


# Joint Strategy Forum on Animal Disease Traceability

*Bringing Industry and Regulatory Leaders  
Together To Create Sensible Solutions*

Co-Hosted by:



RENAISSANCE  
DENVER HOTEL  
DENVER, CO  
AUGUST 30-31, 2010

## White Paper

**Reactions, Solutions and Consensus from the  
Joint Strategy Forum on Animal Disease Traceability  
August 30-31, 2010 – Denver, Colorado**

*Prepared by the National Institute for Animal Agriculture  
and the United States Animal Health Association*

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***This White Paper was written to capture important discussions during the Joint Forum on Animal Disease Traceability held August 30-31, 2010 in Denver, CO. It is not intended to convey any particular position of NIAA, USAHA, or any of the participating individuals or organizations; but rather to document major points of consensus that were reached during the Forum.***

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# 1. Executive Summary

The Joint Strategy Forum on Animal Disease Traceability (Forum) was collaboratively developed by the National Institute for Animal Agriculture and the United States Animal Health Association and was held August 30-31, 2010 in Denver, Colorado.

The National Institute for Animal Agriculture (NIAA) is a non-profit, membership-driven organization that unites and advances animal agriculture: the beef, dairy, equine, goat, poultry, sheep and swine industries. NIAA is dedicated to programs that work toward the eradication of diseases that pose risk to the health of animals, wildlife and humans; promote a safe and wholesome food supply for our nation and abroad; and promote best practices in environmental stewardship, animal health and well-being. Farmers, ranchers, veterinarians, scientists, state and federal officials and business executives comprise NIAA's membership.

The U.S. Animal Health Association (USAHA), this nation's animal health forum for over a century, is a science-based, dues-supported, voluntary organization whose membership includes state, federal and international animal and public health agencies, allied industry and professional organizations, as well as individual members representing academia, animal owners and animal health professionals. USAHA primarily serves as a forum for communication and coordination among animal health constituents on issues of animal health and disease control, animal welfare, food safety and public health. USAHA operates with 32 species- and subject-oriented committees, and hosts an annual meeting each year with the American Association of Veterinary Laboratory Diagnosticians.

The Planning Committee for the Forum endeavored to create an environment in which industry participants, state animal health officials, tribal animal health officials, and representatives from the Veterinary Services area of USDA's Animal and Plant Health Inspection Service could openly discuss the issues and potential solutions to help further develop robust animal disease traceability in the U.S.

Attending the Forum were 193 individuals representing 43 states, 4 tribes, 33 state animal health agencies, 38 industry organizations, 8 universities, and 34 animal producers and supply companies. In addition, representatives from Canada, Mexico, and Japan were among the attendees.

As determined by the breakout session participation during the Forum, it was estimated that 85% of the participants were interested in cattle traceability, and the remaining 15% were interested in traceability as it relates to swine, sheep and goats, equine, poultry, and exotic species.

Although efforts to develop animal identification methods and systems to provide traceability have been underway for several years, issues such as data confidentiality, system costs, a lack of understanding of device and reader technology, and a lack of standardization has led to frustration

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and pushback from producers. During February 2010, USDA announced a new, flexible framework for animal disease traceability in the United States. The framework is projected to provide the basic tenets of an improved animal disease traceability capability in the United States. USDA suggests it will:

- Only apply to animals moved in interstate commerce;
- Be administered by the States and Tribal Nations to provide more flexibility;
- Encourage the use of lower-cost technology; and
- Be implemented transparently through federal regulations and the full rulemaking process.

Following the announcement of the new direction, State and Tribal animal health officials, through a Traceability Regulation Working Group (TRWG), have been developing the basic tenants of the new traceability framework. It is anticipated that USDA will draft a proposed rule on animal disease traceability which will be published by April, 2011 and provide for a 60-90 day public comment period.

## Forum Outcomes

The focus of the Forum was on the preliminary directions the TRWG are suggesting in the areas of official identification, exemptions, performance standards, compliance components, recordkeeping requirements, and proposed timelines. Through a preliminary prioritization exercise, it was determined the greatest interest and concern were in the following areas:

- Recordkeeping requirements of official ID
- Proposed official ID to be allowed for interstate movement
- Traceability performance standards
- Compliance components

In addition, there was significant interest in these areas as they specifically relate to feeder cattle as well as enforcement of the program.

As discussion progressed over the two-day Forum, the following points of consensus were reached:

- 1. There is a significant need for more efficient and effective Animal Disease Traceability in the United States.**
- 2. Feeder cattle identification should be required as soon as adequate benchmarks and baselines established indicate that identification of adult animals has been achieved.**
- 3. Inexpensive metal “Brite” tags are acceptable as a form of official identification as a baseline; but the option to use electronic identification shall continue to be allowed.**

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4. Brands (hot iron or freeze) should be allowed as official identification; provided the two states (origin and destination) have agreement regarding movement and that the brand information provides the original point of origin.
  5. Animal Disease Traceability implementation should include separate considerations across species regarding official identification devices and methods.
  6. Interstate Certificates of Veterinary Inspection (ICVIs) should be standardized across all states to improve uniformity of data collected. In addition, enforcement of ICVI requirements and the ability to update ICVI information both need to be enhanced so that minimum data collected and final destination information is accurate.
  7. Backtags for cattle moving directly to slaughter should continue to be considered official identification until a better method to identify such cattle is developed. The framework was designed to build on existing systems that are workable; there was general agreement that the backtag system is a workable, efficient system that is widely utilized in commerce.
  8. Official eartags with the “840” country code should continue to be used only for animals born in the U.S.
  9. Concise and accurate outreach and education for animal producers, handlers, marketers and processors regarding the new requirements under the Animal Disease Traceability framework must be a top priority.
  10. Terminology regarding a state’s progress in implementing animal disease traceability should be defined to better convey the progress towards complete implementation, rather than its “status.”
  11. Identification of fed cattle moving directly to slaughter should be delayed until two years after all feeder cattle are required to be identified.
  12. Successful Animal Disease Traceability must include strong and ongoing collaboration among producers, commercial interests and regulatory agencies at both the state and federal level.

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## 2. Purpose and Design of the Forum

The purpose of the Joint Strategy Forum on Animal Disease Traceability was to provide an environment for all interested producers, producer groups, State and Tribal animal health officials, and representatives of USDA’s Veterinary Services have an open and candid dialogue on the various issues surrounding the new framework for animal disease traceability. Although USDA held several public meetings on the new framework during the spring and summer of 2010, the Forum was the only gathering which was directed by the industry and state/tribal animal health officials and worked from an agenda developed to elicit concerns, questions, and propose viable solutions.

*“It has been announced by USDA that they intend to publish new rules on disease traceability this winter, which makes this Forum crucial in conveying input before the rule is complete,” stated Dr. Michael Coe, co-chair of the Forum Planning Committee. “Given that timeline, industry and the States and Tribes need to make their positions known to decision-makers.”*

As stated by Dr. Richard Breitmeyer, California’s state veterinarian as well as the current president of USAHA, at the beginning of the event, “this Forum will allow for the open flow of ideas and concerns among those producing animals; State and Tribal officials responsible for protecting the health of animals in their areas; and USDA. Unless we have a discussion including all parties, the development of a viable animal disease traceability framework will be much more difficult.”

The Forum Planning Committee was comprised of leadership from both NIAA and USAHA, animal identification leaders from both organizations, and a USDA representative.

### **Forum Planning Committee**

Co-chair: Dr. Michael Coe, Co-Chair, NIAA Animal Identification and Info. Systems Committee  
Co-chair: Dr. Bill Hartmann, Treasurer, USAHA and Minnesota State Veterinarian

Dr. Richard Breitmeyer, President, USAHA and California State Veterinarian  
Dr. Robert Fourdraine, Chairman, NIAA  
Dr. Tony Forshey, Chair, USAHA Livestock Identification Committee and Ohio State Veterinarian  
Mr. Kevin Maher, Vice Chair, USAHA Livestock Identification Committee  
Mr. Victor Velez, Co-Chair, NIAA Animal Identification and Information Systems Committee  
Mr. Glenn Fischer, Treasurer, NIAA  
Mr. Neil Hammerschmidt, Traceability Program Staff, USDA Veterinary Services  
Mr. Ben Richey, Executive Director, USAHA  
Mr. Scott Stuart, Managing Director, NIAA

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The agenda for the Forum was developed in a manner that would provide the most current information on the Animal Disease Traceability framework; elicit reaction from the various species and segment groups represented; identify potential solutions to issues raised; as well as develop and document points of consensus. Facilitators for the Forum were selected based on their knowledge and experience within animal identification and traceability, as well as their demonstrated ability to facilitate discussion among a diverse group of interested participants. The following is the Agenda used during the Forum:

### **Monday, August 30**

- 1:00 p.m. Welcome and Purpose of Forum**  
Dr. Richard Breitmeyer, President, U.S. Animal Health Association  
Dr. Robert Fourdraine, Chairman, National Institute for Animal Agriculture
- 1:10 p.m. Update on Animal Disease Traceability Framework**  
Dr. John Clifford, Chief Veterinarian, USDA / APHIS
- 1:40 p.m. Progress Report: Animal Disease Traceability Working Group**  
Dr. Keith Roehr, State Veterinarian, Colorado Dept. of Agriculture
- 2:10 p.m. State Veterinarians' Update**  
Dr. Guy Hohenhaus, President, National Assembly
- 2:40 p.m. Q & A on USDA / Working Group Updates**
- 3:30 p.m. Reaction Breakouts**
- I. Cattle (Cow/Calf, Stockers, Feeders, Markets, Packers, Dairy)**  
Facilitated by: Dr. Nevil Speer, Western Kentucky University
- II. Swine, Sheep, Goats, Equine, Poultry**  
Facilitated by: Dr. Patrick Webb, National Pork Board
- 5:30 – 7:00 p.m. ADT Forum Reception**

### **Tuesday, August 31**

- 8:00 a.m. Presentations by Representatives of Breakout Groups**
- 9:45 a.m. Facilitated Interactive Session to Discuss Solutions**  
Facilitated by: Dr. Dave Daley, Chico State University
- 12:15 p.m. Facilitated Interactive Session to Discuss Consensus Points**  
Facilitated by: Mr. Wes Ishmael, BEEF Magazine  
Mr. John Maday, Drivers Journal
- 2:00 p.m. ADT Forum Concludes**

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### 3. Industry / State Reaction to Current Thinking

The prioritization of the issues that were focused on during the Forum was accomplished by use of a survey of the participants following the Update and Current Thinking Session. The participants were asked to identify the top three concerns they had with the “current thinking” of the Traceability Regulation Working Group (TRWG) as provided in the documents provided by USDA and attached as Appendices I-III, pp. 26-65). The survey included the following items:

1. Proposed official ID to be allowed for Interstate Transportation
2. Cattle to be Identified Step I
3. Proposed Exemptions in Step I
4. Cattle to be Identified Step II
5. Proposed Exemptions in Step II
6. Traceability Performance Standards
7. Compliance components
8. Levels of Compliance (Status is by Species)
9. Recordkeeping Requirements of official ID
10. Timeline for Rulemaking and Implementation
11. Other Issues (Please list)

Once the survey was tabulated, the following issue areas were identified, in order of importance, as being of greatest concern and interest to the participants representing cattle concerns:

- 1. Recordkeeping requirements of official identification**
- 2. Proposed official identification to be allowed for interstate movement**
- 3. Traceability performance standards**
- 4. Compliance components**

(Also identified as key issues were all of the aforementioned areas as related to feeder cattle, as well as enforcement of the animal disease traceability program requirements.)

The participants representing other species (swine, sheep & goats, equine, poultry, and exotic species) were most interested in discussing:

- 1. Proposed official identification to be allowed for interstate movement**
- 2. Traceability Performance Standards**
- 3. Compliance components**
- 4. Recordkeeping Requirements of official identification**

The Cattle Reaction Session was facilitated by Dr. Nevil Speer, Western Kentucky University, and the Other Species Reaction Session was facilitated by Dr. Patrick Webb, National Pork Board.



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## 4. Industry / State Reaction to Current Thinking (Cattle Session)

### Recordkeeping requirements of official Identification (Cattle Session):

Discussion regarding recordkeeping requirements proposed in the current proposal elicited several comments about Interstate Certificates of Veterinary Inspection (ICVIs).

Reactions:

- “Electronic ICVIs are more efficient; paper certificates do not always get transferred into an electronically formatted record.”
- “What is the status of ICVI software? Two systems are in place; the Veterinary Services Process Streamlining (VSPS) system, and the GlobalVetLink (GVL) system; however concern was raised as to the lack of compatibility of the two systems.”
- “Electronic certificates are the way to go; however in the meantime we must find better ways to continue to use the paper certificate system we have today.”
- “How is recordkeeping accomplished for animals that already have official identification? In South Dakota all official identification on breeding cattle are read in markets and entered on the 454 forms by accredited veterinarians; it can be done, but it will take a different frame of mind.”
- “Number of accredited veterinarians is dwindling; how is it going to be possible to encourage more recordkeeping?”
- “In Arkansas, Livestock Inspectors write down ID on all breeding cattle; it will be a different story if feeder cattle are required to be recorded; paper records are stored in boxes and will not be readily accessible.”
- “Is the veterinarian who applies official identification required to maintain records for five years?” Only shipper and state is required to do so according to USDA.
- Electronic ICVIs are good; but not always possible.”
- “Five year maintenance of records; what about older animals? Producers are not going to like having to maintain records for five years; expect many comments from producers!”

*“Five year maintenance of records; what about older animals? Producers are not going to like having to maintain records for five years; expect many comments from producers!”*

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## **Proposed official identification to be allowed for interstate movement (Cattle Session):**

The issue of identifying cattle with official identification elicited a spirited discussion among the industry participants at the Forum.

Reactions:

- “Why is the rule allowing the ‘840’ number to be used in only U.S. animals being rescinded?” *(It is challenging to retag a Canadian animal that has lost its tag; it’s not practical to maintain different tags specifically for foreign born animals according to USDA.)*
- “Flexibility is needed in the timeframes moving from Step I to Step II; time is needed to get the kinks out of the system.”
- “What became of the orange RFID Bangs tag?” This is an option that can be used; however a regulation in the CFR would need to be included setting aside the color orange for designation as a 840 coded RFID Bangs tag.
- “If a second official identification device is applied, it must be cross-referenced to the original device.”
- “The ad hoc Cattle ID Group, made up of a broad-based group of cattle organizations, provided USDA/States direction on feeder cattle issue; what is and is not possible at this time due to economics, willingness of producers, and from a political perspective. Tagging feeder cattle is not feasible until adult animals are done and the kinks are worked out of the system. The feeder cattle issue is big; it is not feasible to require that within one year they are required to be tagged. It is very important that industry support the program for success to be achieved!”
- “Special consideration is needed regarding feeders; one year is too short!”
- “The ADT plan makes sense; feeders should be identified since TB testing can be caused by unidentified feeders moving into an area. Feeders should be ID’d when they are normally worked and vaccinated.”
- “Is there added liability created by allowing producers to apply Brite tags?” *It is up to the state as to how tags are distributed; there should be no liability unless a producer gives his tags to a neighbor to use, according to USDA.*
- “Slaughter cattle moving out of state need a tag; but what about those that stay in the state?” *According to USDA, owner/buyer and transporter are responsible for ensuring cattle are identified.*
- “Current Backtags are a good form of ID; don’t throw out this option. If cows need to be ID’d at market, it could severely diminish value of cow if further stressed.”

***“Want more ID on livestock; but 3-5 years needed before feeders are included. The industry will drive feeder ID.”***

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- In Arkansas, all tags are read at the salebarns; Backtags are a backup. Don't want to turn over Brite tags to producers; official tags only by officials."
  - "Want more ID on livestock; but 3-5 years needed before feeders are included. The industry will drive feeder ID."
  - "Desire among producers to obtain Brite tags is less than for tags that can also be used in management systems (i.e. 840 visual tags); State import requirements may drive ID of feeders."
  - "There are not enough accredited veterinarians in the country to ID all animals; must trust producers."

### **Traceability performance standards (Cattle Session):**

Discussions surrounding the issue of traceability performance standards revisited many of the issues which were also discussed within the proposed official identification reaction.

Reactions:

- "Are exemptions for slaughter cattle valid after Step I is completed?" USDA indicated that there would be a phased-in elimination of the Backtags for slaughter cattle.
- "28 million head of cattle are sold through auctions in one year; [approximately 7 million are currently required to be identified] if feeders are required to be tagged an additional 21 million cattle will be added to traceability in one year. We need more time on feeder cattle; at least enough time to see how the new rules work on adult cattle."
- "It is not good to put fed or slaughter cattle through the chute to apply eartags."
- "Support more time for feeders; set phase-in to Step II based on performance standards met in Step I. Don't keep making changes or you will lose credibility; you need to know industry is on your side."
- "Brite tags are a concern; state code and ZIP codes should be used. Inform producers that [required] feeder cattle identification is coming; set a date; and they'll start tagging sooner."
- "Communication about the new rule is important; but adequate time is very important!"

***"Communication about the new rule is important; but adequate time is very important!"***

### **Compliance components (Cattle Session):**

As for the components regarding compliance by States/Tribes and producers, it was suggested that administration of tags could be a significant issue due to the shortage of accredited veterinarians.

Reactions:

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- “We will have problems with additional tags being administered by accredited veterinarians instead of reading tags that have already been applied; auctions will do what needs to be done”
  - “Will collected identification devices be correlated to carcasses? It could be a food safety concern if ID is bagged with the carcass until it clears inspection. Education will be needed on ID requirements; outreach is necessary.”
  - “Veterinary accreditation program education will assist [in providing compliance requirements to veterinarians].”
  - “If current requirements can’t be met, won’t additional requirements eventually hurt producers?”
  - “Not fair to heap more requirements; process will need to be worked out; 2 to 3 levels of status helped in Scrapie; not the intent to push a state into a lower status situation.”
  - “Tired of accredited veterinarians being responsible for ICVIs and not providing accurate information; enforcement of penalties needed to stop falsification of ICVIs.”
  - “Unless funding is available; progress should not be made.”
  - “Consider ramifications of not having a traceability system as compared to the cost of the system; more testing required if traceability not in place; not a lot of burden placed on producers with current ADT approach; cost to industry will be high if traceability not in place; this is the same system that has been used successfully in other disease eradication programs; food safety issue is on our heels; Secretary stated ADT will not be an unfunded mandate.”
  - State status: Getting rid of current state status structure, were there discussions of other accountability measures?”
  - “What’s a better term? Suggestions needed. Not as prescriptive as current “status” definition.”

*“Consider the ramifications of not having a traceability system as compared to the cost of the system.”*

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## 5. Industry / State Reaction to Current Thinking (Swine, Sheep & Goats, Equine, Poultry, and Exotic Species)

### **Proposed official identification to be allowed for interstate movement (Other Species Session):**

There was an overall theme of a gap to encourage producers of varying sizes to understand the value of participating in a traceability program, with issues that are not on their radar.

Reactions:

- Equine – “Challenge with less surveillance=less identification as diseases are reduced. True for all species. How does this transition to a traceability program; and how can that be implemented in a meaningful timeframe with options acceptable to the equine industry?”
- Poultry – “National Poultry Improvement Plan (NPIP) is working well; Live Bird Markets (LBMs) still an issue; exhibitors on the other hand looking for more consistency across states, shows. Testing is important component for these.”
- Sheep and Goats – “Biggest challenge is convincing producers to participate in Scrapie program or get TB or brucellosis tests when prevalence is low, and cost is not effective vs. value of animal.” “Flexibility for species-specific approach; ID methods that suit the current practices.”
- Swine – “How can the industry move forward with a more prescriptive program than what is currently in the CFR?”

*“Flexibility for species-specific approach; ID methods that suit the current practices.”*

### **Traceability Performance Standards (Other Species Session):**

Reactions:

- “Status – TB / Brucellosis; moving away from, but will need to be more prescriptive to approaching the new Traceability Status for states/tribes. Is this a step backwards?”
- “The term “Status” should be either changed or very clearly defined, so as not to confuse with disease status. (Level, Stage, Phase, etc.)”
- “Each species needs its own “status” standards, depending on what works within that species and its different sectors.”
- “Engage with industry very carefully about what systems that will work, specifically for unique industries. For example, poultry, nearly impractical to identify individual animals; or

*Each species needs its own “status” standards, depending on what works within that species and its different sectors.”*

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consider aquaculture. Discussion needs to be taking place now so that it can be implemented down the road.”

- “Status can result in added requirements for those that may not be able to change a situation, how should that be handled. Burden should not be on those producers that are complying.”
- “How well are states and tribes able to comply with program standards? Who determines that compliance? USDA? States and Tribes? Industry? USAHA/NIAA?”
- “PRV [Pseudorabies Control Board] model as a possibility.”

### **Compliance components (Other Species Session):**

Reactions:

- “Current ICVI system will not work for new framework; States already behind on entry.”
- “Need for electronic technology; Viable – consider technology acceptance.”
- “Centered on Disease Risk as basis for enforcement; How can this be accomplished with current budgets?”
- “How can we better define responsibility for compliance for Veterinarians and Producers?”
- “Education of regulations is important both with producers and accreditation; Purpose of ICVIs needs to be stressed to producers.”

*“Education of regulations is important both with producers and accreditation; Purpose of ICVIs needs to be stressed to producers.”*

### **Recordkeeping Requirements of official ID (Other Species Session):**

Reactions:

- “What expectations will there be of marketing agencies that collect customer information and keeps it proprietary? (Premises ID numbers required at slaughter).”
- “Define further: ‘Federal Pre-emption’; need written definitions distributed.”

*“Define further: ‘Federal Pre-emption’; need written definitions distributed.”*

### **Additional topics (Other Species Session):**

- “Differences in husbandry practices, disease risk for different species classes.”
- “Will USDA provide an ID system to states for compliance issues?”
- “Define collection or recording of official ID at harvest?”

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### **Additional Questions / Reactions (Combined Species):**

After having had the opportunity to further consider key aspects of the proposed framework for animal disease traceability, the following questions and issues were raised:

- “Why do producers need to maintain records for 5 years?”
  - Some references in CFR for 2 years; some for 5
  - 5 years is needed to provide adequate traceback
  - But producer does not get a copy of the ICVI; will additional copies need to be generated? More discussion needed.
- “Is using paper ICVI for traceback effective?”
  - Destination on ICVI is not always accurate; may be owner’s address, not destination.
  - Truckers may not always know where animals’ final destination is (until they’re already on the road with the load of cattle).
  - Lag time in receiving ICVIs after trace is initiated (up to 30-60 days).
  - Record in-state movements (South Dakota); require entry permit – ICVI veterinarian must call SD to provide information and destination. Looking at allowing electronic ICVIs in lieu of permit.
  - Paper ICVI not effective since destination information changes frequently.
  - 5 years may be good for cattle, but too long for other species (swine). Should be species-specific.
- Has the Traceability Regulation Working Group considered or worked on revamping ICVIs?
  - Need to standardize ICVIs and work toward e-ICVIs. GVL doing good work. VSPS – has been responsive.
  - Need to look closely at cattle destinations changing; industry and regulatory need to work on this issue.
- Will higher commissions / accredited veterinarian / brand inspectors’ fees need to be increased as a result of new ADT?
  - Veterinarians will need to increase fees to make calls for ID.
  - Call-out fees for brand states already; if not a special trip, fees will be minimal.
  - If required to record all numbers on animals when writing ICVI, significant increase in cost; need to look at cost-benefit of recording numbers on ICVIs; unless in retrievable format (i.e. electronic), benefit is minimal.
  - Most ICVIs do not record animal ID; additional tags are applied by veterinarians instead of reading official tags.

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- If numbers are not recorded on ICVIs, they become useless
  - All adult cattle get a Brite tag if they don't already get one - \$2.50/head to record; animal handling issue increased if backtags not allowed.
  - Additional \$2.00/head chute fee to read/record ID; additional stress/mortality could increase costs significantly; cost of having veterinarians on call to address cattle shipments around the clock; \$25 per load?
  - Markets compete with each other; will all markets and packers be required to do the same thing?
  - USDA – Receiving facility needs to ensure animals are identified– would like to retire tags, so current requirements need to be enforced.
  - If cattle reach packer unidentified, what needs to be done?
    - Record animals that were not identified and additional information as to where they came from, etc. should be maintained.
  - 50 states / 50 systems; how will this be avoided?
    - May be 50 state systems, but not 50 different requirements; if official ID is on animals, they should be able to move to any state.
    - Need to talk to neighbor states about “regional concepts”; need to partner with other states.
    - Goal is to have standardization; need to be compatible.
    - Mimicked USDA system to make sure system was/is consistent; Cost should be measured in relation to not having a system – it could be huge.



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## 6. Solutions Session

The Solutions Session, facilitated by Dr. Dave Daley, California State University at Chico, focused on providing an array of potential solutions to the issues raised during the Reaction Sessions. The following is a synopsis of the issues raised and the potential solutions that were suggested.

### **Issue: Education / Outreach.**

#### **Potential Solutions:**

- Step-by-step instructions for all levels in industry must be provided and tailored to each segment.
- Producers do not want a book; keep the messages and instructions simple.
- USDA should run drafts of materials by industry organizations before use; test market them.
- Need to capitalize on outlets – industry organizations and other outlets - each segment/species risks and intricacies must be respected and communicated.
- Define audiences that need information; Segment messaging for producers / regulatory / academia / etc. to make most effective.
- Public relations program; test implementation with key producers and use testimonials, etc.
- AABP willing to educate their members; several opportunities to reach their members.
- Pork: AASV able to reach some producers; need to transition from education to Best Management Practices; must be mandatory (ID) at some point.
- Must be conveyed that Animal Disease Traceability is a BENEFIT to producers; use extension.
- Develop Q&A from producers' viewpoints.
- State-by-state messages; implementation will be done at state levels
- Two-fold approach needed: National and State level.
- Need to be cautious when to begin; have to have messages that don't change; (i.e. NAIS)
- Use "learnings" from other countries / states when moving forward.
- USAHA – Forum productive in that good cross-section of regulatory and industry in the same room.

*Producers do not want a book; keep the messages and instructions simple.*

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**Issue: “State Status” definition.**

**Potential Solutions:**

- Terminology needs to be changed; “Progress of Implementation” or “Traceability Tiers” perhaps.
- Mismatch of traceability expectations and current capability; Need to put resources behind expectations
- States/tribes should have agreement in order to support state status or progress of implementation

**Issue: “Cattle health issue is someone else’s problem.”**

**Potential Solutions:**

- Need to sell producers on the benefits; Animal Disease Traceability will make animals more marketable.
- Non-traditional [species] marketing / production chains; different than traditional species; implement species-by-species; cannot be ethereal messages
- Cannot sell as a marketing advantage; different regulations in different states.
- Hard to sell as “good for the market”; make it a “personal” message.
- It’s about “access” to all potential buyers.
- Can’t “sell” to producers; needs to be industry-driven.
- Perception that government may come put me out of business if anything is found.

*“Can’t “sell” to producers; needs to be industry-driven.”*

**Issue: Types of “official” animal ID.**

**Potential Solutions:**

- Brite tags; do not preclude EID; but may shift cost “down the road”
- Backtags: Why phase out? Backtags are not adequate on slaughter-direct animals; but balanced against additional handling of animals which may cause stress and potential injury, it is still a viable option.
- Backtags can be lost; lack of ID causes problems; without permanent ID on animals, traceability is difficult. (Was tag lost, or just not collected?)
- Not the method of ID, but the implementation of the ID method; Need to educate appliciers of backtags as to proper applications.

*“Brite tags; do not preclude EID; but may shift cost down the road.”*

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- Greatest good for the greatest number; what is going to work best? Backtags still a reasonable solution.
  - Brite tags should be put in the hands of the producers as soon as possible; phase-in could begin to occur sooner.
  - Don't forget pork; want to move away from backtag due to retention issues.
  - Some producers do not have handling facilities; burden will fall on markets; implement in increments; Scrapie example – producers still don't always tag sheep.
  - Work with current [dairy] industry programs (i.e. DHIA, breeds, etc).

**Issue: Fed cattle auction identification.**

**Potential Solutions:**

- Tagging fat cattle in a chute will cause problems. (Injury / stress).
- Prefer backtag to Brite tag on custom-fed and/or retained-ownership cattle.

**Issue: Retirement of tags at slaughter.**

**Potential Solutions:**

- Packers struggling with what is being asked.
- If funding exists, tags would be provided by packer to APHIS to enter data into system to retire tags; not talking about retiring all tags, but those that pertain to specific disease issues; focus on adult animals, not feeder animals.
- ALL official ID must be collected; issues need to be addressed between APHIS and FSIS.

***“ALL official ID must be collected; issues need to be addressed between APHIS and FSIS.”***

**Issue: “840” Issue related to USA origin.**

**Potential Solutions:**

- Prefer 840 as USA-origin animal; why is it important to delete that rule?
- There is “investment” in 840 as COOL, etc.; should be reserved as USA designation
- Based on original rule publication, there didn't seem to be much interest; however now there is and it could be left intact.

**Issue: Feeder cattle identification implementation timeline.**

**Solutions:**

- 
- Producers: Delay for 3-5 years; or let's see how Step I goes.
  - Understand that ADT needs to make progress over time; need to develop some benchmarks.

**Issue: Timeline for Feeder Cattle implementation.**

**Solutions:**

- Link implementation dates for feeder cattle to progress of Step I; start getting animals tagged during phase-in periods.
- When Step I is shown to work, it will be much easier to then move to feeders; goals need to be established for Step I.
- Feeder heifers v. breeding heifers; need a clear distinction.
- Education should start ASAP.
- Information sharing should occur; education efforts (grace period) is important
- Other regions need to be heard; regional issues are important.

***“Link implementation dates for feeder cattle to progress of Step I; start getting animals tagged during phase-in periods.”***

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## 7. Consensus Session

Facilitated by Wes Ishmael, contributing editor to BEEF Magazine, and John Maday, managing editor of Drovers, the Consensus Session endeavored to identify and document specific areas of consensus among the diverse group of participant at the Forum. Representing nearly every species and segment of the industry as well as various regulatory levels, the points of consensus reached at the Forum are important in that they represent the views of such a wide array of involvement in the animal industry and animal health community. Following a significant amount of discussion, the following points of consensus were identified:

### Points of Consensus

1. **There is a significant need for more efficient and effective Animal Disease Traceability in the United States.**
2. **Feeder cattle identification should be required as soon as adequate benchmarks and baselines established indicate that identification of adult animals has been achieved.**
3. **Inexpensive metal “Brite” tags are acceptable as a form of official identification as a baseline; but the option to use electronic identification shall continue to be allowed.**
4. **Brands (hot iron or freeze) should be allowed as official identification; provided the two states (origin and destination) have agreement regarding movement and that the brand information provides the original point of origin.**
5. **Animal Disease Traceability implementation should include separate considerations across species regarding official identification devices and methods.**
6. **Interstate Certificates of Veterinary Inspection (ICVIs) should be standardized across all states to improve uniformity of data collected. In addition, enforcement of ICVI requirements and the ability to update ICVI information both need to be enhanced so that minimum data collected and final destination information is accurate.**
7. **Backtags for cattle moving directly to slaughter should continue to be considered official identification until a better method to identify such cattle is developed. The framework was designed to build on existing systems that are workable; there was general agreement that the backtag system is a workable, efficient system that is widely utilized in commerce.**
8. **Official eartags with the “840” country code should continue to be used only for animals born in the U.S.**
9. **Concise and accurate outreach and education for animal producers, handlers, marketers and processors regarding the new requirements under the Animal Disease Traceability framework must be a top priority.**

- 
- 10. Terminology regarding a state's progress in implementing animal disease traceability should be defined to better convey the progress towards complete implementation, rather than its "status."**
  - 11. Identification of fed cattle moving directly to slaughter should be delayed until two years after all feeder cattle are required to be identified.**
  - 12. Successful Animal Disease Traceability must include strong and ongoing collaboration among producers, commercial interests and regulatory agencies at both the state and federal level.**

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## 8. Additional Information

Additional information on the issue of Animal Disease Traceability may be found at the following websites:

<http://animaldiseasetraceability.com/>

<http://www.aphis.usda.gov/traceability/>

<http://animalagriculture.org/Information/Hot%20Topics/Animal%20ID.html>

<http://usaha.org/committees/id/id.shtml>

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## 9. Contact Information

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719-538-8843  
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Benjamin Richey, Executive Director



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# 10. Appendix I

## **Animal Disease Traceability Framework**

### **Overview and Current Thinking**

August 13, 2010

- **The proposed rule to support the new animal disease traceability framework would:**
  - Pertain only to animals that move interstate
  - Be performance and outcome based using traceability performance measures (the preliminary performance standards prepared by the Regulation Working Group on page 2)
  - Require animals moved interstate to be officially identified (individually or by group/lot) and accompanied by an Interstate Certificate of Veterinary Inspection (ICVI), unless otherwise exempt
    - Official identification will be defined in the *Code of Federal Regulations* (CFR) by species providing multiple options while establishing national uniformity
    - Regulations will exempt, or phase in, certain ages and classes of livestock and certain movements
    - States and Tribes may move animals between their geographic areas using other identification options if they agree to do so
      - For example, two brand inspection States may elect to use official brands
  - Provide for an evaluation process to measure State and Tribal tracing capability against the traceability performance standards
  - Provide traceability status designations to reflect State and Tribal tracing performance in comparison to the traceability performance standards (see page 5)
  - Provide options where additional requirements may be imposed for animals moving interstate from States and Tribes that do not achieve the traceability performance standards (see page 5, Traceability Status III)
  
- **The overall success of animal disease traceability would be evaluated and documented through:**
  - Traceability performance standards as defined through the CFR will:
    - Evaluate State and Tribal tracing capability to the traceability performance standards
    - Provide incentives or advantages for achieving the traceability performance standards
  - Compliance factors with regulations and policies, including:
    - Proper administration of official identification devices (e.g., completeness of official identification tag distribution records )
    - Official identification of livestock required to be officially identified per interstate movement regulation
    - Official identification collected at slaughter
    - ICVIs for shipments requiring ICVIs and the completeness of information on the certificates

- State and Tribe traceability cooperative agreement workplans
  - Each cooperator will have an APHIS-approved animal disease traceability plan that thoroughly describes the cooperator’s objectives, including the traceability unit<sup>1</sup>.
  - Federal funding will be provided through annual traceability cooperative agreements that detail implementation strategies supporting the cooperator’s traceability plan.
  - Funding levels will be proportionate with the projected costs of the activities defined in the cooperative agreement and align with achieving and maintaining the State or Tribe’s defined traceability unit.
- **Preliminary Timeline for Rulemaking and Implementation**
  - Proposed rule published approximately April 2011
  - Final rule published approximately 12 to 15 months after publication of proposed rule

### Interstate Traceability Performance Standards

The following table lists performance standards being considered to align with the objectives of an “outcome-based” regulation.

Action	Who Performs	Description	Standard
1. Notify the State/Tribe in which reference animals were officially identified	State/Tribe that received the animal	For animals that are required to be officially identified, how long will it take the receiving State/Tribe to notify the State/Tribe in which the animals were officially identified?	95% notification within 1 business day
2. Identify traceability unit in which reference animals were identified	State/Tribe where the animal was officially identified	For animals that are required to be officially identified, how long will it take the State/Tribe in which the animals were officially identified to specify the traceability unit within which the animals were officially identified?	Initial: 75% within 5 business days  Future: 95% within 2 business days
3. Notify the State/Tribe from which the reference animals were shipped	State/Tribe that received the animal	For animals that are required to be officially identified, how long will it take the receiving State/Tribe to notify the State/Tribe in which the interstate animal movement was initiated?	Initial: 95% within 7 business days  Future: 95% within 3 business days
4. Identify the traceability unit from which the reference animals were shipped	State/Tribe that shipped the animal (may be the same State/Tribe in #2)	For animals that are required to be officially identified, how long will it take the State/Tribe from which the interstate animal movement was initiated to specify the traceability unit from which the shipment was initiated?	Initial: 75% within 5 business days  Future: 95% within 2 business days

<sup>1</sup> The geographical unit to which an animal is required to be identified, as selected by a State or Tribe. The unit may be a State or Tribe, a county, a premises, a site within a premises, or some other unit as determined by the State or Tribe. The unit selected by a State or Tribe could be the smallest unit that the Administrator would initially quarantine in the event of a disease outbreak.

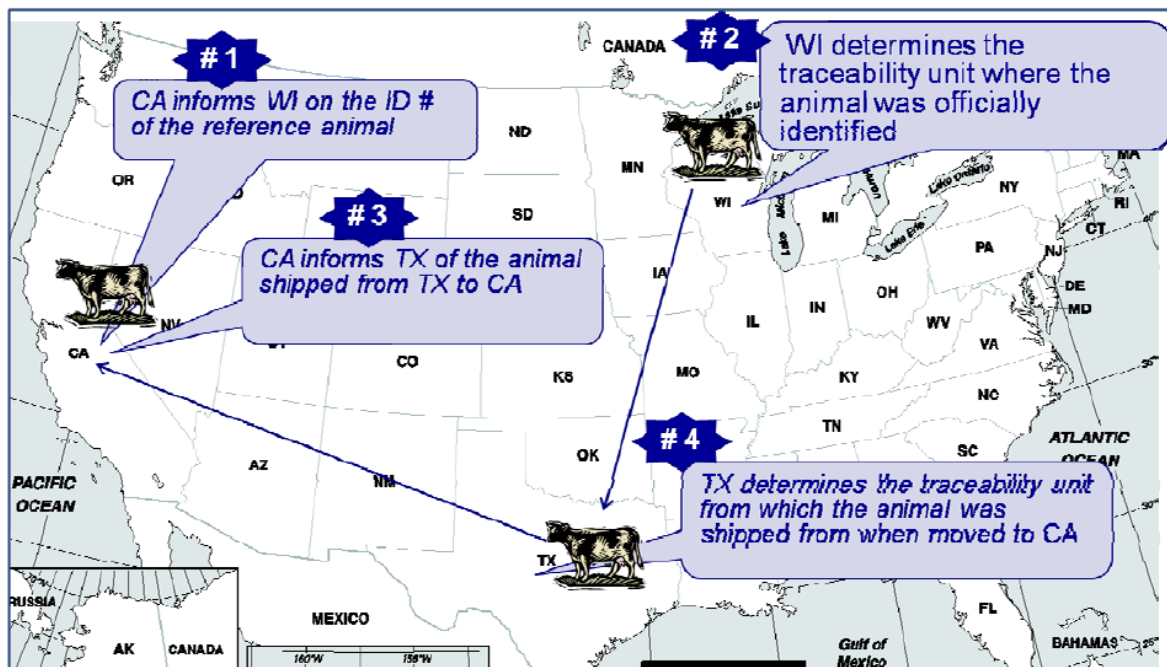
## How would these traceability performance activities be conducted?

For illustrative purposes, let's consider the interstate movement scenario where a dairy cow was shipped from Wisconsin to Texas. The animal had been identified through the Dairy Herd Improvement Association with an 840 tag. Therefore, that identification was used to meet the official identification requirement for interstate movement. The cow was then sold and moved from Texas to California.

The diagram below illustrates the actions these States would take to fulfill the traceability performance standards. In this exercise, California identifies the animal as a reference animal for performance standard measurement purposes.

The following actions reflect how the performance standards align with traceback activity (presented in the numeric order of the performance standards, not necessarily the order the actual tracing events may be conducted).

- Performance Standard #1: California, using the Animal Identification Management System, determines the 840 tag was distributed to Wisconsin and informs Wisconsin of the official identification number of the reference animal.
- Performance Standard #2: Wisconsin determines the traceability unit where the reference animal was officially identified. Again, the Animal Identification Management System should be a good source of that information.
- Performance Standard #3: California informs Texas of the official identification number of the animal shipped from Texas to California.
- Performance Standard #4: Texas determines the traceability unit that the reference animal moved from when shipped to California.



## Implementation of Traceability Requirements - Cattle

The table below summarizes the potential official identification and ICVI requirements for cattle.

Step I: Provides initial exemption to delay the inclusion of feeder cattle and young stock under 18 months of age. Additionally, Step I includes an educational period for several months following publication of the final rule in which producers are informed of regulatory requirements.

Step II: All ages and classes of cattle with remaining exemptions focused on types of interstate movements.

Official Identification		Interstate Certificate of Veterinary Inspection
Step I	Step II	
<p><b>Unless exempt as provided below, official identification required for:</b></p> <ul style="list-style-type: none"> <li>• All dairy cattle</li> <li>• Other sexually intact cattle more than 18 months of age</li> <li>• Cattle used for rodeo and recreational events</li> <li>• Cattle moved to shows or exhibitions</li> </ul>	<p><b>Unless exempt as provided below, official identification required for:</b></p> <ul style="list-style-type: none"> <li>• All cattle</li> </ul>	<p><b>Unless exempt as provided below, ICVIs required for:</b></p> <ul style="list-style-type: none"> <li>• All cattle</li> </ul>
<b>Exemptions to the Official Identification Requirements</b>		<b>Exemptions to the ICVI</b>
<ul style="list-style-type: none"> <li>• Steers or spayed heifer (except if involved in rodeo, recreation, shows, or exhibitions)</li> <li>• Cattle moved directly to slaughter (including through one approved livestock facility; for example, auction/market) with a USDA-approved backtag</li> <li>• Cattle moved to a custom slaughter facility in accordance with State or Federal regulations for preparation of meat for personal consumption</li> <li>• Cattle moved as a commuter herd with a copy of the commuter herd agreement.</li> <li>• Cattle may be moved interstate between any two States/Tribes with other identification methods (other than what is defined as official) as agreed on by animal health officials in those two States/Tribes.</li> </ul>	<ul style="list-style-type: none"> <li>• Cattle moved to a custom slaughter facility in accordance with State or Federal regulations for preparation of meat for personal consumption</li> <li>• Cattle moved as a commuter herd with a copy of the commuter herd agreement</li> <li>• Cattle may be moved interstate between any two States/Tribes with other identification methods (other than what is defined as official), as agreed on by animal health officials in those two States/Tribes.</li> </ul>	<ul style="list-style-type: none"> <li>• Cattle moved direct to slaughter (including through one approved market) and: <ul style="list-style-type: none"> <li>- An owner-shipper statement is required, but individual identification does not need to be recorded for cattle moved from a federally approved livestock facility directly to slaughter.</li> </ul> </li> <li>- Cattle moved directly to an approved livestock facility with an owner-shipper statement that do not move interstate from the facility unless accompanied by an ICVI</li> <li>• Cattle moved from the farm of origin for veterinary medical examination or treatment and returned to the farm of origin without change in ownership</li> <li>• Cattle moved as a commuter herd with a copy of the commuter herd agreement.</li> <li>• Additionally, cattle may be moved between any two States/Tribes with documentation other than an ICVI, as agreed on by animal health officials in those two States/Tribes.</li> </ul>
<b>Other Circumstances when Official Identification Requirements are Waived or Delayed</b>		<b>Recording Official Identification on ICVIs</b>
<ul style="list-style-type: none"> <li>• Cattle may be moved interstate without official identification during transit if destined to an approved tagging site (may be a market/auction barn) and identified before commingling with cattle from other premises.</li> <li>• Cattle moved directly from one State through another State and back to the original State without official identification.</li> </ul>		<p>The recording of official identification numbers would be required for all cattle on the ICVI that require official individual identification other than “feeder” cattle.</p>

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## Traceability Status Designations

APHIS, through collaboration with States and Tribes, will establish and publish a process for evaluating the capability of States and Tribes in comparison to the traceability performance standards. Traceability status will reflect States' and Tribes' ability to meet the traceability performance standards. A separate status will be assigned for each species. The following categories explain the statuses being considered; the label for each status still needs to be determined:

- **Traceability Status I.** The State and Tribe meet all traceability performance standards for the species.
- **Traceability Status II.** The State or Tribe does not meet all traceability performance standards for the species, but performance is within the defined acceptable range (details to be provided in performance standards document). No additional traceability requirements are imposed for interstate movement of that species from the State or Tribe. The State or Tribe implements corrective actions and will be re-evaluated within 1 year. APHIS will re-evaluate the State or Tribe upon request of State or Tribal animal health officials. If the State or Tribe does not meet all traceability performance standards for the species after 3 years, the State or Tribe will be assigned Traceability Status III for that species.
- **Traceability Status III.** The State or Tribe does not qualify for Traceability Status I or II for that species. Additional requirements will apply to interstate movements of that species from the State or Tribe to improve traceability of that species. The Administrator will establish additional interstate movement requirements in each case, taking into consideration the results of the traceability status evaluation. The additional requirements could include requirements to apply or record official identification that would otherwise not be required under the regulation or supplemental documentation, such as permits. Additional interstate movement requirements applicable to a particular species from a State or Tribe classified as Traceability Status III for that species will be made public. APHIS will re-evaluate the State or Tribe at the request of State or Tribal animal health officials.

**Any Tribe that wishes to** be evaluated and assigned a traceability status separate from the State(s) in which its lands are located may request separate consideration at any time. A State's evaluation and status will include Tribal lands within the State's boundaries unless the Tribe has requested and received separate status for traceability. Federal traceability regulations will apply to the movement of livestock onto and from Tribal lands only when the movement is an interstate movement; that is, when the movement is across a State line. However, requirements for official identification and ICVIs would not apply to the movement of livestock within Tribal land that straddles a State line if the Tribe has a separate traceability status from the States in which its lands are located.

## Traceability Regulation Working Group

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Chapman, Vince	Traceability Program Staff
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## **11. Appendix II**

# **Animal Disease Traceability Framework**

**Update and  
Preliminary Content of the Proposed Rule**

**Animal and Plant Health Inspection Service  
U.S. Department of Agriculture**

**August 13, 2010**

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## Introduction

The Secretary's February 5 announcement on traceability set a new course for the Department's approach to animal disease traceability to strengthen its ability to successfully respond to animal diseases. Through the new framework, the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) will implement a flexible yet coordinated approach to animal disease traceability that embraces the strengths and expertise of States, Tribes, and producers and empowers them to find and use the traceability approaches that work best for them. The overall goal of this framework is to have an adaptable approach that will help us find disease, quickly address it, and minimize harm to producers.

We have had successful traceability through the identification methods used in disease eradication programs, and we will build on those successes. The fundamentals include re-establishing the use of the basic identification methods that have proven to be successful, widely accepted by producers, and cost effective. In general, we are looking at regulating the interstate movement of farm-raised livestock and poultry. Because of the significant void in traceability in the cattle sector at this time, new requirements for the identification and documentation of cattle moving interstate will be added. For captive cervids, equine, poultry, sheep and goats, and swine, the existing and or new requirements in title 9, *Code of Federal Regulations* (9 CFR) will support the traceability framework.

Establishing and using standards are critical to the long-term success of our tracing capabilities. We are more clearly defining official identification and the Interstate Certificate of Veterinary Inspection (ICVI) and are collaborating to develop other data standards. Once we have the basics in place, we will make further progress over time.

Earlier this year, APHIS convened a Traceability Regulation Working Group to recommend the content of the proposed rule that would support an outcome-based approach to achieve improved traceability, while focusing on interstate movement. This document outlines the working group's current recommendations, which may continue to evolve through dialogue with producers, States, industry, and the public.

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## Traceability Rulemaking

Through rulemaking, APHIS plans to include many principles of the disease traceability framework in a new section of 9 CFR. The existing identification regulations for disease programs will be maintained and supersede the new regulations. Additionally, we will maintain import requirements related to identification and traceability in the existing regulations.

The traceability regulation will be “outcome based.” The outcomes are being developed and defined as traceability performance standards. The performance standards will align well with and support the “outcome-based” objective. Developing these standards is one of the primary tasks and objectives of the State, Tribal, and Federal Traceability Regulation Working Group that is working collectively on the content of the proposed rule.

The Federal regulations will require that certain livestock moved interstate be officially identified and be accompanied by an ICVI or other documentation. The regulations will specify authorized forms of official identification for each species that should be accepted by all States and Tribes. However, we intend to allow livestock to be moved between any two States or Tribes with another form of identification as agreed upon by animal health officials in the two jurisdictions. We acknowledge that some animals and interstate movements warrant exemption from official identification and ICVI requirements. These exemptions will be outlined in the regulation and are explained in the section below titled “Preliminary Content of the Proposed Traceability Rule.”

The regulations will require that certain livestock moved interstate be officially identified and be accompanied by an ICVI.

### Concepts of Traceability Performance Standards

The concept of traceability performance standards supports and aligns with the basic principle of an outcome-based regulation. Performance standards describe a desired result or outcome, but not the methods for achieving the result or outcome. They provide a process to uniformly evaluate the tracing capabilities of States and Tribes. The measures we have developed focus on tracing animals, not tracking a specific disease. We do not want to build individual solutions for each disease. The information needed and how it is used differ for each specific disease situation.

Traceability performance standards support and align with the basic principle of an outcome-based regulation.

The first principle in establishing any performance standard is determining what is being measured. For animal disease traceability, we considered the typical activities taken during a disease traceback event. In addition to the activity, a factor or percent for the successful completion of the activity and a value of time for completing the activity establish the standard. An example would be tracing animals to the State or Tribe in which they were identified 95 percent of the time within 7 days.

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The working group has incorporated the concept of a traceability unit into the traceability performance measures. The concept of a traceability unit was established in the framework announcement to give the States and Tribes flexibility and enable them to trace to the degree or level they determine appropriate. It refers to the geographical location a State or Tribe determines will facilitate animal disease responses as supported by local industries. The size of the traceability unit may vary—it may be a region, a State or Tribal Nation, a county, a livestock operation, or a site within an operation. It is up to the State or Tribe to determine and could be the smallest unit that the Administrator would initially quarantine in the event of a disease outbreak. It is important that we have consistent interpretation of this term in measuring performance.

Traceability performance standards will help evaluate States' and Tribes' tracing capability. In measuring the tracing capability, we will consider whether reference animals (animals that are part of a disease investigation or selected for a test exercise) that are required to be officially identified for the purpose of interstate movement can be traced to or from the designated traceability unit within a certain timeframe during a disease investigation. The results of the evaluations would determine a State's or Tribe's traceability status. APHIS will maintain a public listing of traceability statuses. Traceability performance standards are discussed in more detail in the section on the Preliminary Content of the Proposed Traceability Rule.

The results of the evaluations would determine a State's or Tribe's traceability status.

## Preliminary Timeline

Because rulemaking is a complex process, timelines are difficult to project and often need to be readjusted. In addition, with this rule, APHIS is conducting extensive outreach and collaboration as it develops the rule. At the same time, establishing the traceability regulation is a high priority, and APHIS, together with the working group, is striving to expedite the publication of the rule. We acknowledge that parts of the regulations will need to be phased in to enable the transition to the new framework. The following are the preliminary timelines for publication and implementation of the traceability rule.

- Publish proposed rule approximately April 2011.
- Publish final rule approximately 12 to 15 months after proposed rule is published.

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## Preliminary Content of the Proposed Traceability Rule

After extensive collaboration with stakeholders and the public, the Traceability Regulation Working Group has made preliminary recommendations to APHIS on the content of a new traceability section as well as recommendations on incorporating existing interstate movement and identification regulations into the new section. As part of the decision-making process, APHIS and the working group members are seeking feedback on this preliminary draft. The rulemaking process—including the comments received during the comment period of the proposed rule—will further guide the decision-making process for the content of the rule.

### General Requirements for Traceability

Official identification, defined for each species, and an ICVI would be the primary requirements for the interstate movement of livestock. Exceptions to these requirements would be defined for each species. Livestock moved interstate would continue to have to comply with official identification and other documentation requirements in disease program regulations.

The interstate movement requirements would not apply to the movement of livestock within Tribal land that straddles a State line if the Tribe has a separate traceability status from the States in which its lands are located.

The interstate movement requirements would not apply to the movement of livestock to a custom slaughter facility in accordance with State and Federal (Food Safety and Inspection Service, or FSIS) regulations for preparation of meat for personal consumption.

Under the new regulations, States and Tribes would need to meet traceability performance standards (see section on performance standards below). If States and Tribes do not meet the performance standards, States and Tribes may need to meet additional requirements for the movement of animals.

### General recordkeeping requirements for traceability

**Records of tag distribution.** The State or Tribal Nation that issued official tags with the National Uniform Eartagging System would be required to keep a record of all official identification numbers issued to an animal. The records would have to include sufficient information to determine where the official device was distributed. States and Tribes would have to retain those records for 5 years. The records would have to be made available to APHIS during any audit and during a disease event. The record of distribution of devices with the Animal Identification Number (AIN) would be required to be entered in the Animal Identification Management system and in accordance with the Traceability Technical Standards document.

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**Interstate movement records:** Whenever livestock are moved interstate to a premises or shipped interstate from a premises, the person responsible for the premises must keep a copy of any ICVI or other documentation for the interstate movement of the livestock. The ICVI or other documentation must be kept for 5 years and must be made available to APHIS and State animal health officials upon request.

### **Captive Cervids**

Captive cervids moved interstate would be required to be officially identified as will be provided in the CWD regulations. The traceability regulation will not have any effect on captive cervids—the official identification requirements in 9 CFR part 81, “Chronic Wasting Disease in Deer, Elk, and Moose,” will be used to support the traceability framework.

### **Cattle and Bison**

#### Official Identification

Current regulations in 9 CFR 71.18 require the individual identification of sexually intact cattle (breeding animals) over 24 months of age that move interstate. The new regulation would require all cattle and bison moved interstate to be officially identified with either an official eartag or group/lot identification. The new regulation would provide the following exceptions to the official identification requirement for cattle and bison moved interstate:

- As a commuter herd with a copy of the commuter herd agreement.
- Directly from one State through another State and back to the original State (for example, a truck crosses into another State when moving cattle to another farm location within the producer’s operation).
- Between any two States or Tribes with another form of identification as agreed upon by animal health officials in those two States or Tribes.
- Directly to an approved tagging site. The cattle or bison must be officially identified before commingling with cattle from other premises.

For 1 year after the final rule is published, sexually intact cattle or bison under 18 months of age or steers or spayed heifers may be moved interstate without official identification. However, all dairy cattle, sexually intact cattle greater than 18 months of age or cattle or bison used for rodeo, recreational, or exhibition purposes would be required to be officially identified if moving interstate upon the effective date of the rule.

Further, the 1-year period would apply to cattle or bison moved directly to a recognized slaughtering establishment. It would also apply to cattle and bison moved directly to a livestock facility approved to handle “for slaughter only” animals and then moved directly to a recognized slaughtering establishment. However, animals moving in these slaughter channels would be required to have a USDA-approved backtag applied when moved interstate or at their first

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destination; that is, at the recognized slaughtering establishment or federally approved livestock facility “for slaughter only” animals.

#### Interstate Certificate of Veterinary Inspection

**All cattle and bison moving interstate, unless otherwise exempt, must be accompanied by an ICVI or other documentation. Exemptions to the ICVI requirement would include cattle and bison moved:**

- Directly to a recognized slaughtering establishment, or directly to an approved livestock facility approved to handle “for slaughter only” animals and then directly to a recognized slaughtering establishment. An owner-shipper statement would be required for these movements.
- Directly to an approved livestock facility with an owner-shipper statement; if these cattle and bison are then moved interstate from the facility, an ICVI would be required.
- From the farm of origin for veterinary medical examination or treatment and returned to the farm of origin without change in ownership.
- Directly from one State through another State and back to the original State.
- As a commuter herd with a copy of the commuter herd agreement.
- Between any two States with documentation other than an ICVI, as agreed upon by animal health officials in those two States.

The official identification number would be required on the ICVI, unless:

- The cattle or bison are moved from an approved livestock facility directly to a recognized slaughtering establishment; or
- The cattle or bison are (1) sexually intact and under 18 months of age or (2) steers or spayed heifers; this exception does not apply to dairy cattle or to cattle or bison used for rodeo, exhibition, or recreational purposes.

Table 1 below summarizes the potential official identification and ICVI requirements for cattle.

Step I: Provides initial exemption to delay the inclusion of feeder cattle and young stock under 18 months of age. Additionally, Step I includes an educational period for several months following publication of the final rule in which producers are informed of regulatory requirements.

Step II: All ages and classes of cattle require official identification with the remaining exemptions focused on types of interstate movements.

**Table 1. Summary of Cattle<sup>1</sup> Potential Requirements**

Official Identification		Interstate Certificate of Veterinary Inspection
Step I	Step II	
<p><b>Unless exempt as provided below, official identification required for:</b></p> <ul style="list-style-type: none"> <li>• All dairy cattle</li> <li>• Other sexually intact cattle more than 18 months of age</li> <li>• Cattle used for rodeo and recreational events</li> <li>• Cattle moved to shows or exhibitions</li> </ul>	<p><b>Unless exempt as provided below, official identification required for:</b></p> <ul style="list-style-type: none"> <li>• All cattle</li> </ul>	<p><b>Unless exempt as provided below, ICVIs required for:</b></p> <ul style="list-style-type: none"> <li>• All cattle</li> </ul>
<p><b>Exemptions to the Official Identification Requirements</b></p> <ul style="list-style-type: none"> <li>• Steers or spayed heifers (except if involved in rodeo, recreation, shows, or exhibitions)</li> <li>• Cattle moved directly to slaughter (including through one approved livestock facility; for example, auction/market) with a USDA-approved backtag</li> <li>• Cattle moved to a custom slaughter facility in accordance with State or Federal regulations for preparation of meat for personal consumption</li> <li>• Cattle moved as a commuter herd with a copy of the commuter herd agreement</li> <li>• Cattle may be moved interstate between any two States/Tribes with other identification methods (other than what is defined as official) as agreed on by animal health officials in those two States/Tribes</li> </ul>		<p><b>Exemptions to the ICVI</b></p> <ul style="list-style-type: none"> <li>• Cattle moved direct to slaughter (including through one approved market) and: <ul style="list-style-type: none"> <li>• An owner-shipper statement is required, but individual identification does not need to be recorded for cattle moved from a federally approved livestock facility directly to slaughter.</li> </ul> </li> <li>• Cattle moved directly to an approved livestock facility with an owner-shipper statement that do not move interstate from the facility unless accompanied by an ICVI</li> <li>• Cattle moved from the farm of origin for veterinary medical examination or treatment and returned to the farm of origin without change in ownership</li> <li>• Cattle moved as a commuter herd with a copy of the commuter herd agreement</li> <li>• Additionally, cattle may be moved between any two States/Tribes with documentation other than an ICVI, as agreed on by animal health officials in those two States/Tribes</li> </ul>
<p><b>Other Circumstances when Official Identification Requirements are Waived or Delayed</b></p> <ul style="list-style-type: none"> <li>• Cattle may be moved interstate without official identification during transit if destined to an approved tagging site (may be a market/auction barn) and identified before commingling with cattle from other premises.</li> <li>• Cattle moved directly from one State through another State and back to the original State without official identification</li> </ul>		
		<p><b>Recording Official Identification on ICVIs</b></p> <p>The recording of official identification numbers would be required for all cattle on the ICVI that require official individual identification other than “feeder” cattle.</p>

<sup>1</sup> The Working Group recommends that bison follow the same requirements as cattle.

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## Horses and Other Equine

Horses and other equine moved interstate would be required to be officially identified and documented as provided in 9 CFR part 75, “Communicable Diseases in Horses, Asses, Ponies, Mules, and Zebras.” Horses and other equine moved interstate would be required to be officially identified in the new traceability regulation with one of the choices specified below:

- A description sufficient to identify the individual equine, including, name, age, breed, color, gender, distinctive markings, or unique and permanent forms of identification when present (e.g., brands, tattoos, scars, cowlicks, or blemishes)
- Electronic identification that complies with ISO 11784/11785
- Digital photographs of the equine

## Poultry

### Official Identification

Poultry moved interstate would be required to be officially identified in the new traceability regulation with one of the choices specified below:

- Identification devices or methods approved for use in the National Poultry Improvement Plan (NPIP) by 9 CFR parts 145-147.
- Group/lot identification when a group/lot identification number (GIN) may be used.
- Identification devices or methods agreed upon by animal health officials in States that are involved in an interstate movement.

### Interstate Certificate of Veterinary Inspection

Additionally, the new regulation would require poultry moved interstate to be accompanied by an ICVI unless they are moved:

- From a flock participating in the NPIP and are accompanied by the documentation required by that program.
- Directly to a recognized slaughtering establishment.
- From the farm of origin for veterinary medical examination, treatment, or diagnostic purposes and either returned to the farm of origin without change in ownership or euthanized and disposed of at the veterinary facility.
- Directly from one State through another State and back to the original State.
- Between any two States with documentation other than an ICVI, as agreed upon by animal health officials in those two States.



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## Sheep and Goats

Sheep and goats moved interstate would be required to be officially identified as required by the scrapie regulations in 9 CFR part 79. The traceability regulation would not have any effect on sheep and goats—the official identification and documentation requirements in 9 CFR part 79, “Scrapie in Sheep and Goats,” will be maintained.

## Swine

Swine moved interstate would be required to be officially identified as required by regulations in 9 CFR Part 71.19. The traceability regulation will not have any effect on swine—the official identification and documentation requirements in 9 CFR 71.19, “Identification of Swine in Interstate Commerce,” will be maintained.

## Official Identification

The traceability regulation will contain official identification requirements by species for individual animals and groups of animals. Basically, the regulation would specify that identification is required for the interstate movement of each listed species, unless otherwise exempted. The regulation would specify what criteria must be met for the various eartags, devices, or methods to be considered official for each species. One method for all species will be an official identification number, as defined in the regulation, for an animal or group of animals moving interstate. (See the definitions section for more detail.)

### Summary of Official Identification Eartags

The following is a summary of official identification eartag criteria and options based on the intended content of the proposed traceability rule. Table 2 gives examples of official identification numbers for individual animals. Table 3 briefly lists official identification eartags that would conform to the new regulation.

At a minimum, official identification eartags for individual animals must be imprinted with:

- An official animal identification number
- U.S. shield<sup>2</sup>



The basic characteristics are:

- Tamper evident, high retention
- Other characteristics defined through tag specification

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<sup>2</sup> In the past, States that ordered metal tags directly from the manufacturer have used the State postal abbreviation in lieu of the U.S. shield. The new traceability regulation would state that, “Beginning 1 year after the effective date of the final rule, all official eartags applied to animals must bear the U.S. shield.” The intent is to achieve a process to easily and consistently determine if an animal’s eartag is official per the *Code of Federal Regulations*.

**Table 2. Official Identification Numbers for Individual Animals**

Number	Format of Animal Number	Examples
National Uniform Eartagging System (NUES)	9 character - 2 numeric State code or 2 alpha postal abbreviation - 3 alpha series - 4 digits in a chronological numerical series	23 ELV 4574 PA ELV 4574
	8 character - Swine and other species (except sheep and goats) o 2 numeric State code o 2 alphabetical series o 4 digits in a chronological numerical series	23 AB 4574
	- Sheep and goats (exclusive to scrapie program) o 2 alpha postal abbreviation o 2 alphabetical or alphanumeric series o 4 digits in a chronological numerical series	PA AB 4574 or PA A2 4574
Animal Identification Number (AIN)	- 15 digits; 840 is the first three digits (numeric code for USA)	840 003 123 456 789
Flock-Based Number	- Flock identification number (maximum of 9 characters prefixed with State's postal abbreviation) with a unique herd management number	MN0456 4275
Location-Based Number	- Either a PIN or LID with a unique herd management number	006ER2A 4275

**Table 3. Summary of USDA Official Eartags (does not include official reactor tags, etc.)**

Official Identification Eartags	General Explanation
Brucellosis Vaccination Eartag	- Restricted for use with brucellosis vaccination
National Uniform Eartagging System (NUES) - Referred to as "Brite" Tags	- Historically used for disease testing and interstate movement - VS Memorandum being revised to allow distribution to producers at direction of State animal health officials
Animal Identification Number (AIN) "840" Tags	- Provided to producers or animal health official. Various sizes, shapes, colors. Visual only or with RFID technology. May be imprinted with additional information for program identity, e.g., age, source programs.
Scrapie Program Tags	- Serial and flock identification tags including scrapie flock certification program tags approved through the scrapie program and provided at no cost to producers, markets, veterinarians and others at no cost through State or AVIC offices. "840" tags are also provided for regulatory work in infected and exposed flocks. Producers may purchase customized flock identification or "840" tags from approved tag manufactures.
Premises Identification Number (PIN) Tags – Slaughter Swine	- Imprinted with premises identification number. Various tags approved through authorized manufacturers.

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## Administration of Official Identification Devices

**Removal of official identification.** Removal of official identification devices, including devices applied to imported animals in their countries of origin and recognized by the Administrator as official, would be prohibited except at the time of slaughter; at other points of termination, such as rendering facilities or diagnostic laboratories; and in compliance with FSIS regulations on the collection of all manmade identification and the correlation of such with carcasses through final inspection.

**Replacement of official identification.** The State animal health official or an Area Veterinarian in Charge would be able to authorize the replacement of an official identification device under certain circumstances, including:

- Deterioration of the device such that loss of the device appears likely or the number can no longer be read
- Infection at the site where the device is attached, necessitating application of a device at another location (e.g., a slightly different location of an eartag in the ear)
- Malfunction of the electronic component of a radio frequency identification (RFID) device
- Incompatibility or inoperability of the electronic component of a radio frequency device with the management system or unacceptable functionality of the management system due to use of an RFID device.

When an official identification device is replaced, as authorized by the State animal health official or Area Veterinarian in Charge, the following information would have to be recorded: the date the device is removed, contact information for the location where the device is removed, the official identification number on the device removed (to the degree possible), the type of device removed (e.g., metal eartag, RFID eartag), reason for the removal, the new official identification number of the replacement device, and the type of replacement device applied.

**Sale or transfer of official identification devices.** Unless authorized by APHIS, the regulations would prohibit the sale or transfer of official identification devices from the premises to which they were originally issued to another premises.

**Loss of official identification devices.** If an animal loses an official identification device and needs a new one, the new official identification number would be correlated with the lost number, when possible, on the record of tags applied.

**Application of only one official tag and number.** After a certain date specified in the final rule, applying more than one official identification device with different numbers to the same animal would be prohibited. However, a State animal health official or Area Veterinarian in Charge may approve the application of a second official identification number in specific cases when the need to maintain the identity of an animal is intensified (such as for export shipments, quarantined herds, field trials, experiments, or disease surveys). Approval cannot be merely for the

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convenience of identifying animals. The second official identification number must be correlated with the first official identification number with pertinent information maintained by the person applying the second official device. APHIS will provide processes and information systems that may be used to electronically maintain this data. Additionally, an animal identification number (AIN) RFID eartag may be applied to an animal that is already officially identified with an official eartag with the National Uniform Eartagging System number (commonly referred to as an official metal or “brite” tag). The animal’s official identification number on the existing official identification eartag must be recorded and reported in accordance with the AIN device distribution policies.

**Collection of identification at slaughter:** APHIS plans to work with FSIS to support the collection of all manmade identification at slaughter plants under existing regulations. Additionally, the new traceability regulation would require that all man-made identification devices affixed to livestock moved interstate be removed at slaughter, placed in a clear plastic bag, and affixed to the corresponding carcass until the postmortem examination has been completed. Alternate methods of correlating identification devices with the carcass may be approved by FSIS. Such official identification devices must be made available to APHIS and FSIS when required to obtain traceback information necessary for proper disposition of the animal or carcass, for controlling the slaughter of reactor or suspect animals, or for the documentation of animal termination post inspection.

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## Traceability Performance Standards

The regulations would require States and Tribes to meet certain traceability performance standards. APHIS plans to reference the traceability performance standards in the regulation, but will list them in a separate Traceability Performance Standards document. Listing the performance standards separately would enable APHIS to make the regulations more flexible as the performance standards may need to be revised occasionally. Any changes would be made after publication of a notice in the *Federal Register* soliciting comments on the potential revisions.

Some of the performance standards will become more stringent as the outcomes of the new regulations are realized. We do not know when the more stringent standards would become effective; at this time, we are merely reflecting that tracing capability will improve in these areas.

The working group has identified four activities that focus on the interstate movement of animals. The term *reference animal*, used in the draft performance standards discussed below and in table 4, means an animal that is part of an actual disease investigation or an animal selected as part of a test exercise. The reference animal would have moved interstate and have been officially identified.

The **first performance standard** measures how long it will take the receiving State or Tribe to notify the State or Tribe in which the animals were officially identified. Since this is already a relatively simple process, the working group recommends that it should be accomplished 95 percent of the time within 1 business day.

The **second performance standard** measures the ability of a State or Tribe in which animals are officially identified to determine the traceability unit in which reference animals were identified. The working group recommends this process be phased in to provide achievable standards in the short term and higher standards in the long term. Currently, the records of tags applied are in paper-based systems that may take more time to research than electronic databases. When the performance standards are first evaluated, the activity should be accomplished 75 percent of the time within 5 business days. As official identification records become easier to search, the time required to find the origin of an identification device will decrease. At that time, the activity should be accomplished 95 percent of the time within 2 business days.

The complexity of this standard, as well as standard four, directly correlates to the traceability unit<sup>3</sup> defined by the State or Tribe. The greater the specificity of the traceability unit, the more advanced disease response capabilities become. A more complex traceability system is needed to achieve the more specific traceability unit. While a traceability plan would not be required in the regulation, each State and Tribe should have a traceability plan that addresses these variables and provides flexibility for local decisions.

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<sup>3</sup> The geographical unit to which an animal is required to be identified, as selected by a State or Tribe. The unit may be a State or Tribe, a county, a premises, a site within a premises, or some other unit as determined by the State or Tribe. The unit selected by a State or Tribe could be the smallest unit that the Administrator would initially quarantine in the event of a disease outbreak.

The **third performance standard** measures the States' and Tribes' ability to notify the State or Tribe from which the reference animals were shipped. The working group also recommended that this standard be phased in. Initially, the activity should be accomplished 95 percent of the time within 7 business days. As traceability systems mature, the activity should be accomplished 95 percent of the time within 3 business days. Increasing the use of electronic ICVIs will make achieving this performance standard easier.

The **fourth performance standard** measures the ability of States and Tribes to identify the traceability unit from which the reference animals were shipped. The working group also recommended that this standard progress over time. Initially, the activity should be accomplished 75 percent of the time within 5 business days. As the system matures, the activity should be accomplished 95 percent of the time within 2 business days.

The following table summarizes the performance standards being considered to align with the objectives of an "outcome-based" regulation.

**Table 4: Interstate Traceability Performance Standards**

Action	Who Performs	Description	Standard
1. Notify the State/Tribe in which reference animals were officially identified	State/Tribe that received the animal	For animals that are required to be officially identified, how long will it take the receiving State/Tribe to notify the State/Tribe in which the animals were officially identified?	95% notification within 1 business day
2. Identify traceability unit in which reference animals were identified	State/Tribe where the animal was officially identified	For animals that are required to be officially identified, how long will it take the State/Tribe in which the animals were officially identified to specify the traceability unit within which the animals were officially identified?	Initial: 75% within 5 business days  Future: 95% within 2 business days
3. Notify the State/Tribe from which the reference animals were shipped	State/Tribe that received the animal	For animals that are required to be officially identified, how long will it take the receiving State/Tribe to notify the State/Tribe in which the interstate animal movement was initiated?	Initial: 95% within 7 business days  Future: 95% within 3 business days
4. Identify the traceability unit from which the reference animals were shipped	State/Tribe that shipped the animal (may be the same State/Tribe in #2)	For animals that are required to be officially identified, how long will it take the State/Tribe from which the interstate animal movement was initiated to specify the traceability unit from which the shipment was initiated?	Initial: 75% within 5 business days  Future: 95% within 2 business days

### How would these traceability performance activities be conducted?

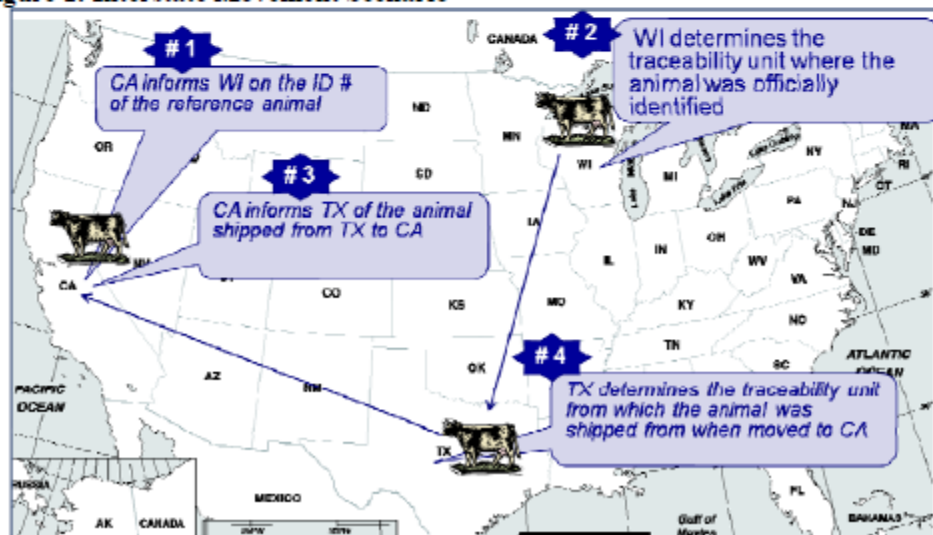
For illustrative purposes, let's consider the interstate movement scenario where a dairy cow was shipped from Wisconsin to Texas. The animal had been identified through the Dairy Herd Improvement Association with an 840 tag. Therefore, that identification was used to meet the official identification requirement for interstate movement. The cow was then sold and moved from Texas to California.

The diagram below illustrates the actions these States would take to fulfill the traceability performance standards. In this exercise, California identifies the animal as a reference animal for performance standard measurement purposes. The following actions reflect how the performance standards align with traceback activity (presented in the numeric order of the performance standards, not necessarily the order the actual tracing events may be conducted).

- Performance Standard #1: California, using the Animal Identification Management System, determines the 840 tag was distributed to Wisconsin and informs Wisconsin of the official identification number of the reference animal.
- Performance Standard #2: Wisconsin determines the traceability unit where the reference animal was officially identified. Again, the Animal Identification Management System should be a good source of that information.
- Performance Standard #3: California informs Texas of the official identification number of the animal shipped from Texas to California.
- Performance Standard #4: Texas determines the traceability unit that the reference animal moved from when shipped to California.

Figure 1 below illustrates the actions these States would take to fulfill the traceability performance standards.

Figure 1: Interstate Movement Scenario



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## Traceability Status

APHIS, through collaboration with States and Tribes, will establish and publish a process for evaluating the capability of States and Tribes in comparison to the traceability performance standards. Traceability status will reflect States' and Tribes' ability to meet the traceability performance standards. A separate status will be assigned for each species. The following categories explain the statuses being considered; the label for each status still needs to be determined:

- **Traceability Status I.** The State and Tribe meet all traceability performance standards for the species.
- **Traceability Status II.** The State or Tribe does not meet all traceability performance standards for the species, but performance is within the defined acceptable range (details to be provided in performance standards document). No additional traceability requirements are imposed for interstate movement of that species from the State or Tribe. The State or Tribe implements corrective actions and will be re-evaluated within 1 year. APHIS will re-evaluate the State or Tribe upon request of State or Tribal animal health officials. If the State or Tribe does not meet all traceability performance standards for the species after 3 years, the State or Tribe will be assigned Traceability Status III for that species.
- **Traceability Status III.** The State or Tribe does not qualify for Traceability Status I or II for that species. Additional requirements will apply to interstate movements of that species from the State or Tribe to improve traceability of that species. The Administrator will establish the additional interstate movement requirements in each case, taking into consideration the results of the traceability status evaluation. The additional requirements could include requirements to apply or record official identification that would otherwise not be required under the regulation or supplemental documentation, such as permits. Additional interstate movement requirements applicable to a particular species from a State or Tribe classified as Traceability Status III for that species will be made public. APHIS will reevaluate the State or Tribe at the request of State or Tribal animal health officials.

**Any Tribe that wishes to be evaluated and assigned a traceability status separate from the State(s) in which its lands are located may request separate consideration at any time.** A State's evaluation and status will include Tribal lands within the State's boundaries unless the Tribe has requested and received separate status for traceability. Federal traceability regulations will apply to the movement of livestock onto and from Tribal lands only when the movement is an interstate movement; that is, when the movement is across a State line. However, requirements for official identification and ICVIs would not apply to the movement of livestock within Tribal land that straddles a State line if the Tribe has a separate traceability status from the States in which its lands are located.

Listings of traceability statuses, according to species, for all States and Tribes would be posted on the APHIS traceability Web site. The public would be informed about changes in status through notices published in the *Federal Register*.



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## Definitions

The following definitions would be included in the regulations. Additional definitions would also be included.

- **Animal identification number (AIN).** A numbering system for the official identification of individual animals in the United States that provides a nationally unique identification number for each animal. The AIN consists of 15 digits, with the first 3 being the country code (840 for the United States). The alpha characters USA or the numeric code assigned to the manufacturer of the identification device by the International Committee on Animal Recording may be used as an alternative to the 840 prefix until 1 year after the effective date of the final rule.
- **Approved livestock facility.** A stockyard, livestock market, buying station, concentration point, or any other premises under State or Federal veterinary inspection where livestock are assembled and that has been approved under 9 CFR 71.20.
- **Approved tagging site.** Premises authorized by APHIS or State animal health officials to officially identify livestock on behalf of their owner or the person in possession, care, or control of the animals when they are brought to the premises.
- **Commuter herd.** A herd of cattle or bison moved interstate during the course of normal livestock management operations and without change of ownership directly between two premises, as provided in a commuter herd agreement.
- **Commuter herd agreement.** A written agreement between the owner(s) of a herd of cattle or bison and the animal health officials for the States or Tribes of origin and destination specifying the conditions required for the interstate movement from one premises to another in the course of normal livestock management operations and specifying the time period, up to 1 year, that the agreement is effective. A commuter herd agreement may be renewed annually.
- **Directly.** Without unloading en route if moved in a means of conveyance, or without stopping if moved in any other manner.
- **Flock-based numbering system.** The flock-based number system combines a flock identification number (FIN) with a producer's livestock production numbering system to provide a nationally unique identification number for an animal. The FIN and the production number must both appear and be distinct on the official tag and may not include the letters "I," "O," or "Q" other than as part of a State postal abbreviation.
- **Flock identification number (FIN).** A nationally unique number assigned by a State or Federal animal health authority to a group of animals that are managed as a unit on one or more premises and are under the same ownership. The FIN must begin with the State postal abbreviation, must have no more than nine alphanumeric characters, and must not contain the letters "I," "O," or "Q" other than as part of the State postal abbreviation. FINs will be linked with the National Scrapie Database to one or more premises identification numbers
- **Group/lot identification number (GIN).** The identification number used to uniquely identify a "unit of animals" of the same species that is managed together as one group throughout the preharvest production chain. The GIN consists of the location

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identification number (LID) or premises identification number (PIN), as defined in this section, plus a six-digit representation of the date on which the group or lot of animals was assembled (MM/DD/YY), and two additional digits, ranging from 01 to 99, for the numbering of different groups or lots of animals assembled on the same premises on the same day. When more than one group of animals is assembled, the groups will be designated consecutively as 01, 02, 03, etc. The number is established by the person responsible for the animals. When a group/lot identification number is used, the group/lot identification number is recorded on documents accompanying the animals; it is not necessary to have the GIN attached to each animal.

- **Interstate certificate of veterinary inspection (ICVI).** An official document issued by a Federal, State, or accredited veterinarian at the location from which animals are shipped interstate. The ICVI must show the species of animals covered by the ICVI, the number of animals covered by the ICVI, the purpose for which the animals are to be moved, the location where the animal was inspected prior to shipment and the animal's destination, and the name and address of the consignor and the consignee. Additionally, unless the species-specific requirements for ICVI provide an exception, the ICVI must list the official identification number of each animal or group of animals moved that is required to be officially identified, or, if the sending and receiving States have agreed upon an alternative form of identification, the ICVI must include a record of that identification. If animals moving under a GIN also have individual official identification, only the GIN must be listed on the ICVI. If the animals are not required by the regulations to be officially identified, the ICVI must state the exemption that applies (e.g., the animals are steers or spayed heifers and moved within 1 year of the effective date of the final rule). If the animals are required to be officially identified but the identification number does not have to be recorded on the ICVI, the ICVI must state that all animals to be moved under the ICVI are officially identified; an ICVI may not be issued for any animal that is not officially identified if official identification is required.
- **Interstate movement.** From one State into or through any other State.
- **Location-based numbering system.** The location-based number system combines a State or Tribal-issued location identification (LID) number or a premises identification number (PIN) with a producer's livestock production numbering system to provide a unique identification number for an animal.
- **Location identification number (LID).** A nationally unique number issued by a State, Tribal, and/or Federal animal health authority to a location as determined by the State or Tribe in which it is issued. The LID may be used in conjunction with a producer's own livestock production numbering system to provide a unique identification number for an animal. It may also be used as a component of a group/lot identification number. The LID must not contain the letters "I" or "O" other than as part of a State postal abbreviation. The LID consists of:
  - A six- or eight-character alphanumeric code, with the first two characters being either the State postal abbreviation or, for LIDs issued by a Tribe, a two-character alphanumeric code issued to the Tribe by APHIS; or

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- A seven-character alphanumeric code with the first two characters being the State postal abbreviation and the right-most character being a check digit based on the ISO 7064 Mod 36/37 check digit algorithm.
  - **Moved.** To carry, enter, import, mail, ship, or transport; to aid, abet, cause, or induce carrying, entering, importing, mailing, shipping, or transporting; to offer to carry, enter, import, mail, ship, or transport; to receive in order to carry, enter, import, mail, ship, or transport; or to allow any of these activities.
  - **National Uniform Eartagging System.** A numbering system for the official identification of individual animals in the United States that provides a nationally unique identification number for each animal. The National Uniform Eartagging System employs a nine-character alphanumeric format consisting of a two-number or two-letter State, Tribe, or territory code, followed by three letters and four additional numbers or eight-character alphanumeric format consisting of a two-number or two-letter State, Tribe, or territory code, followed by two letters and four additional numbers. The eight-character format with the postal abbreviation may have a number and letter combination following the postal abbreviation (see table 2 for the listing of these format options). Official APHIS disease control programs may specify which format to employ.
  - **Official eartag.** An identification tag approved by APHIS that provides an official identification number for individual animals. Beginning 1 year after the effective date of the final rule, all official eartags applied to animals must bear the U.S. shield. The design, size, shape, color, and other characteristics of the official eartag will depend on the needs of the users, subject to the approval of the Administrator. The official eartag must be tamper-resistant and have a high retention rate in the animal.
  - **Official identification device or method.** A means approved by the Administrator of applying an official identification number to an animal of a specific species or associating an official identification number with an animal or group of animals of a specific species.
  - **Official identification number.** A nationally unique number that is permanently associated with an animal or group of animals and that adheres to one of the following systems:
    - National Uniform Eartagging System
    - Animal identification number (AIN)
    - Location-based number system
    - Flock-based number system
    - Any other numbering system approved by the Administrator for the official identification of animals
  - **Officially identified.** Identified by means of an official identification device or method.
  - **Owner-shipper statement.** A statement signed by the owner or shipper of the livestock being moved stating: the location from which the animals are moved interstate; the destination of the animals; the number of animals covered by the statement; the name and address of the owner at the time of the movement; the name and address of the shipper; and the identification of each animal, as required by the regulations, unless the regulations specifically provide that the identification does not have to be recorded.
  - **Premises identification number (PIN).** A nationally unique number assigned by a State, Tribal, and/or Federal animal health authority to a premises that is, in the judgment of the

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State, Tribal, and/or Federal animal health authority, a geographically distinct location from other premises. The premises identification number is associated with an address, geospatial coordinates, and/or location descriptors that provide a verifiably unique location. The PIN consists of a seven-character alphanumeric code, with the right-most character being a check digit. The check digit number is based on the ISO 7064 Mod 36/37 check digit algorithm. The first two characters may be the State's two-letter postal abbreviation or, for PINs assigned by a Tribe, a two-character alphanumeric code issued to the Tribe by APHIS. The PIN must not contain the letters "T" or "O," other than as part of the State postal abbreviation.

- **Recognized slaughtering establishment.** Any slaughtering facility operating under the Federal Meat Inspection Act (21 U.S.C. 601 *et seq.*), the Poultry Products Inspection Act (21 U.S.C. 451 *et seq.*), or State meat or poultry inspection acts.
- **Traceability unit.** The geographical unit to which an animal is required to be identified, as selected by a State or Tribal Nation. The unit may be a State or Tribal Nation, a county, a premises, a site within a premises, or some other unit as determined by the State or Tribal Nation. The unit selected by a State or Tribal nation will be the smallest unit that the Administrator would initially quarantine in the event of a disease outbreak.
- **United States Department of Agriculture (USDA) approved backtag.** A backtag issued by APHIS that provides a temporary unique identification for each animal.

# 12. Appendix III

DRAFT

## Official Eartags – Criteria and Options

August 13, 2010

*This report summarizes the criteria and options for official identification eartags based on the intended content of the proposed traceability rule and other policy revisions being made to VS memorandums.*

### Minimum criteria for official identification eartags for individual animals:

- Imprinted with a nationally unique official animal identification number
- U.S. shield<sup>1</sup>



### Basic characteristics:

- Tamper evident, high retention
- Other characteristics defined through tag specification

**Table 1. Official Identification Numbers for Individual Animals**

Number	Format of Animal Number	Number Examples
National Uniform Eartagging System (NUES)	9 character	23 ELV 4574
	- 2 numeric State code or 2 alpha postal abbreviation	PA ELV 4574
	- 3 alpha series	
	- 4 digits in a chronological numerical series	
	8 character	23 AB 4574
	- Swine and other species (except sheep and goats)	
	o 2 numeric State code	
	o 2 alphabetical series	
	o 4 digits in a chronological numerical series	
	- Sheep and goats (exclusive to scrapie program)	PA AB 4574
	o 2 alpha postal abbreviation	or
	o 2 alphabetical or alphanumeric series	PA A2 4574
	o 4 digits in a chronological numerical series	
<i>Note: The adjacent number option provides an alpha/numeric format following the State abbreviation to avoid duplication of numbers</i>		
Animal identification number (AIN)	- 15 digits; 840 is the first three digits (numeric code for USA)	840 003 123 456 789
Flock-based number	- Flock identification number (maximum of 9 characters prefixed with State's postal abbreviation) with a unique herd management number	MN0456 4275
Location-based number <sup>2</sup>	- Either a premises identification number (PIN) or location identification number (LID) with a unique herd management number	006ER2A 4275

<sup>1</sup> In the past, States that ordered NUES tags directly from the manufacturer have used the State postal abbreviation in lieu of the U.S. shield and the letters "VS" for Veterinary Services. The following text is being considered for the new traceability regulation; "Beginning 1 year after the effective date of the final rule, all official eartags applied to animals must bear the U.S. shield." The intent is to achieve an easy and consistent means to determine if an animal's eartag is official per the Code of Federal Regulations.

<sup>2</sup> Location identifiers in the new traceability framework include both the premises identification number (PIN) issued through the PIN allocator and the Location Identification (LID) numbers issued by the State or Tribe.

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**Table 2. Summary of USDA Official Eartags** (does not include official reactor tags, etc.)

Official Identification Eartags	General Explanation
Brucellosis vaccination eartag	- Restricted for use with brucellosis vaccination.
National Uniform Eartagging System (NUES) - Referred to as "Brite" Tags	- Historically been used for disease testing and interstate movement. - VS Memorandum being revised to allow distribution to producers at direction of State animal health officials.
Animal identification number (AIN) "840" Tags	- Provided to producers or animal health official. Various sizes, shapes, colors. Visual only or with RFID technology. May be imprinted with additional information for program identity, e.g., age, source programs.
Scrapie program tags	- Serial and flock identification tags including scrapie flock certification program tags approved through the scrapie program and provided at no cost to producers, markets, veterinarians, etc., through State or AVIC offices. "840" tags are also provided for regulatory work in infected and exposed flocks. Producers may purchase customized flock identification or "840" tags from approved tag manufacturers.
Premises identification number (PIN) tags – Slaughter swine	- Imprinted with premises identification number. Various tags approved through authorized manufacturers.

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**Table 3. Brucellosis Vaccination Eartag**

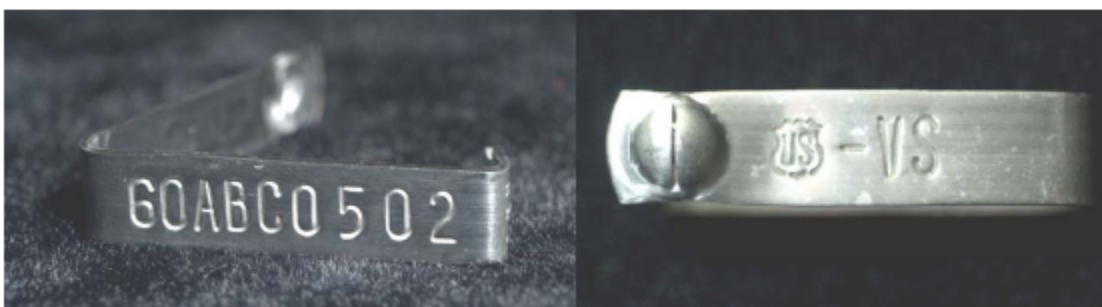
Tag Information	Description
Program use	Brucellosis
Material type	Metal
Color	Orange
Species used on	Cattle and bison
Information on the tag	Front of tag - 2 State code - "V" followed by 2 alpha characters in series - 4 numbers in a chronological numerical series  <i>Example: 23VFE0578</i>
	Back of tag - "VAC" to reflect the brucellosis vaccination - U.S. shield
Additional printing specifications	"T" is used following the State code to avoid duplication of numbers when the "V" series has been completely used.
Issued/distributed to	State/Federal employees & accredited veterinarians performing official brucellosis vaccination
Distribution records/reporting	Record of tags issued <ul style="list-style-type: none"> <li>The date, receipt, and the first and last serial number of the tags issued should be recorded.</li> </ul> Record of tags applied <ul style="list-style-type: none"> <li>Permanent record of tags applied.</li> </ul>
Other comments	Tag is applied in the middle of right ear.
How to obtain	State and Federal animal health officials, accredited veterinarians. For use only when calves are being vaccinated.



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**Table 4. National Uniform Eartagging System – (“Brite Tag”)**  
*9-character Format*

Tag Information	Description
Program use	Not a specific disease program tag
Material type	Metal
Color	Silver  <i>Note: USDA does not inventory a variety of colors; however, States may purchase colored tags, other than orange, from manufacturer.</i>
Species used on	Cattle most common. Acceptable for other species except sheep/goats.
Information on the tag	Front of tag - 2 numeric representing State code, or 2 alpha characters for State postal abbreviation - 3 alpha characters in an alphabetical series (omit “V” and “T” as first alpha in the series) - 4 digits in a chronological series Example: 60 ABC 0502
	Back of tag - U.S. shield - “VS” for Veterinary Services  <i>Note: State abbreviations acceptable in lieu of the “VS” for tags purchased direct by the State from the tag company.</i>
Additional printing specifications	
Issued/distributed to	Federal & State animal health officials, accredited veterinarians. Distribution to producers is optional and determined by the State.
Distribution records/reporting	Tag distribution records maintained by the State. States may use the Animal Identification Management System for maintaining the distribution records.
Other comments	
How to obtain	State and Federal animal health officials, accredited veterinarians





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**Table 5. National Uniform Eartagging System – (“Brite Tag”)**  
*8-character Format*

Tag Information	Description
Program use	Not a specific disease program tag
Material type	Metal
Color	Silver
Species used on	Most commonly used on species with smaller ears (deer/elk, swine, etc., except sheep and goats)
Information on the tag	Front of tag <ul style="list-style-type: none"><li>- 2 numeric characters representing State code, or 2 alpha characters for State postal abbreviation</li><li>- 2 alpha characters in an alphabetical series</li><li>- 4 digits in a chronological series</li></ul> Example: 23BG0575
	Back of tag <ul style="list-style-type: none"><li>- U.S. shield</li><li>- “VS” for Veterinary Services</li></ul> <i>Note: State abbreviations acceptable in lieu of the “VS” for tags purchased directly by the State from the tag company.</i>
Additional printing specifications	
Issued/distributed to	Federal & State animal health officials, accredited veterinarians. Distribution to producers is optional and determined by the State.
Distribution records/reporting	Tag distribution records maintained by the State. States may use the Animal Identification Management System for maintaining the distribution records.
Other comments	
How to obtain	State and Federal animal health officials, accredited veterinarians



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**Table 6. Animal Identification Number (AIN) Tags**

Tag Information	Description
Program use	Applicable for all official identification requirements
Material type	Plastic: With or without RFID
Color	Various colors (for AIN RF tags, orange is reserved for calfhood vaccination)
Species used on	Various sizes, shapes approved for most species
Information on the tag For describing 2-piece tags, the designation of "Tag Piece A," is the piece attached to the inside of the animal's ear (visual from the front of the animal). "Tag Piece B" is the piece attached to the outside of the animal's ear (visual from behind the animal).	<p>Tag Piece A: Inside of ear; visible from the front of the animal</p> <ul style="list-style-type: none"> <li>- U.S. shield</li> <li>- 15-digit code with 840 as first 3 digits (numeric code for USA)</li> <li>- Manufacturer's logo or trademark (printed or impression of)</li> </ul>
	<p>Tag Piece B: Outside the ear; visible from behind the animal</p> <ul style="list-style-type: none"> <li>- U.S. shield</li> <li>- UNLAWFUL TO REMOVE</li> <li>- Imprinting the AIN on the back piece of the tag is optional</li> </ul> <p><i>Note: Print specification for swine tags is different due to the visibility of information imprinted on swine tags.</i></p>
Additional printing specifications	<p>All tags have minimum print size specifications for required information imprinted on the tags. Other information, most applicable to the panel tags, may be imprinted on the tag if it does not reduce the readability of the required information.</p> <p>Tags with RFID must have all 15 digits of the AIN printed on the tag pieces that contain the transponder.</p>
Issued/distributed to	<p>USDA approves all AIN devices and allocates AIN only to authorized manufacturers that use the numbers on their approved devices.</p> <p>AIN manufacturers distribute tags through AIN managers with whom they have an agreement and directly to State/Federal animal health officials. AIN manufacturers may be AIN managers.</p>
Distribution records/reporting	<p>The entity (animal health officials or AIN manufacturer or managers) that provides the tag to the producer is responsible for having the distribution records entered/submitted to the Animal Identification Management System (AIMS). Likewise, if the tag is distributed to an AIN distributor, the distribution record is to be submitted to the AIMS. When issued for sheep and goats, the tag record must be administered through the scrapie program tag application of AIMS.</p> <p>A premises identification number (PIN) of the premises is required and is used for reporting the distribution record. The system will be adjusted to enable State-issued location identifiers to be used in lieu of PINs.</p>
Other comments	Tag pairs are available (combination of visual tags or visual and RF).
How to obtain	<p>AIN managers representing authorized AIN tag manufacturers (contact AIN manufacturers for information on their AIN managers).</p> <p>APHIS has limited inventory of AIN tags available to State and Tribal animal health officials and AVICs for disease program activities.</p>

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**Figure 1. AIN Tags**

AIN Panel Tag (Visual Only)	AIN RF Button Tags	AIN RF Panel Tags
		
Example of "Logo" AIN Tag	Paired AIN Visual/RFID Tag Set	Paired AIN Visual/Visual Tag Set
		<p>No picture available at this time</p>

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**Table 7. Flock Identification Tags**

Tag Information	Description
Program use	Scrapie eradication program
Material type	Plastic or metal
Color	USDA-provided tags are white or blue (slaughter only). Producers can purchase tags in various colors.
Species used on	Sheep and goats
Information on the tag For describing 2-piece tags, the designation of "Tag Piece A," is the female piece typically attached to the inside of the animal's ear (visual from the front of the animal). "Tag Piece B" is the male piece typically attached to the outside of the animal's ear (visual from behind the animal).	<p>Plastic – Tag Piece A: Inside of ear; visible from the front of the animal</p> <ul style="list-style-type: none"> <li>- U.S. shield</li> <li>- Flock identification number (maximum of 9 characters with first two the State abbreviation)</li> <li>- Unique herd management number</li> <li>- Manufacturer's logo or trademark (printed or impression of)</li> </ul> <p>Plastic – Tag Piece B: Outside the ear; visible from behind the animal</p> <ul style="list-style-type: none"> <li>- U.S. shield</li> <li>- UNLAWFUL TO REMOVE</li> <li>- May include the flock identification number (maximum of 9 characters with first two the State abbreviation) and/or unique herd management number</li> </ul>
Additional printing specifications	<p>Metal single piece – Front of tag</p> <ul style="list-style-type: none"> <li>- Flock identification number (maximum of 8 characters with first two the State abbreviation)</li> </ul> <p>Metal single piece – Back of tag</p> <ul style="list-style-type: none"> <li>- U.S. shield</li> <li>- Unique herd management number up to 6 digits in a chronological series</li> </ul> <p>Example: PA0575 4567</p>
Issued/distributed to	Producers who own flocks
Distribution records/reporting	Distributed through AIMS directly from approved tag manufacturer to producer
Other comments	<p>Mandatory USDA identification program for sheep and goats. Producers in the voluntary SFCP program may have tags imprinted with SFCP. All sheep over 18 months of age; sexually intact sheep under 18 months of age that are sold for breeding or exhibition; sheep sold unrestricted, sheep not in slaughter channels; and sheep that have lambed or are pregnant. Breeding goats of any age that are registered or sold for commercial milk production and sexually intact goats of any age sold for exhibition.</p>
How to obtain	Producers order tags through AVIC or State office or purchase directly from approved tag manufacturers.

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### Flock Identification Tags



XX represents State postal code.

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**Table 8. Scrapie Program Serial Tags**

Tag Information	Description
Program use	Scrapie program
Material type	Plastic or metal
Color	White for sheep and goats eligible to move as breeding animals and blue for "slaughter only" animals
Species used on	Sheep and goats
Information on the tag For describing 2-piece tags, the designation of "Tag Piece A," is the female piece typically attached to the inside of the animal's ear (visual from the front of the animal). "Tag Piece B" is the male piece typically attached to the outside of the animal's ear (visual from behind the animal).	Tag Piece A: Inside of ear; visible from the front of the animal <ul style="list-style-type: none"> <li>- U.S. shield</li> <li>- 8 characters</li> <li>- State postal abbreviation followed by a letter and number or a number and a letter, then 4 numbers (Examples: PAA12345 or PA1A2345)</li> <li>- Manufacturer's logo or trademark (printed or impression of)</li> </ul>
	Tag Piece B: Outside the ear; visible from behind the animal <ul style="list-style-type: none"> <li>- U.S. shield</li> <li>- UNLAWFUL TO REMOVE</li> </ul>
	Metal single piece – Front of tag <ul style="list-style-type: none"> <li>- 8 characters</li> <li>- State postal abbreviation followed by two letters and 4 numbers (Example: PABG0575)</li> </ul>
	Metal single piece – Back of tag <ul style="list-style-type: none"> <li>- State postal abbreviation and U.S. shield</li> </ul> Metal – inside tag, tag company name
Additional printing specifications	Blue tags are printed with "SLAUGHTER ONLY," "MEAT ONLY," or "MEAT" on the back or male part.
Issued/distributed to	Markets, dealers, veterinarians, feedlot operators and others who do not own flocks
Distribution records/reporting	Distributed through AIMS
Other comments	Mandatory USDA identification program for sheep and goats. All sheep over 18 months of age; sexually intact sheep under 18 months of age that are sold for breeding or exhibition; sheep sold unrestricted, sheep not in slaughter channels; and sheep that have lambed or are pregnant. Breeding goats of any age that are registered or sold for commercial milk production and sexually intact goats of any age sold for exhibition.
How to obtain	Producers order tags through AVIC or State office.



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**Table 9. Premises Identification Number (PIN) Tag for Slaughter Swine**

Tag Information	Description
Program use	Swine
Material type	Plastic
Color	Industry has recommended and is using pink.
Species used on	Slaughter swine
Information on the tag For describing 2-piece tags, the designation of "Tag Piece A," is the piece attached to the inside of the animal's ear. "Tag Piece B" is the piece attached to the outside of the animal's ear.	Tag Piece A: - U.S. shield - UNLAWFUL TO REMOVE
	Tag Piece B: - State postal abbreviation <sup>1</sup> - PIN - U.S. shield - UNLAWFUL TO REMOVE - Manufacturer's logo or trademark (printed or impression of) - Barcode of corresponding PIN on the reverse side.
Additional printing specifications	All tags have minimum print size specifications for required information imprinted on the tags. Other information may be imprinted on the tag if it does not reduce the readability of the required information. The herd management number is optional.
Issued/distributed to	Swine producers
Distribution records/reporting	Manufacturers report distribution of tags by product code to APHIS VS.
Other comments	
How to obtain	Producers may obtain direct from authorized manufacturers.



Tag Piece B <sup>2</sup>  
(Back of ear)



Inside of Tag Piece B <sup>2</sup>  
(Not in View while tags is on the pig)



Tag Piece B <sup>3</sup>  
(Inside of ear)

<sup>1</sup> State postal abbreviation imprinted on PIN tags shipped from manufacturer after August 1, 2009

<sup>2</sup> The piece attached to the outside of the animal's ear

<sup>3</sup> The piece attached to the inside of the animal's ear

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**Table 10. State Codes and Abbreviations** (numeric order)

11	ME	Maine	56	SC	South Carolina
12	NH	New Hampshire	57	GA	Georgia
13	VT	Vermont	58	FL	Florida
14	MA	Massachusetts	61	KY	Kentucky
15	RI	Rhode Island	63	TN	Tennessee
16	CT	Connecticut	64	AL	Alabama
21	NY	New York	65	MS	Mississippi
22	NJ	New Jersey	71	AR	Arkansas
23	PA	Pennsylvania	72	LA	Louisiana
31	OH	Ohio	73	OK	Oklahoma
32	IN	Indiana	74	TX	Texas
33	IL	Illinois	81	MT	Montana
34	MI	Michigan	82	ID	Idaho
35	WI	Wisconsin	83	WY	Wyoming
41	MN	Minnesota	84	CO	Colorado
42	IA	Iowa	85	NM	New Mexico
43	MO	Missouri	86	AZ	Arizona
45	ND	North Dakota	87	UT	Utah
46	SD	South Dakota	88	NV	Nevada
47	NE	Nebraska	91	WA	Washington
48	KS	Kansas	92	OR	Oregon
50	DE	Delaware	93	CA	California
51	MD	Maryland	94	PR	Puerto Rico
52	VA	Virginia	95	HI	Hawaii
54	WV	West Virginia	96	AK	Alaska
55	NC	North Carolina			

Note: USDA will issue Tribes a two-character numeric or alpha code if they wish to administer the issuance of their own NUES tags.