

UNITED STATES ANIMAL HEALTH ASSOCIATION (USAHA) - 2007

RESOLUTION NUMBER: 48 APPROVED

SOURCE: COMMITTEE ON LIVESTOCK IDENTIFICATION

SUBJECT MATTER: OFFICIAL BRUCELLOSIS VACCINATION '840'
RADIO FREQUENCY IDENTIFICATION TAGS

DATES: RENO, NEVADA, OCTOBER 18 – 24, 2007

BACKGROUND INFORMATION:

The ongoing cooperative brucellosis eradication program has made great strides in elimination of the disease. Currently 49 states, Puerto Rico, and the Virgin Islands are classified as Brucellosis-Free. However, an ongoing potential threat concerns both state animal health officials and cattle producers in the western United States. Private practitioners, producers and state animal health officials have all identified the need for and have voiced support for development of an "Radio Frequency Identification Device (RFID) Official Brucellosis Vaccination Tag" that visually identifies the state where the animal was vaccinated. Such a tag, if made available for use on a voluntary basis, would offer the choice for the producer and his veterinarian to replace the metal clip tag in current use with an RFID tag. Over a period of time this would allow for the identification of a large number of "momma cows" on producer operations. The use of an Official RFID Brucellosis Vaccination Tag over the next four to five years would have a significant impact on acceptance of RFID to enhance the brucellosis eradication program as well as identifying 60-70% of adult female cattle on producer operations where calfhood vaccination is practiced. The majority of livestock health officials, brand inspectors and livestock producers are familiar with the "state two digit code" and routinely use this information to identify the state where the cattle were vaccinated.

Benefits of an RFID Official Brucellosis Vaccination Tag would include: maintenance of the familiar state coded tags and the current vaccination reporting system; increase acceptance of RFID technology by accredited veterinarians; aid in transition from metal ear tags to 840 coded RFID tags; enable automated reporting of brucellosis vaccination by accredited veterinarians; increased utilization of electronic identification systems; and enabling transition over time to electronic systems for those who are not inclined to utilize newer technology.

RESOLUTION:

The United States Animal Health Association (USAHA) encourages the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) to make available to accredited veterinarians a Radio Frequency Identification Device (RFID) Official Brucellosis Vaccination Tag that is orange in color and carries the two digit state code, as an option, for use as an official identification device for official vaccination of heifer calves.

USAHA also urges that USDA-APHIS-VS subsidize these tags so that they are available through appropriate channels to accredited veterinarians at a reasonable cost, which is estimated to be between twenty-five cents and fifty cents per tag (\$0.25-0.50/tag)

Additionally, USAHA urges that USDA-APHIS-VS work with data service providers to expedite integration of disease management systems through the creation of a new brucellosis reporting module which would include online ordering of tags, online printable report forms and online reporting of brucellosis vaccination.

RESPONSE:

USDA, APHIS, Veterinary Services

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service, Veterinary Services recognizes the United States Animal Health Association's concerns and appreciates the opportunity to respond. USDA agrees that integration of radio frequency identification (RFID) technology and standardized data elements (e.g., the 840 animal identification number (AIN) format) into Federal disease programs will greatly improve data accuracy and overall program efficiency, resulting in enhanced tracing capabilities. In fact, the lack of uniformity in data standards was one of the justifications for creating a National Animal Identification System (NAIS). Industry and State and Federal animal health officials agreed in multiple public forums that a primary goal of NAIS was to create one standard for official animal identification for all animal disease programs; the approved NAIS-compliant AIN devices available now are official for use in all disease programs, including the brucellosis program. The proposed development of an additional official identification standard for an RFID official brucellosis vaccination tag is inconsistent with the NAIS objective.

According to the brucellosis regulations in title 9 of the *Code of Federal Regulations* (CFR) Part 78.1, the tattoo is the determinant of official calfhood vaccination (OCV), rather than the presence or color of an official eartag. Although the proposed orange brucellosis RFID tag could have merit as an additional OCV status indicator in some cases, in general its utility would be limited for several reasons:

- 1) Calves can presently be officially identified (tagged) prior to OCV and do not require retagging for OCV purposes; therefore, heifers could frequently be officially calfhood vaccinated without having an associated orange RFID eartag.
- 2) USDA cannot restrict the use of various colored tags; thus it is unlikely that using color on an RFID tag to designate OCV status would have much value. If the primary goal is to have a color associated with official designation of calfhood vaccinates, the least expensive option based upon all considerations is to use an orange metal tag that indicates the animal was vaccinated for brucellosis in combination with an already available RFID device.
- 3) The designation of an official brucellosis vaccination tag would necessitate the RFID device being applied in the right ear to be consistent with the CFR. A change to the CFR would be needed to avoid this practical complication in properly placing an RFID tag in the right ear with the brucellosis vaccination tattoo. On the other hand, NAIS-approved RFID devices can be applied in the left ear, providing optimal space in the right ear for the official tattoo.

With regard to the recommendation to create a new brucellosis reporting module, USDA, as described in the Traceability Business Plan, is developing a Mobile Information Management System for brucellosis vaccination and testing that will provide electronic data transmission to the animal health databases.

Fortunately, industry, State, and Federal efforts have reduced the number of U.S. brucellosis-infected cattle herds to zero and all 50 States are now recognized as brucellosis free. This success and the future surveillance needs of the program should be considered when exploring the need for new program standards. The continued need for disease program-specific official identification devices should be discussed further, especially since currently available AIN RFID tags meet the requirement for official identification of brucellosis vaccinates. USDA encourages State animal health authorities to incorporate RFID technology using existing, approved AIN RF tags to meet the needs associated with this resolution.