



Animal Disease Traceability

Assessment Report Executive Summary

April 2017

The objective of this assessment is to evaluate the Animal Disease Traceability (ADT) program and the effectiveness of the Code of Federal Regulations (CFR) Title 9 Part 86, Animal Disease Traceability, to enhance our tracing capabilities for emergency response, disease control and eradication programs. The assessment is based on an evaluation of traceability parameters since the publication of Part 86 through September 30, 2016.

On January 11, 2013, the United States Department of Agriculture (USDA) published the final rule, “Traceability for Livestock Moving Interstate.” Official identification requirements for beef feeder cattle were excluded from the final rule based on comments received from stakeholders. USDA acknowledged that the component of traceability for beef cattle under 18 months of age would be addressed in a separate rulemaking process or implementation phase, and would be considered after assessing whether the requirements were being implemented effectively throughout the production chain for the cattle and bison covered under the initial phase.

The ADT framework was established to improve the ability to trace animals back from slaughter and forward from premises where animals are officially identified in addition to tracing animals’ interstate movements. While the Animal and Plant Health Inspection Service (APHIS) focuses on interstate movements of livestock, States and Tribal Nations remain responsible for the traceability of livestock within their jurisdictions. This approach was designed to embrace the strengths and expertise of States, Tribes, and producers, while giving them the flexibility to find and use the most effective traceability approaches to identify animals moving interstate nationally.

APHIS established trace performance measures (TPM) to document progress in ADT, and by these measures the ADT program has been very successful in its administration in the context of the framework of official identification and movement documentation for covered livestock. Specifically the elapsed times to complete TPMs has decreased, and the percent of traces successfully completed for each fiscal year has increased. This improvement can largely be attributed to the timely retrieval of official identification records (records of tags distributed and tags applied) and movement documents through the use of databases for storing the associated information in an easily searchable format. However, while ADT has been successful in the context of the intended framework, significant gaps still exist within our tracing capabilities since the publication of 9 CFR Part 86:

- The most significant impediment resulting from the current framework is the restriction that the official identification requirement is only applicable to livestock that move interstate. Cattle movements are quite diverse, often with multiple congregation points and opportunities for local spread of disease prior to moving interstate. The requirement that official identification be limited to interstate movements also creates significant confusion in marketing channels and creates enforcement challenges and complications.

- The ADT framework relies on the use of the basic, cost-effective identification methods used in APHIS' disease eradication programs and are widely accepted by producers. However, the challenges and limitations resulting from visual-only low cost identification eartags are evident. Yet the implementation of radio frequency identification (RFID) technology, while preferred by many, also has obstacles. The implementation of a RFID solution for traceability, if undertaken, would be a significant challenge and would require a lengthy implementation period and a well thought out and detailed plan.
- Although there are other fundamental gaps in the traceability framework that need to be addressed foremost, APHIS views the inclusion of feeder cattle in the traceability regulations as an essential component of an effective traceability system in the long-term. The success of animal disease control efforts hinges on including all sectors of the cattle industry. However, it is important to note that the requirement for collecting official identification numbers on movement documents and/or interstate certificate of veterinary inspection (ICVIs) for feeder cattle will be unduly cumbersome with visual only tags and therefore should only be considered when an RFID infrastructure is in place.
- Lastly, while all federally approved slaughter plants are required to collect all identification devices at slaughter and maintain correlation of the devices to the carcass through final inspection, compliance with this regulation is inconsistent. Although successful tracing is not guaranteed by the availability of identification collected at slaughter, it provides a significant advantage for regulatory personnel in disease investigations. In addition, the termination or retirement of official identification numbers at slaughter would greatly increase tracing efficiency as it would document which animals have been removed from the population. While the termination of visual-only tags is not logistically feasible, it would systematically be achieved at the slaughter plants when the RFID technology and infrastructure is established.

APHIS is confident that the basic framework of ADT is being successfully implemented and believes discussions with industry to consider potential next steps are appropriate at this time. It is essential for producers and other industry stakeholders to offer their opinions on relevant issues to help define the level of traceability they want to achieve and how best to reach those goals. Just as APHIS worked through issues and achieved compromises in the initial ADT framework that resulted in improved buy-in and support from many stakeholders, the next phase needs to follow that collaborative approach. APHIS has numerous outreach efforts scheduled in 2017 to obtain feedback from all sectors of the industry and will be providing more information on those activities.