



# Animal Disease Traceability

## Summary of Feedback on the ADT Program

September, 2017

Since the publication of the Code of Federal Regulations (CFR) Title 9 Part 86, “Traceability for Livestock Moving Interstate” in January 2013, the Animal and Plant Health Inspection Service (APHIS) has sought feedback on the ADT framework from industry and 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 country in April thru July of this year and through a Federal Registry notice requesting comment on the program. The purpose of these public meetings and comment period was to hear from industry and other stakeholders regarding their experiences with ADT: What areas are working well? What aspects are challenging, confusing or problematic? How can these obstacles be rectified? And what level of traceability should be considered if we are to move beyond the basic traceability framework?

Participants in attendance at the ADT public meetings expressed appreciation for the opportunity to discuss the ADT framework and collaborate on future traceability options with APHIS. Both meeting attendees and written comments acknowledged that the general framework has been successful in improving the official identification of covered livestock and the documentation of interstate movement; and the availability of those records. The information below summarizes the general concerns with the original framework and those for consideration 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 systems (IT). The producers indicated support for changes made when ADT was implemented that placed more responsibility for holding their information at the State-level.

**Liability:** Producer liability remains an area of concern. While earlier discussions on animal identification (ID) primarily focused on tracing diseased animals to an individual’s premises that may not have been responsible for the animal when it was infected, more current discussions also express concern on liability related to injury of animals or personnel when working cattle for tagging, manually reading tags, etc.

**Cost:** Meeting attendees and commenters expressed 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 when the entire industry benefits. 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 can impact 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:** 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 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 included in 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 feeders under 18 months of age must conform to normal rule making procedures.
- Beef feeders could be included after an expanded framework is fully functional for breeding animals, including the requirement for official ID with EID and the supporting infrastructure.
- The U.S. Department of Agriculture should conduct a study to determine the level of traceability warranted for beef feeder cattle.
- Other individuals suggested that requirements for beef feeders be implemented incrementally, with the initial objective to obtain birth premises ID and tag retirement, and then phase in the collection of movement data as infrastructure is established over time.
- While beef feeder cattle official ID requirements should be delayed, discussion on processes to include in this sector should continue in order to ensure an implementation plan is prepared.
- A cost benefit analysis should be conducted on official ID/traceability of beef feeder cattle to support future discussions/decisions on this topic.
- 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 tag at the farm/ranch or before arriving at the auctions are essential.
- Alternative solutions to tagging beef feeder cattle at the markets should be explored. One suggestion was to apply the official tag for these cattle at the first receiving premises, when these cattle are worked for management purposes, with records of tags applied that provide

- contact 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 achieve better traceability, most individuals supported the need to apply official ID at the birth premises for animals that are 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, adult beef animals would be officially identified when first shipped after 18 months of age for ownership change or commingling.

**Flexibility and Exemptions:** Feedback from the meetings clearly indicated that industry feels the current framework is too flexible and that there are too many exemptions, which causes confusion regarding the regulations. While recalling the reasons they were established 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. Additionally, the exemptions 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 strong consensus that there needs to be more standardization and uniformity of State import requirements. 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 will drive sales back into the country. However, most individuals agreed that compliance would automatically improve if all cattle (less beef feeders) required ID on first movement from the birth premises.

**EID Technology:** 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 needs to 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 were supportive of 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 regarding EID, and both the reader infrastructure and tags need to be addressed. However, the use of EID would provide substantial savings due to the increased efficiency associated with the technology.
- State and Federal animal health officials noted that EID would likely increase the 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.
- Individuals suggested 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. This analysis will likely help support the justification for EID technology.
- Smaller producers that sell their products direct to consumers are not supportive of EID technology and noted that their animals are already highly traceable.

### **Movement Documents**

- There was support at one meeting for establishing a nationally standardized alternative movement document to ICVIs with an electronic version.
- 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.
- One State animal health official suggested that APHIS develop a national ICVI form.
- ADT should define a movement document, including the necessary data elements as the minimum standard, and the importing States should determine any additional requirements for animal health certificates, ICVIs, permits, etc.

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

### **Other comments**

#### **Official ID Tags**

- Consideration should be given to one basic official eartag to increase the awareness of which tag is official. Doing so would lessen its accidental removal and improve compliance.
- 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.
- ID devices that are approved for AMS' Process Verified Program 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 that they can provide 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 will need to ensure enhanced outreach efforts to reach producers regarding traceability requirements.

**Recording Official ID Numbers:** The issue of recording individual ID numbers on ICVIs was raised, with the suggestion to consider listing 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 mandating 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. In addition, attendees brought up the quality of diagnostic tests/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 will fail without efforts to increase electronic submission of data and data sharing capabilities.