually listing the animals' ID number on the movement document should allow for a range of numbers when a high majority of the animals covered under the agreement has official ID numbers within that range, or as agreed upon by the State animal health officials.

#### *Movements directly from a location in one State through another State to a second location in the original State*

The working group maintains the current position that APHIS should not require official ID for these movements.

#### *Tagging sites*

APHIS and States should maintain the option to move cattle to a tagging site where they are tagged on behalf of the owner or person responsible.

#### *Official identification options as agreed on by shipping and receiving State*

APHIS should remove this exemption allowing alternative methods of ID.

#### *Direct to slaughter movements*

The working group recommends APHIS:

- Continue to allow cattle to move from the farm/ranch direct to slaughter on an approved USDA backtag in lieu of the official ID eartag, and retain the stipulation that requires official ID of cattle moved from the slaughter plant.
- Remove the exemptions for cattle moving to slaughter through one approved livestock facility, unless industry, State, and Federal officials collaborate to administer specific control protocols to ensure that these animals move direct to slaughter from the approved facility.
- Consider phasing out the official ID exemptions for direct to slaughter movements, based on the EID implementation timeline, to ensure all cattle covered in the regulation arrive at the slaughter plant with the same technology

tag.

## 10. ICVI EXEMPTIONS AND MOVEMENT DOCUMENTS

The working group reviewed the importance of ICVIs and the challenges they present. As noted in the section on electronic records, the working group believes continued emphasis on electronic ICVIs and other electronic movement records are a high priority. While the working group is not offering a specific change to the ICVI requirements, they provided the following proposals.

### **Proposal**

Obtaining the key components of traceability – accurate and complete records of official ID numbers and the ship from and ship to locations – is critical to ADT program success. In anticipation of technology changes (specifically EID) and acknowledgement of regional differences in the availability of accredited veterinarians, States should consider use of movement documents, such as import permits or other documents that States have used successfully, as alternatives to ICVIs. Stakeholders support consistent requirements; however, the State of destination should be responsible for determining the documents appropriate for collection and compliance of key traceability components for livestock arriving to that State.

The working group provided further proposals regarding ICVI exemptions below:

- Direct to slaughter, including through one approved facility: The ICVI exemption for direct to slaughter cattle is appropriate and should remain. The current exemption for slaughter movements through one market must be restricted to one market movement regardless if it is an interstate or intrastate shipment.
- Direct to an approved facility with an owner-shipper statement: There is concern about the exemption for interstate movements to an approved facility when the cattle move from the approved facility to a premises other than a slaughter plant. The current regulation allows for the exemption unless the cattle move interstate from the market. Removing this exemption and changing the regulation to cover change of ownership would address this issue.
- The ability for cattle to move under commuter herd agreement documents as agreed upon by the State animal health officials should remain. As noted in the official ID exemptions, the State authorities involved will determine if the listing of individual numbers is required or range of numbers is acceptable on movement documents for commuter herds.

## 11. UNIFORMITY OF STATE IMPORT REGULATIONS

The working group reviewed the stakeholder feedback pertaining to the confusion and difficulties that result from variations in State import regulations. The working group suggests limiting the exemptions to 9 CFR Part 86 to clarify and improve the uniformity of the federal requirements across States. For example, eliminating the option for the shipping and receiving States to agree on other forms of official ID would help standardize the official ID requirements.

The working group also noted the need to review official ID requirements separately from those associated with testing and other health issues. For example, many of the health requirements established by States are those that industries within their State have

requested to protect the health of their cattle operations and such issues are often specific to certain regions. The working group did not support expanding health requirements to achieve uniformity, as it would actually lead to more import regulations across the country and would be unwarranted from an animal disease control perspective.

### **Proposal**

9 CFR Part 86 should provide the national standards for official ID and movement documentation. APHIS should continue revision of the regulations to increase standardization considering that eliminating various exemptions will lessen confusion and State differences.

- The promotion of the website InterstateLivestock.com should expand to encourage increased use by accredited veterinarians, producers, livestock markets and others who need information on State import regulations.
- It is essential that States maintain the ability to establish more stringent import requirements.
- Uniformity of State regulations is important to increase the understanding of and compliance with import regulations. However, because disease issues are unique to certain areas of the United States, States should regionalize animal health import requirements as appropriate.

## 12. UNIFORM OFFICIAL IDENTIFICATION EARTAGS

There are differing views on allowing numerous tag types (size, shape, color, etc.), using bangle-like official eartags for both management and official ID purposes, or using one distinct standard tag for official ID. Some producers prefer the same tag for both management and official ID purposes, as it makes the tagging process more efficient. Others indicate a preference for a standard tag for official ID since many producers prefer to remove tags with existing herd management numbers when buying replacements from other dairies and ranches. Comments from stakeholders suggest that one standard tag would increase recognition of official ID and as a result, decrease the accidental removal of official tags. Additionally, there is support for AMS and APHIS to achieve uniformity of devices for both programs. Manufacturers of official ID eartags also indicate that a standard tag would improve manufacturing efficiencies and lower the cost of the official tags.

### **Proposal**

The working group feels there is value in considering a standard, or uniform, official eartag to increase awareness and understanding that it is unlawful to remove the tag. APHIS should conduct a study to determine the potential advantages and disadvantages of having one national ID eartag for cattle. The study should examine the merit a standardized tag might bring to ease of recognizing official tags and its effect on compliance. The study should also include cost comparisons of the use of numerous tag styles, sizes, etc. versus one standard, uniform tag. APHIS should review this information and, if having one uniform tag has significant advantages, publish the one tag concept for public comment through the Federal Register. The actual change, if pursued, would require rulemaking.

## 13. OFFICIAL EID TAG FOR IMPORTED CATTLE

The definition of official eartags in 9 CFR Part 86.4 stipulates that the application of

animal ID number (AIN) tags (commonly referred to as “840 tags”) is limited to livestock born in the United States. As a result, there is no official EID tag with LF technology available to retag imported animals. This has created some challenges in the marketplace. For example, regulations prohibit dairies that use 840 AIN LF tags for herd management, including parlors with integrated daily milk recording systems, from retagging a Canadian import with an 840 eartag. Since there is no official LF EID device, the producer is limited to retagging with a visual or UHF NUES tag and neither tag is compatible with their electronic herd management system. Conflicts with cattle shows that require AIN LF eartags are also becoming more common. This issue will become a more significant challenge if the United States moves to official EID in the future.

### **Proposal**

The ability to maintain the identity of imported cattle is essential. As such, the working group recommends that APHIS allow the retagging of such animals with an official EID tag by revising the traceability regulation to define an “Import Tag” (with a specific range of AINs and tag color). For example, APHIS could reserve a range of 840 numbers starting with “8409” for use on these tags. To help distinguish “Import Tags” that have a panel component, the panel piece of the tag should include the text “Import”. This ID option would clearly identify animals tagged with an 840 Import Tag after importation to the United States; provide producers the option to use compatible EID technologies as preferred; and allows for re-tagging visual only tagged imported cattle with an 840 EID Import Tag (even if the visual only official tag of the exporting country is in the ear). Producers using UHF technology could use USDA approved UHF 840 tags or the USDA approved UHF NUES tags when the State Animal Health Official authorizes this option. The recordkeeping requirements for tagging imported animals would remain the same as currently written in 9 CFR Part 86 for retagging and adding a second official tag. The working group recommends that APHIS prohibit the use of visual only 840 tags in imported animals.

## **14. OFFICIAL IDENTIFICATION OF BEEF FEEDERS**

The inclusion of beef feeder cattle in the traceability regulations is an essential component of an effective traceability system in the long term. However, addressing other fundamental gaps in the traceability framework must occur first. The working group values the feedback from stakeholders regarding the official ID of beef feeder cattle under 18 months of age, and agrees with these points provided by stakeholders:

- Extensive collaboration with industry stakeholders potentially affected by the ID of beef feeders is critical, and official ID of this sector would require separate rulemaking to ensure appropriate review.
- Tagging large numbers of beef feeder cattle is not practical or feasible at livestock markets during peak periods of feeder sales. Therefore, alternative processes need to be established.
- Consider the timely development of a plan for the inclusion of beef feeders in the official ID requirement. This proactive approach will ensure well-defined processes are in place in the event their inclusion is necessary in response to a worst-case scenario animal disease event with minimal advance notice, such as an outbreak of FMD.

- Consider incremental steps for the official ID of beef feeders, particularly policies that allow official ID to the birth premises. Recording of official ID numbers for movement should be implemented over time as technology is highly proven to work at the speed of commerce.
- Providing the option of tagging beef feeder cattle at the next location upon transfer of ownership, including auctions, feedlots and other locations that receive these cattle is essential.
- The USDA should conduct studies to document the level of traceability necessary for this sector and its cost/benefit.

The working group agrees with these statements above and reaffirms that APHIS should address the official ID of beef feeder cattle under 18 months of age through separate rulemaking.

# Appendix

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## Appendix I – List of Acronyms

ADT	Animal Disease Traceability
AIMS	Animal Identification Management System
AIN	Animal Identification Number
AMS	Agriculture Marketing Service
APHIS	Animal and Plant Health Inspection Service
CFR	Code of Federal Regulations
EID	Electronic Identification
EMRS	Emergency Management Response System
FMD	Foot and mouth disease
FSIS	Food Safety Inspection Service
ICVI	Interstate Certificate of Veterinary Inspection
ID	Identification
IES	Investigative and Enforcement Services
IT	Information Technology
LF	Low Frequency
NIAA	National Institute for Animal Agriculture
NUES	National Uniform Eartagging System
OSS	Owner-Shipper Statement
PVP	Process Verification Program
RFID	Radio Frequency Identification
SCS	Surveillance Collaboration Services
TB	Tuberculosis
TPM	Trace Performance Measure
UHF	Ultra-High Frequency
USAHA	United States Animal Health Association
USDA	United States Department of Agriculture
VS	Veterinary Services
VSPS	Veterinary Services Process Streamlining

## Appendix II – Working Group on Slaughter Plant ID Collection & Correlation

On November 9, 2016, APHIS established a working group to address traceability issues and short falls noted in the ADT assessment report.

**Objective:** Improve the rates of ID collection and correlation to the carcass at slaughter plants, to maximize ADT efforts related to disease programs and surveillance efforts.

Specific goals for the working group include:

1. Review ID collection and correlation processes obtained from the top 40 adult and top 22 fed cattle plants to determine best practices for application to all plants, especially those with demonstrated difficulty in proper ID collection and correlation.
2. Develop and implement a plan for routine DNA matching on non-histocompatible VS Form 6-35 submissions to closely monitor proper correlation of ID to the carcass.
3. Develop a protocol for outreach to plants regarding cases where DNA microsatellite test results indicated that tissue/hair associated with ID did not match the lesioned tissue submitted or matching was not possible because no tissue was submitted with the ID.
4. Develop elements for training State/VS field personnel on inspection of ID collection and correlation systems within slaughter plants.
5. Collaborate with FSIS to develop and implement training for FSIS Public Health Veterinarians and Inspectors on oversight of ID collection and correlation systems within slaughter plants.
6. In instances requiring additional information for a lot of cattle that contained diseased animals (from which samples were taken and submitted for diagnostic testing), there is often no data available from many adult-kill plants to assist with reconstructing correlation in retrospect since brucellosis blood sampling ceased. Evaluate the capability of adult-kill slaughter plants to reconstruct correlation of man-made ID to carcasses within a lot that contained diseased cattle for one (1) week after slaughter of such diseased cattle, and develop a plan to address this lack of capability where it exists.
7. Develop a guidance document with FSIS for ensuring the issuance of compliance actions for slaughter plants that fail to properly collect man made ID and correlate it to the appropriate carcass.
8. Update the FSIS ADT MOU.

The working group listed below meet monthly via conference call.

<b>Name</b>	<b>Affiliation</b>
Pat Basu	Chief Public Health Veterinarian - FSIS, OPHS
Brian Bohl	TAHC Veterinarian, TX
Debbie Cox	VS Cattle Health Staff FSIS Liaison
Sunny Geiser-Novotny	VS Cattle Health Staff/ ADT Veterinarian
Neil Hammerschmidt	VS Traceability Program Staff
Robert Kerschen	VS EC, CO
Bob Meyer	Assistant State Veterinarian, WY
Kent Munden	VS Animal Identification Coordinator, TX
Barry Pittman	State Veterinarian, UT
Mark Schoenbaum	VS Cattle Health Staff Epidemiologist
Rob Southall	VS Assistant Director, KY
Dawn Sprouls	District Manager, OFO
Debbie Sumpter	VS Animal Identification Coordinator, CA
Beth Wittenbrader	VS Animal Health Technician, PA

## Appendix III – Official Identification and ICVI Exemptions

Regulation text from 9CFR Part 86.

### § 86.4 Official identification.

(b) *Official identification requirements for interstate movement—*

(1) *Cattle and bison.* (i) All cattle and bison listed in paragraphs (b)(1)(iii)(A) through (b)(1)(iii)(D) of this section must be officially identified prior to the interstate movement, using an official identification device or method listed in paragraph (a)(1) of this section unless:

- (A) The cattle and bison are moved as a commuter herd with a copy of the commuter herd agreement or other documents as agreed to by the shipping and receiving States or Tribes. If any of the cattle or bison are shipped to a State or Tribe not included in the commuter herd agreement or other documentation, then these cattle or bison must be officially identified and documented to the original State of origin.
- (B) The cattle and bison are moved directly from a location in one State through another State to a second location in the original State.
- (C) The cattle and bison are moved interstate directly to an approved tagging site and are officially identified before commingling with cattle and bison from other premises or identified by the use of backtags or other methods that will ensure that the identity of the animal is accurately maintained until tagging so that the official eartag can be correlated to the person responsible for shipping the animal to the approved tagging site.
- (D) The cattle and bison are moved between shipping and receiving States or Tribes with another form of identification, as agreed upon by animal health officials in the shipping and receiving States or Tribes.

(ii) Cattle and bison may also be moved interstate without official identification if they are moved directly to a recognized slaughtering establishment or directly to no more than one approved livestock facility and then directly to a recognized slaughtering establishment, where they are harvested within 3 days of arrival; and

- (A) They are moved interstate with a USDA-approved backtag; or
- (B) A USDA-approved backtag is applied to the cattle or bison at the recognized slaughtering establishment or federally approved livestock facility.
- (C) If a determination to hold the cattle or bison for more than 3 days is made after the animals arrive at the slaughter establishment, the animals must be officially identified in accordance with § 86.4(d)(4)(ii).

### § 86.5 Documentation requirements for interstate movement of covered livestock.

(c) *Cattle and bison.* Cattle and bison moved interstate must be accompanied by an ICVI unless:

- (1) They are moved directly to a recognized slaughtering establishment, or directly to an approved livestock facility and then directly to a recognized slaughtering establishment, and they are accompanied by an owner-shipper statement.
- (2) They are moved directly to an approved livestock facility with an owner-shipper statement and do not move interstate from the facility unless accompanied by an ICVI.
- (3) They are moved from the farm of origin for veterinary medical examination or treatment and returned to the farm of origin without change in ownership.
- (4) They are moved directly from one State through another State and back to the original State.
- (5) They are moved as a commuter herd with a copy of the commuter herd agreement or other document as agreed to by the States or Tribes involved in the movement.
- (6) Additionally, cattle and bison may be moved between shipping and receiving States or Tribes with documentation other than an ICVI, e.g., a brand inspection certificate, as agreed upon by animal health officials in the shipping and receiving States or Tribes.
- (7) The official identification number of cattle or bison must be recorded on the ICVI or alternate documentation unless:
  - i. The cattle or bison are moved from an approved livestock facility directly to a recognized slaughtering establishment; or
  - ii. The cattle and bison are sexually intact cattle or bison under 18 months of age or steers or spayed heifers; *Except that:* This exception does not apply to sexually intact dairy cattle of any age or to cattle or bison used for rodeo, exhibition, or recreational purposes.