



National Cattlemen's
Beef Association

July 31, 2017

USDA-APHIS-PPD
Regulatory Analysis and Development
Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

RE: Docket No. APHIS-2017-0016, Animal Disease Traceability-USDA Public Meetings

The National Cattlemen's Beef Association (NCBA) appreciates the opportunity to provide feedback and commentary to the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (USDA, APHIS, VS) concerning the successes and challenges of the current animal disease traceability (ADT) system. NCBA is the oldest and largest national trade association representing cattlemen and women in the United States. Our members are firmly committed to maintaining the health and well-being of the cattle under their care as well as to ensuring the safety of the beef that they produce. Representatives from NCBA recently participated in a series of public meetings across the country, organized by USDA-APHIS, to hear from the public about the successes and challenges of the current ADT framework as well as to brainstorm for solutions to gaps identified in the existing ADT system.

NCBA continues to be supportive of an ADT system for cattle health purposes. Ideally, the ADT framework should create a system that reduces the number of animals involved in a disease investigation, reduces the time needed to respond, and ultimately, decreases the costs for producers and state animal health officials. Foreign governments and our trading partners expect USDA and the United States beef industry to be able to respond quickly and effectively to control disease outbreaks and to provide assurances that beef and beef products exported from the United States are safe. Additionally, the Secure Beef Supply plan, which functions to facilitate continuity of business for beef and beef products during a foreign animal disease outbreak in the United States, relies upon the successful managed movements of cattle using a robust animal identification system.

While USDA's 2017 ADT assessment report showed improvements in many of the trace performance measures (TPMs), significant gaps still exist with disease tracing capabilities under the current ADT system. Compliance is inconsistent at federally-approved slaughter plants with collection of identification devices at slaughter and maintaining correlation of the devices to the carcass through final inspection. Additionally, there is no retirement of official identification numbers at slaughter. The lack of connectivity and data sharing capabilities between multiple databases makes data management extremely complicated. Ready access, 24 hours a day and 7 days a week, for information concerning ADT by the state animal health authorities is vital to a functioning ADT system. There must be more robust data collection and sharing to improve the traceability performance. It seems that ADT cooperative funding agreement dollars are shrinking at the very time that the agency is considering the expansion of the current ADT framework. Resources must be made available to the states to handle any type of an expanded ADT framework. NCBA requests that USDA-APHIS coordinate their actions with the states to collectively address challenges and gaps in the current ADT system.

NCBA supports a flexible ADT system that addresses the following concerns of cattlemen and women:

- The ADT system is built on private sector identification and verification programs currently backed by USDA.
- Confidentiality of producer information is essential and personal producer information should be vigorously protected from disclosure.
- Cattle producers must be protected from any liability for the acts of others after their cattle have moved along the supply chain and out of their direct control.



- Implementation of the ADT system needs to consider technology and move at the speed of commerce.
- The ADT system does not replace or impede existing state brand inspection activities.
- Data integrity must be maintained throughout the system, including retagging and retirement of tags at slaughter.
- Cattle movement between adjoining states, on pasture-to-pasture permits, should be allowed to continue at the discretion of the involved state animal health officials.
- Adequate federal resources to the states must be readily available to facilitate the objectives of animal disease traceability.

NCBA encourages USDA-APHIS to follow a contemplative and collaborative approach with stakeholders as plans are being discussed to expand the current ADT framework for cattle and bison. Introducing over 26 million feeder cattle into the current ADT framework presents a whole set of unique and significant considerations, such as the increased complexities of identifying and tracing young cattle, the addition of huge numbers of cattle moving interstate, the potential for slowing the speed of commerce throughout the cattle production and marketing chain, managing the logistics of a multi-faceted feeder cattle industry, the appreciably greater costs involved and perhaps numerous, as yet, unknown factors of substantive concern. USDA-APHIS needs to revisit exactly how they plan to expand the ADT framework to include feeder cattle and allow for a separate rule-making process for this group of cattle. There definitely needs to be a clearly defined trigger threshold of proven successful implementation of the current ADT framework for adult cattle before proceeding to introduce cattle younger than 18 months into the system. All significant gaps in the current ADT system must be identified and the functions of the ADT system strengthened and made more efficient prior to expansion of the ADT framework with more than 26 million feeder cattle. Finally, at the appropriate time and with adequate resources, USDA-APHIS needs to follow a plan for the gradual transition of feeder cattle into the ADT system, utilizing input from the industry as well as state animal health officials and other involved stakeholders.

Thank you for your consideration of the comments submitted by NCBA concerning the current animal disease traceability system in the United States and any plans in the future to expand upon the current ADT framework. We look forward to a continued dialogue with USDA-APHIS concerning the issues related to animal disease traceability. For additional clarification or questions, please contact Dr. Kathy Simmons, NCBA's Chief Veterinarian at 202-347-0228 or at ksimmons@beef.org.

Sincerely,



Craig Uden
President, National Cattlemen's Beef Association