

## **Animal Disease Traceability Policy Development - Policy Development**

Animal Disease Traceability (ADT) is the mechanism by which the United States tracks and traces animal diseases through the animal agriculture population. The intended goal of the system is to provide rapid and effective response to a disease outbreak. ADT was initiated [by USDA-APHIS] in 2013 as an evolution of previous animal disease traceability programs, including the precursor National Animal Identification System (NAIS). NAIS was a voluntary federal program that hinged on registering animal agriculture premises as well as animal identification and animal tracing standards/procedures. It suffered from low participation, high costs (and low federal funding) and was replaced with ADT in an attempt to reduce complexity, increase participation and lower costs, particularly within the cattle sector. Current Farm Bureau policy dates back to initial efforts on NAIS and was adjusted to cover ADT.

Many exemptions were granted for feeder cattle, commuter herds, and direct-to-slaughter shipments under the first phase of ADT, with the understanding identification for all cattle would be required in future phases, which would also require further USDA rulemaking.

APHIS has held nine meetings across the nation to discuss these performance measures and gather stakeholder feedback on the challenges, weaknesses, and strengths of the program. The challenges identified and presented at the APHIS stakeholder meetings include:

- The lack of data on cattle that were comingled, possibly multiple times, without crossing state lines, which poses a significant risk;
- The reliance on visual tags, which may be the most cost effective identification tool throughout the supply chain, but which poses several inefficiencies when it comes to tracing records, particularly the reliance on hand recorded data;
- APHIS views suggesting that the exclusion of feeder cattle is a fundamental gap in the program; and
- Inconsistent collection and correlation of identified animals at approved slaughterhouses, which creates a significant gap in systems' ability to track an animal throughout the chain.

While APHIS has not proposed any specific changes to the rule, participants were asked about adjusting the identification triggering event to either the birth of an animal or a change in its ownership. Participants were also asked to consider different technology requirements, such as high frequency RFID, that could apply throughout the supply chain.

As the United States faces increased demands from foreign trade partners and foreign animal disease pressures domestically, we ask for our members to critically evaluate the current policy in an effort to streamline and prioritize components of an animal disease traceability system they would like AFBF to focus on in future rule-making. An efficient, cost-effective and reliable animal traceability system is increasingly important both to domestic and international customers, as well as critical to ensuring

rapid, effective response to a disease outbreak for our livestock, dairy and poultry producers. As the ADT continues to evolve, our policy needs to ensure the ability to keep the needs of our members reflected in whatever changes USDA may propose.

AFBF policy under 308/Livestock Identification has some potential conflicts that may arise should we enter a new rulemaking process. Two questions that likely will need to be answered and addressed should a new rule arise are as follows:

1) Trigger Mechanism. Current policy dictates that livestock should only be required to be identified until transported across state lines (308.5.5). ***Should our policy be open to other potential trigger mechanisms such as change of ownership or birth/origin?***

2) Inclusion of Beef Cattle under 18 months of age. Current policy supports the exclusion of feeder cattle under 18 months of age and those going direct to slaughter (308.5.9). This is a key issue moving forward because of the amount/likeliness of comingling of these cattle. APHIS views this as a fundamental gap in Animal Disease Traceability. ***Should policy continue to support this exclusion regardless of trigger mechanism?***

There are also some potential conflicts in our policy relating to types of identification and control of the program:

1. Types of Acceptable Identification: Farm Bureau policy supports uniform electronic systems (308.5.10), continued acceptance of hot brands (308.5.12), and traditional methods of ownership identification (308.1). ***Should our policy be adjusted to support a more uniform national standard?***
  - a. Secondly, our policy expresses interest in developing identification that enhances value-based marketing (308.5.11), is simple and cost-effective (308.5.1), and that meets reasonable Identification requirements of trade partners (308.5.13). ***Should our policy focus on the needs that best suit those of our domestic ADT program or try to develop a more comprehensive tagging system that can address multiple issues?***
2. Control and Ease of Response: The current program is managed by states so that they can make allowances for local situations. The result is that different standards exist in different states, ranging from states that more closely resemble full traceability to those that only meet the minimum federal requirement. Farm Bureau policy supports bringing all disease programs under one umbrella (308.5.8) and establishing a national system that is fast and effective but keeps control in the hands of states/tribes (308.3). ***Should the policy focus on creating a uniform national system that is accessible to all states/tribes or maintain state-based control of disease programs?***