



July 31, 2017

Dr. Sunny Geiser-Novotny  
Cattle Health Staff/ADT Veterinarian,  
Surveillance, Preparedness, and Response Services,  
USDA APHIS, Veterinary Services  
2150 Centre Avenue  
Building B, Mailstop 3E13, Room 3E97  
Fort Collins, CO 80526

Reference: Docket No. APHIS-2017-0016-0001 Meetings: Animal Disease Traceability System

Dear Dr. Sunny Geiser-Novotny;

On behalf of the United States Cattlemen's Association (USCA) and our nationwide membership of cow-calf operators, backgrounders, and feedlot owners, we'd like to express our appreciation of the opportunity to comment on the ongoing Animal Disease Traceability (ADT) stakeholder meetings.

USCA appreciates USDA's efforts to identify and address weaknesses in the current system by seeking out producer feedback and input. As a grassroots organization, our policy is completely member-driven and member-approved. USCA's current stated policy on animal identification is as follows:

- Resolution #1:
  - o WHEREAS, Under the USDA's proposed Animal Disease Traceability rule, Phase 2 requires the identification of all cattle moving interstate would be initiated by a notice published in the Federal Register upon completion of the Phase 1 assessment and a determination that the ADT program can be successfully implemented in all cattle.
  - o THEREFORE BE IT RESOLVED, USCA supports a separate rulemaking for Phase 2
  - o THEREFORE BE IT FURTHER RESOLVED, USCA strongly opposes the implementation of the ADT requirements for "all cattle" in Phase 2 by Federal Register notice rather than through separate rulemaking.

Producers carry out animal traceability on their own operations every day. Tracing and tracking animals occurs on a regular basis via the filing and transfer of health papers, bill of sales, brand inspections, herd tags and lot loads. There's much more to the animal identification discussion than simply directing producers to tag livestock. We need to move the conversation beyond ear tags and talk about traceability in terms of accurate disease tracebacks, effective recordkeeping and efficient and affordable technology.

### **GAPS IN THE CURRENT FRAMEWORK**

The way cattle are bought and sold in today's marketplace also impacts the animal identification system. There is a big difference in feeder cattle being bought in smaller numbers to fill out loads versus marketed cattle that are sold as packages for semi-loads. Regardless, the flow of cattle from sale barns to feeders to finish feeders and on to packers all incorporate a degree of traceability that enables animal trace-back. It might not be in a matter of 48 hours, but generally speaking, these trace-outs can be done within a week or two.

However, USCA recognizes that increased regulations and costs within animal ID will push out smaller producers and feeders, leaving larger producers and feeders the only viable operations that can keep up with the increased labor and costs. USDA APHIS needs to also address the technology gap in the current system and encourage vendors to develop cost-effective high- and low-frequency readers and tags.

Additionally, a national animal disease traceability system should be organized on a state-by-state basis. State animal health officials should remain in charge of that data and information, so that they will have to remain responsible to producer concerns. USCA also recommends that trace information is not housed in a central database and that no private organization is contracted to control the data.

## **CONCLUSION**

With the growth of a global marketplace, our trading partners will begin to expect a more comprehensive and transparent animal identification system. Though we recognize the gaps in the current framework, we also believe there are opportunities to strengthen and establish an animal identification system that works for all producers. USCA will be expanding further on its policies at its 2017 Annual Meeting to be held this September 15<sup>th</sup> in Billings, Montana. We encourage USDA APHIS and cattle producers to be in attendance to shape this discussion.

Thank you for the opportunity to comment on the ongoing ADT Producer Meetings. For additional questions, comments, or clarification, please contact USCA's Washington, D.C. office at (202) 546-4064.

Sincerely,

A handwritten signature in cursive script that reads "Kenny Graner".

Kenny Graner  
President  
United States Cattlemen's Association