

White Paper

**Joint Strategy Forum on
Animal Disease Traceability:
Bringing Industry and Regulatory Leaders
Together to Create Sensible Solutions**

Information synthesized from Aug. 6-7, 2013, Joint Strategy Forum on Animal Disease Traceability in Denver, Colorado

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BACKGROUND

On December 20, 2012, the U.S. Department of Agriculture (USDA) announced a final Traceability for Livestock Moving Interstate rule that established general regulations for improving the traceability of U.S. livestock moving interstate. The rule—listed in the Federal Register, Vol. 78, No. 6, January 9, 2013, Rules and Regulations, Pages 2040-2075 (Addendum 1)—became effective March 11, 2013, and is a key component of the country’s Animal Disease Traceability (ADT) program.

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, such as owner-shipper statements or brand certificates. With some exceptions, the ruling applies to cattle and bison, horses and other equine species, poultry, sheep and goats, swine, and captive cervids that are moved interstate. Each animal must be officially identified and accompanied by an interstate certificate of veterinary inspection (ICVI) or other documentation as agreed to by the States and Tribes. All ages and classes of cattle are covered in the rule, except beef animals under 18 months of age, are exempt from the official identification requirement unless the animals are moved interstate for shows, exhibitions, rodeos or recreational events. At this point in time, no timeframe for requiring official identification of this group of cattle—feeder and stocker cattle—has been designated.

By March 11, 2014, all official ear tags manufactured must bear the official eartag shield, and by March 11, 2015, all official eartags applied to animals must include that shield.

Rather than having 48-hour traceability as a focus, the program is designed to minimize U.S. animal disease impacts. In the event of a disease outbreak, the government’s ADT program will help animal health officials determine where diseased animals are and where they’ve been, helping ensure a rapid response. It will also reduce the number of owners or operations impacted by a disease investigation.

While the Federal rule provides for a uniform set of minimum national standards for States and Tribes to follow, State and Tribal officials are responsible for developing, owning, and administering their own traceability systems to meet the federal rules. Key to the ADT program, States are empowered to determine and implement traceability solutions in cooperation with industry that work best for them at the local level. While States and Tribes may adopt requirements not included in the Federal rule, all States and Tribes must accept all official identification methods.

With the publication of the final traceability rule, ADT has specific mandatory requirements that pertain to the interstate movement of livestock.

PURPOSE, DESIGN OF FORUM

The *Joint Forum on Animal Disease Traceability: Bringing Industry and Regulatory Leaders Together to Develop Sensible Solutions* was developed by the National Institute for Animal Agriculture (NIAA) and the United States Animal Health Association (USAHA) and conducted August 6 and 7, 2013, in Denver, Colorado.

Attending the Forum were 168 individuals from 40 states, plus Australia, Canada, Northern Ireland, and Switzerland. Attendees represented state animal health agencies, industry organizations, universities, livestock producers, and allied industry.

The purpose of the Forum was to provide a platform where state veterinarians, brand inspectors, and industry, academia, and regulatory leaders could discuss workable solutions and collaborate to ensure speed of commerce, compliance, and success of the ADT program.

NIAA is a non-profit, membership-driven organization that unites and advances animal agriculture: the aquaculture, beef, dairy, equine, goat, poultry, sheep, and swine industries. NIAA is dedicated to furthering programs working toward the eradication of diseases that pose risk to the health of animals, wildlife and humans; promote the efficient production of a safe and wholesome food supply for our nation and abroad; and promote best practices in environmental stewardship, animal health and well-being.

USAHA is a science-based, non-profit, voluntary organization that serves as a forum for communication and coordination among State and Federal governments, universities, industry, and other concerned groups for consideration of issues of animal health and disease control, animal welfare, food safety and public health. It is a clearinghouse for new information and methods, which may be incorporated into laws, regulations, policy, and programs. It develops solutions of animal health-related issues based on science, new information and methods, public policy, risk/benefit analysis, and the ability to develop a consensus for changing laws, regulations, policies and programs.

An ADT implementation survey was conducted in July 2013 by USAHA, NIAA, USDA, and Livestock Marketing Association (LMA). As anticipated, the survey showed various solutions and processes that States are using to implement ADT to achieve traceability. (Addendums 2 and 3). Some of these variabilities have the potential to negatively impact speed of commerce, increase frustration among participants, and complicate compliance.

The symposium was funded in part by USDA Animal and Plant Health Inspection Service (APHIS) Veterinary Services (VS), Livestock Marketing Association, National Livestock Producers Association, Western Dairy Association, *BEEF* magazine, *National Hog Farmer* magazine, *Feedstuffs* magazine, and Allflex.

FORUM PLANNING COMMITTEE

Forum Planning Committee Co-Chairs:

Victor Velez, California Department of Food and Agriculture, Animal Health and Food Safety Services

Robert Fourdraine, PhD, Ag Source Cooperative Services

Steve Halstead, DVM, Michigan Department of Agriculture and Rural Development

Kevin Maher, GlobalVetLINK, L.C.

Forum Planning Committee Members:

Dennis Baustert, Y-TEX Corporation

Tony Frazier, DVM, Alabama Department of Agriculture & Industries

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Neil Hammerschmidt, USDA APHIS VS

Malcolm Harvey, Fort Supply Technologies Inc.

George Merrill, DVM, New York Department of Agriculture and Markets

John Weimers, DVM, USDA APHIS VS

PRESENTATION HIGHLIGHTS

On December 23, 2003, the USDA confirmed the first case of a cow located in the United States being infected with Bovine Spongiform Encephalopathy (BSE). This disease incident set the course for animal disease traceability in the United States.¹

While a gap exists between reality and perception when it comes to consumers' knowledge of food animal production, consumers equate disease to threats to their food supply and want traceability.²

The U.S. government's final Traceability for Livestock Moving Interstate rule that established general regulations for improving the traceability of U.S. livestock moving interstate took effect March 11, 2013. The objective of the rule is to have an animal-specific record of animal movement from one state to another. Should a disease incident occur, government officials will know where the animal is and has been.

While the Federal rule stipulates a uniform set of minimum national standards for States and Tribes to follow, each State and Tribe is charged with administering traceability activities that align with the Federal rule and have the flexibility to use solutions that work for their producers. While ADT was designed to provide this flexibility, variables among States increase the challenges to transition and implement the new approach.³

Enforcement of the rule will be led by Federal officials with help from States and Tribes. USDA APHIS VS is drafting a document to unify processes and practices for monitoring and compliance. This document will be shared with industry once it is written.

The collection of individual animal identification at harvest and tag retirement is important to ADT, with USDA's Food Safety and Inspection Service (FSIS) charged with collection of individual animal identification at harvest. A Memorandum of Understanding (MOU) between USDA APHIS VS and USDA FSIS outlines mutual responsibilities, FSIS responsibilities, and APHIS responsibilities. The biggest difference between the way FSIS collects the devices now and what the MOU outlines is that, depending on the agreement with the slaughter establishment, FSIS must ensure that the establishment employees securely store the devices for up to seven days and ships the devices to the location identified by APHIS in order to support the retirement of animals and official numbers from the APHIS ID Tag Retirement List.⁶

Two pilot projects focused on tag collection and retirement have been completed, and third project is planned for this fall. The goal is to develop standard operating procedures for data entry and to estimate the cost of tag retirement.⁷

As of August 6, 2013, the President's Fiscal Year 2014 budget includes \$14 million for traceability.⁸ While this budget is malleable and cooperative agreements will be flexible, the budget's one key restriction is funding development of IT systems.⁹

The current priority of USDA APHIS is to work collaboratively with States and Tribes on ADT outreach and education.¹⁰

ADT Implementation Challenges

In July 2013, the USDA, in cooperation with NIAA, USAHA, and LMA, conducted a survey of all State animal health regulatory officials. The four-part survey, in which 41 out of 50 States participated, addressed information technology (IT) systems, location identifier, tagging sites, National Uniform Eartagging System (NUES) tags, administration of movement documents, optional official identification methods, interstate movement requirements for official identification, interstate movement documentation requirements, and intrastate movement requirements. (ADDENDUM 2)

Among the similarities and differences in ADT programs among States were:¹¹

- 39 States make electronic ICVIs available; two do not.
- 32 States utilize Owner Shipment Statements; nine do not.
- 25 States have commuter herd agreements with other States, 23 have alternative identification agreements and 20 have agreements for movement documents other than ICVI and Owner-Shipper Statements (OSS).
- 19 out of 41 States accept brands as official identification: five accept them in all cases and 14 in limited cases.
- 31 out of 41 States breed registries as official identification: 15 accept breed registries in all cases, 11 accept them in limited cases and five did not indicate if breed registries are accepted in all cases or in limited cases.
- Some States require official identification for cattle not covered by the Federal rule: Nine States require official identification on steers and spayed heifers under 18 months of age entering their State and 16 require official identification for sexually intact beef animals under 18 months of age.
- States do not use the same primary animal health IT system: 12 States use Surveillance Collaboration Services (SCS) provided by USDA APHIS VS; four States use Core One obtained direct from Trace First; 13 States use USAHerds; and 10 States use a State-developed system. One State did not provide an IT system name.

One group of livestock that travel significantly through numerous states during a year and are included in the ADT program is rodeo stock and animals owned by competitors. Current Professional Rodeo Cowboys Association (PRCA) rules require identification—for disease traceability purposes and for competitors' information.¹² With States having their own specific animal identification requirements, it will be important for this group to be informed regarding the official identification of States they are entering.¹³

While recordkeeping has increased since the first BSE incident and more and more producers understand the need for individual animal identification, not all livestock and poultry producers fully embrace the country's mandatory ADT program, and they have a variety of reasons for not being favorable toward the government's ADT program.¹⁴

Programs undertaken by various species within animal agriculture underscore the importance of outreach and education. Among the tactics that have shown to work within animal agriculture include one-on-one visits with livestock markets and sale barn veterinarians,¹⁵ posters at strategic locations,¹⁶ inserts in producer checks,¹⁷ articles in association newsletters,¹⁸ meetings specifically for large animals

veterinarians and producers,¹⁹ and state animal health official speaking at producer meetings.²⁰ Outreach and education should include “what’s in it for me” information, examples that entities can relate to and a value statement that resonates with producers and drives them to action.²¹ While programs such as the USDA-funded Scrapie program and the swine industry’s voluntary premises identification program achieved 80 percent involvement, ADT is different as it is mandatory—and mandatory makes a difference.²²

Working Toward Compliance

Those attending the ADT Forum stressed that, in addition to outreach and education, compliance will require:

- States, Tribes and those in animal agriculture, from farm to harvest plant, working together.²³
- Implementation be resolved at the State level.²⁴
- Cost be minimal to those involved.²⁵
- Producers, livestock markets and all involved entities having access to and understanding the rules of the shipping and receiving states.²⁶
- All parties involved understand that there is no perfect system.²⁷
- A “what can we do to make this work” attitude be adopted.²⁸
- Improved retention of identification devices: eartags and RFID tags.²⁹
- Technology and the rapid exchange of accurate and timely information at all levels of food production and marketing.³⁰

Discussions taking place during two reaction breakout sessions—“Consistency and Harmonization of Policy Issues among States” and “Technology Applications and Consistency”—resulted in 17 key points:

- Animal agriculture has a traceability obligation to consumers.
- Disease prevention is important, and the industry wants only healthy cattle moving state to state.
- Each state should willingly share data with other states, focus on the simplistic elements of the ADT rule, start with elementary agreements and build from there.
- For ease of commerce and to increase compliance, bordering states must be in agreement to acceptable forms of ADT documentation.
- The Federal ruling recommendation for the documentation of breeding animals is workable for producers, state officials and others involved in ADT. Challenges arise with animals headed to livestock markets.

- Documentation that includes individual identification within large groups of animals selling through livestock markets presents significant challenges to producers and receiving locations.
- Because safety of personnel applying individual identification is important, applying identification in the specified location per the ADT rule may not be practical or possible.
- Communication among states and sharing information with producers and livestock markets regarding receiving states' approved documentation is critical to the success of ADT.
- While electronic and non-electronic Interstate Certificates of Veterinary Inspection (eICVIs/ICVIs) are acceptable as an identification document, confusion arises with alternative documentation.
- What information is on an identification document is more important than the format of the information.
- Owner-shipper statement is the same information that has been traditionally collected from producers.
- Alternative documents that serve the needs of animal health traceability should be available.
- It is harder to know what animals are coming into a state than animals leaving a state.
- The fact that an ICVI must be signed by a veterinarian, and in some regions of the country veterinarians are not always available, brings forth the question if a document that does not require a veterinarian's signature should be developed.
- ADT will be implemented one step at a time. First steps will be perfected before the industry moves to future steps.
- Outreach and education is a universal need, with terminology defined and put in words and terms that participants can understand.
- While commerce may not be as smooth without consensus, commerce will continue nevertheless.

When ADT Forum participants were posed the question "In your eyes, how well is ADT implementation going?", the result was a rating of 2.5 out of 5. Responses to "Why did you give this rating?" showed that different issues are important on a local level.³¹

MAJOR PRIORITIES

The forum concluded with an opportunity for all attendees to identify barriers or solutions to implementation based on their unique perspective as animal health officials, producers, practicing veterinarians and USDA officials. As the process moves forward, it is critical that each of these issues is given careful and thorough consideration in order to efficiently and effectively implement ADT.

Attendees were asked to volunteer specific challenges, concerns or opportunities that they will face in their respective disciplines. General themes were identified as priorities.

Major priorities identified by Forum participants include:

- **Regional collaboration.**
Regional collaboration was a central theme during many of the discussions. Animal health officials should work quickly to develop neighboring-state agreements, in particular where there are common goals and common challenges.
- **Consistency of implementation.**
States are moving at different speeds to fully implement ADT, including their intrastate requirements, and some of the Federal requirements are being interpreted differently.
- **Variability in health regulations from state to state.**
States have specific health issues that have been addressed by regulation or legislation, and these may cause industry to have the impression that some States are implementing ADT differently. In some cases, however, States are actually enforcing existing state rules that were in place prior to the Federal traceability requirements.
- **Access to clear state health rules in one location.**
A user-friendly system that quickly accesses current animal health regulations is not readily available. Frequently, veterinarians are tasked with calling state health officials for current information, and this is problematic at off-hours/weekends. The strong suggestion was to have a site that links to State regulations that clearly outlines animal health requirements by state and is easily accessible for all veterinarians and producers.
- **Understanding the rule.**
With a significant number of producers and practicing veterinarians lacking an understanding of the rule, a strong, effective outreach program to both sectors is essential.
- **Availability, cost and access of veterinary services.**
In many areas, access to accredited veterinarians to prepare/submit ICVIs is becoming increasingly problematic.
- **Funding.**
All segments identified limited federal funding and reduced state support as a significant barrier to implementation. In many cases, state animal health officials reported specific evidence of reduced state staff, loss of resources and general loss of revenue to effectively implement ADT.
- **Producer concerns.**
Producers are concerned that the cost of implementation will fall directly on the producer segment, and potentially disproportionately on the auction yard segment. Full implementation could slow the speed of commerce, or actually impede commerce in general. In other words, if the barriers to entry in a specific state are too difficult, buyers/sellers may intentionally ignore

commerce with that state. Impeding commerce seemed to be a general theme when manual recording of individual identifications on ICVIs is required.

- **Technology.**
While technology exists to improve the system, there was continued discussion regarding electronic vs. handwritten records. Three questions of concern: Where is the electronic repository? Is it consistent? Is it easily accessible?
- **Dairy steer identification.**
The Federal rule only requires that a dairy steer has an official identification and an ICVI for transport across state lines. However, many states are requiring listing official identification on the ICVI for each animal. While this is the right of each state, it impedes commerce, adds cost and is difficult to accomplish with the reducing availability of veterinarians.
- **ICVI is becoming an identification document.**
Concern was expressed by some veterinarians that so much time is focused on capturing identification information that the ICVI is becoming less effective as a health tool.
- **Utilization of existing industry data.**
Electronic data is being captured with electronic tags with the manufacturer code (i.e. 982, 985, etc). However, for a variety of reasons, this data is not currently available for animal disease traceability.
- **Dairy and other industry differences.**
It was clear that the primary concerns to implementation are from the beef industry because of the extensive nature (i.e. range, comparatively low-tech operations) of that business. On the other hand, most dairy producers are more willing—and already do—collect individual animal data. Similarly, swine has a large-scale, efficient tracking system in place, and sheep and goats have leveraged the scrapie program to enhance traceability.
- **Value to producers.**
It is essential to develop a message that shows the value of ADT to producers.

SUMMARY

The ADT program in the United States is a process and will continue to evolve over time. Variables among States and Tribes that are problematic today can, and will be, resolved.³²

Industry will drive identification technology advancements, and APHIS will align with the advancements made by industry.³³

While there will be differences among State, the Federal ADT rule is in place and animal agriculture does not want to change the Federal rule.³⁴

Positive progress for animal traceability has been made to varying degrees across the country. It is important for states and industry to continue to dialogue to develop solutions for issues identified during the forum. The ultimate goal is for the United States to have an effective animal health traceability system.

FORUM PRESENTATIONS, SPEAKERS

“A Case for Transparency: The Media, the Public and You,” Andy Vance, Staff Editor, *Feedstuffs Magazine*

“Protecting American Agriculture,” Dr. John Clifford, Deputy Administrator and Chief Veterinary Officer, *USDA APHIS Veterinary Services*

“Identifying Areas in Which Consistency and Harmonization Must be Achieved among States and Industry,” Dr. Tony Forshey, *Ohio Department of Agriculture*, and Dr. Tony Frazier, *Alabama Department of Agriculture and Industries*

“Identifying Areas in Which Consistency and Harmonization Must be Achieved Among States and Industry” panel moderated by Dr. Steve Halstead, *Michigan Department of Agriculture and Rural Development*

“Implications for Livestock Markets,” Chelsea Good, Vice President, Government and Industry Affairs, *Livestock Marketing Association*

“Data Management Partnerships: Livestock Commerce in a Reportable Disease Impacted Environment,” Dr. Steve Halstead, *Michigan Department of Agriculture and Rural Development*

“Brand State Considerations,” Dr. Dave Fly, *New Mexico State Veterinarian*

“Development of Owner/Shipper Statement MOUs for Interstate Movement,” Dr. Stephen K. Crawford, *New Hampshire State Veterinarian*

“Data Standards & Technology Considerations to Implement ADT,” John Picanso, Chief Information Officer, *USDA APHIS VS*

“Equine Movements,” Dr. Charlie Hatcher, *Tennessee Department of Agriculture*

“Collection of Identification at Harvest,” Dr. Maria Esteras, Supervisory Enforcement, Investigations and Analysis Officer, *USDA Office of Field Operations Food and Safety Inspection Services*

“Aquaculture and Traceability,” Dr. Tony Forshey, *Ohio Department of Agriculture*

“Implications for Livestock Used for Rodeos,” Cindy Schonholtz, Director of Industry Outreach, *Professional Rodeo Cowboys Association*, and Dr. Doug Corey, Chair, Livestock Welfare Committee, *Professional Rodeo Cowboys Association*

“Implications for Fairs and Expositions,” Jim Tucker, Chief Executive Officer, *International Association of Fairs and Expositions*

“ADT Outreach and Education” panel moderated by Dr. Nevil Speer, *Western Kentucky University*

Veterinarians – Dr. Ken Newens, *Colorado Department of Agriculture*

Dairy – Betsy Flores, *National Milk Producers Federation*

Beef – Dr. Jack Whittier, *National Cattlemen’s Beef Association member and Colorado State University, Animal Science Department*

Swine – Dr. Patrick Webb, *National Pork Board*

Small Ruminants – Peter Orwick, *American Sheep Industry Association*

Aquatic Livestock – Dr. Tony Forshey, *Ohio Department of Agriculture*

Markets and Transporters – Chuck Adami, *National Livestock Producers Association*, and Roy Barta, *Livestock Marketing Association*

Reaction Breakouts sessions were moderated by Dr. Tony Frazier, State Veterinarian, *Alabama Department of Agriculture and Industries*, and Dr. Dale Blasi, Professor/Extension Specialist, *Kansas State University*

Enumeration of Major Points of Consensus and Points of Discord were facilitated by John Maday, *Drovers Journal* and *Bovine Veterinarian*, and Wes Ishmael, *BEEF magazine*

Development of Consensus on Consistency and Harmonization of ADT Final Rule Compliance—Facilitated by Dr. Dave Daley, *Chico State University*

Wrap-up Comments were delivered by Dr. Annette Jones, Board Chair, *National Institute for Animal Agriculture*, and Dr. Stephen Crawford, President-elect, *U.S. Animal Health Association*

CONTACT INFORMATION

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FOOTNOTES

¹ Vance, Andy. "A Case for Transparency: The Media, the Public and You," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 6, 2013.

² Vance, Andy.

^{3, 4, 5} Clifford, John. "Protecting American Agriculture," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 6, 2013.

⁶ Estras, Maria. "Collection of Identification at Harvest," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 6, 2013.

⁷ Clifford, John and Estras, Maria.

^{8, 9, 10} Clifford, John.

¹¹ Forshey, Tony. "Identifying Areas in Which Consistency and Harmonization Must be Achieved among States and Industry," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 6, 2013.

¹² Schonholtz, Cindy. "Implications for Livestock Used for Rodeo, Fairs & Exhibitions," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

¹³ Corey, Doug. "Implications for Livestock Used for Rodeo, Fairs & Exhibitions," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

¹⁴ Vance, Andy.

¹⁵ Newens, Ken. "ADT Outreach & Education," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

¹⁶ Adami, Chuck and Barta, Roy. "ADT Outreach & Education," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

¹⁷ Good, Chelsea. Discussion during National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

¹⁸ Flores, Betsy. "ADT Outreach & Education," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

^{19, 20} Whittier, Jack. "ADT Outreach & Education," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

^{21, 22} Webb, Patrick. "ADT Outreach & Education," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

^{23, 24, 25} Clifford, John.

^{26, 27, 28} Discussion during "Identifying Areas in Which Consistency and Harmonization Must be Achieved Among States and Industry," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy

Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 6, 2013.

^{29,30} Blasi, Dale. "Technology Applications and Consistency," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 6, 2013.

³¹ Daley, Dave. "Development of Consensus on Consistency and Harmonization of ADT Final Rule Compliance," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

^{32,33} Clifford, John.

³⁴ Discussion during "Development of Consensus on Consistency and Harmonization of ADT Final Rule Compliance," National Institute for Animal Health and U.S. Animal Health Association Joint Strategy Forum on Animal Disease Traceability, Bringing Industry and Regulatory Leaders Together to Create Sensible Solutions, Denver, Colorado, August 7, 2013.

ADDENDUMS

Addendum 1: The Federal Rule

Addendum 2: Summary of survey conducted July 2013 by the U.S. Animal Health Association (USAHA), National Institute for Animal Agriculture (NIAA), USDA, and Livestock Marketing Association (LMA).

Addendum 3: Full results of survey conducted July 2013 by the U.S. Animal Health Association (USAHA), National Institute for Animal Agriculture (NIAA), USDA, and Livestock Marketing Association (LMA).