

UNITED STATES ANIMAL HEALTH ASSOCIATION - 2008 RESOLUTION

RESOLUTION NUMBER: 30 APPROVED

SOURCE: COMMITTEE ON LIVESTOCK IDENTIFICATION

SUBJECT MATTER: CLARIFICATION OF AUTHORITY FOR USE OF THE NATIONAL ANIMAL IDENTIFICATION SYSTEM PREMISES IDENTIFICATION NUMBERS IN PROGRAM DISEASES AND EMERGENCY PROGRAMS

BACKGROUND INFORMATION:

Recognizing premises identification numbers (PINs) as a primary component of disease eradication efforts, and realizing that many states have statutory language that requires the National Animal Identification System (NAIS) to be a voluntary program, many states must have a clear mandate from the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) that this component of NAIS must be mandatory in order for some states to move forward.

Stakeholders of NAIS through the United States Animal Health Association (USAHA) have long encouraged USDA-APHIS-VS to prioritize NAIS efforts on animal health. Previous resolutions from the USAHA indeed requested USDA-APHIS-VS implement mandatory use of NAIS components in animal health programs. The final Business Plan of NAIS is consistent with these principles. USDA-APHIS-VS is commended for the basic NAIS Business Plan and for VS Memorandum 575.19, which specifies assignment of PINs for animal health program activities.

RESOLUTION:

The United States Animal Health Association (USAHA) requests the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) provide a letter clarifying the legality of VS Memorandum 575.19, and comparing the legal authority of a VS Memorandum to Code of Federal Regulation (CFR) requirements for assignment of premises identification numbers (PIN). Additionally, this letter must address whether USDA-APHIS-VS will respond and defend challenges to the assignment of a PIN and to the confidentiality of such.

USAHA also requests that USDA-APHIS-VS respond in a timely fashion to this request and issue a letter of findings directly to all state animal health officials.

RESPONSE:

USDA, APHIS, Veterinary Services

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the United States Animal Health Association's concerns.

VS Memorandum No. 575.19 dated September 22, 2008, was canceled by the issuance of a revised memorandum on December 22, and all State animal health officials were notified of the change.

The *Code of Federal Regulations* provides two formats for premises identification numbers (PIN). One format, the State PIN, uses the two-letter postal code of the State in which the premises is located, followed by a number assigned to the premises by a State animal health official. The second is a nationally standardized PIN that is assigned through a PIN allocator.

The integration and use of the standardized PIN in the administration of disease program work is one of the key strategies in the *Business Plan to Advance Animal Disease Traceability*. The revised memorandum provides clarification to VS personnel directing the use of the standardized PIN for all locations involved in VS animal disease program activities conducted by VS personnel. The revised memo further clarifies that State Animal Health Officials remain responsible for determining if the standardized PIN or State PIN is used when they or an accredited veterinarian conducts the disease program or activity.

APHIS has published a proposed rule that, when final, would establish the standardized PIN as the sole premises identification format.