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FARM BUREAU®—CONFRONTING THE ISSUES

Animal Disease Traceability Policy Development 2012

Issue:

Foreign animal disease outbreaks have the potential to create massive financial losses in the livestock sector through loss of access to foreign markets, a decline in meat demand by domestic consumers, and direct production losses (death loss and morbidity). Disease outbreaks also put export markets at risk, as was amply demonstrated by the 2003 Bovine Spongiform Encephalopathy (BSE) event. Meat exports have increasingly become a key component of meat demand. In fact, the major US meat sectors have never been more export-dependent than they are now. USDA estimates that for 2012, beef exports will amount to almost 11 percent of production, a record level. Pork exports in 2012 are projected to amount to almost 23 percent of production, up from less than 10 percent a decade ago. The loss of this component of demand in the event of a disease outbreak would be devastating. It is worth noting, too, that virtually all of our major meat export market competitors (e.g. Canada, Brazil, Australia, New Zealand, and Uruguay) have implemented a traceability program; the US has not.

The combined effect of domestic and export demand declines and production losses from a disease outbreak could be dramatic. For example, it has been estimated that a Foot and Mouth Disease (FMD) outbreak alone would result in average losses to the U.S. beef and pork industries of \$12.9 billion per year. Keeping these losses to the lowest possible level would require timely and effective disease identification, containment, and eradication efforts. These efforts would rely heavily on efficient trace-back and trace-forward capabilities based on a reasonably complete animal identification system.

Last year, USDA Animal and Plant Health Inspection Service (APHIS) proposed a rule to establish minimum identification and documentation standards for animals shipped across state lines. This is not quite the same thing as establishing a uniform national identification system. In this respect, the US approach to identification and traceability is substantially different from other major livestock producing countries, which typically have adopted uniform national systems with mandatory participation. US producers, most notably in the cattle sector, have strenuously resisted mandatory programs in the past. This past resistance accounts for USDA's recent approach which, while mandatory for interstate shipment, would be administered at the state rather than federal level and would include numerous exemptions to facilitate implementation.

Background:

In 2004, following the first US case of Bovine Spongiform Encephalopathy (BSE), the federal government proposed the National Animal Identification System (NAIS). The goal of this system was to provide complete trace-back within 48 hours of an animal disease outbreak. The program would have provided a unique premise ID number to any farm in the country containing livestock. The program would have been administered at the federal level. The NAIS concept was generally supported by poultry and pork industries but was incredibly unpopular among cattle producers. In early 2010, the Congressional Research Service found that participation in premise ID registration amounted to 95 percent of poultry operations, 80 percent of swine operations, and 18 percent of cattle operations. In response to the strong resistance to NAIS, USDA essentially abandoned the program in February 2010.

In August 2011, USDA proposed a new Animal Disease Traceability (ADT) rule to replace the withdrawn NAIS program. The proposed rule establishes minimum national standards for identification and documentation of animals moving in interstate commerce. Administration of the identification program and responsibility for traceability in the event of a disease outbreak would remain with relevant state authorities. The federal government would develop traceability standards, but state/tribal authorities would actually run the program.

Under the proposed program, identification would not be required until animals are shipped between states. Cattle shipped interstate would, in general, be required to have an official eartag. There are some exceptions to this individual tag rule. For now, animals under 18 months of age and those going directly to a “recognized slaughtering establishment” would not have to be identified; though USDA notes that this is only an interim situation. At some point in the future, a rule governing identification of these currently exempt classes will be put forth. Another key exception to the individual tag rule is that states may make agreements among themselves on what constitutes acceptable identification for the shipment of animals between those particular states. In general, this would be used to accommodate states that require branding and accept brands as an official form of ID.

When interstate shipment occurs, animals will have to be accompanied by an interstate certificate of veterinary inspection (ICVI) which would be issued by an accredited veterinarian and would include the unique identification for the animal(s) being shipped. Alternatives to the ICVI are mentioned similar to the exceptions made for identification. For example, individual states can enter into agreements with other states to accept alternatives to the ICVI. More significantly, USDA proposes not requiring the listing of individual ID numbers for loads of cattle going directly to slaughter or to “an approved livestock facility approved to handle ‘for slaughter only’ animals and then directly to a recognized slaughtering establishment,” which could presumably include commercial feedlots.

The US approach of establishing national standards applied essentially only on interstate shipments and then leaving the satisfaction of those standards to state officials appears to be unique in the world. Most major livestock producing countries have national programs that are mandatory or that are transitioning to mandatory. Canada, Brazil, Australia, New Zealand, and Uruguay all fit this description. Programs in these countries also generally include not only an animal identification requirement but also a premise registration similar to that offered in the now-abandoned NAIS program.

Questions:

1. Is the mandatory identification of animals for interstate shipment in USDA’s proposed traceability system acceptable to Farm Bureau under current policy? Should AFBF clarify policy to address the mandatory nature of the ADT system for interstate movements?
2. Are the exemptions in the proposed rule (outlined in background below) broad enough to make implementation manageable? Are they too broad to provide the data that will be required to achieve full traceability?
3. Can states coordinate to provide timely and complete trace-back capability in the event of a disease outbreak?

Farm Bureau Policy:

309 – Livestock Identification - deals with disease traceability issues. The fundamental principles of Farm Bureau policy on this issue are summarized as follows:

Lines 12-20: We support the establishment and implementation of a voluntary national animal identification system capable of providing support for animal disease control and eradication. Individual states and/or tribes should have control of the animal ID program, not a private “for profit” company. We support the opportunity for each state to decide the entity controlling their respective animal ID program database. However, in the event of a disease outbreak, the controlling entities must be equipped to communicate and utilize the system to track and trace animals in a timely manner.

Other key principles supported in Farm Bureau policy:

Cost share to defray ID expenses for producers.

Collect only information necessary for disease trace-back and exempt producer information from the Freedom of Information Act.

Consolidate with current animal disease programs (e.g., scrapie, TB, Brucellosis) so that there is only one program.

Exclude animals under 18 months of age and those going directly to slaughter.

No ID required until animals are shipped across state lines.