
RESOLUTION NUMBER: 34

APPROVED AS AMENDED

SUBJECT MATTER: Continuation of Proposed Electronic Identification Transition Timeline

BACKGROUND INFORMATION:

In April 2019, the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) announced a timeline to transition to the mandatory use of electronic identification (ID) tags for cattle covered under the 2013 Animal Disease Traceability (ADT) Rule. While not accompanying the announcement, this timeline was the product of over two years of due process during which time nine regional meetings were held nationally from April 2017 through July 2017, state and local meetings were held with feedback provided, and 462 written comments were received. A sixteen member state-federal working group was formed; the working group held fifteen meetings over seven months, and contributed more than 500 hours of work, resulting in a comprehensive document which summarized the issues, needs, and options of the current ADT program and detailed 14 points as recommendations. Further discussion and feedback was generated through three public traceability summits, and Undersecretary Ibach produced a list of agency-specific objectives to enhance traceability. Finally, an additional state-federal working group was formed to specifically address one of the objectives: a plan to transition to electronic ID. This working group again received input from all sectors of industry before generating the proposed timeline which was adopted by the USDA.

While not unanimous, the transition timeline was met with significant positive responses and as outreach efforts continued, industry support grew as State Animal Health Officials, livestock market operators, industry organizations, and practicing veterinarians committed to engage in a successful transition.

The groups previously mentioned have invested considerable resources to ensure a smooth transition as defined by the timeline. Significant time and energy has been devoted to explaining the timeline to stakeholders and activities have already begun to accomplish the first step of the transition - ending free National Uniform Eartagging System (NUES) tag distribution by 12/31/19.

In late October 2019 it was announced that the timeline was being suspended until USDA could evaluate the method in which the timeline was proposed and determine what steps were necessary to ensure a transparent process was utilized to arrive at the timeline and to satisfy any legal challenges.

The withdrawal of the transition timeline creates confusion, doubt, and lack of trust amongst stakeholders and continues to leave unaddressed a major gap in the nation's resilience to an incursion of a high consequence animal disease.

RESOLUTION:

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), State Animal Health Officials, and livestock industries to move as quickly as possible to continue the momentum toward electronic identification and to work together to institute a modified transition timeline with the same end date of January 1, 2023 and the extension of National Uniform Eartagging System tag distribution being no more than 12 months or no later than December 31, 2020.

INTERIM RESPONSE:

USDA, APHIS, VS recognizes the concerns of USAHA and appreciates the opportunity to respond. In an effort to continue the momentum toward increasing the amount of electronic identification used in cattle and bison, APHIS plans to post notice in the Federal Register requesting public comment on a timeline to transition radio frequency identification (RFID) as the official identification device. After receipt and review of stakeholder comments, APHIS will implement a decision on the path forward that best meets stakeholder's needs. Currently, APHIS continues to provide the free metal National Uniform Eartagging System (NUES) tags, as well as we now offer an option for free RFID tags in lieu of the metal NEUS tag.

FINAL RESPONSE:

USDA, APHIS, VS recognizes the concerns of USAHA and appreciates the opportunity to respond. On July 6, 2020, APHIS posted a notice in the Federal Register requesting public comment on whether to transition to radio frequency identification (RFID) as the only approved official identification device in cattle and bison, as well as a proposed timeline for this transition. The Notice is open for public comment for 90 days with the comment period closing on October 5, 2020. After receipt and review of stakeholder comments, APHIS will implement a decision on the path forward that best meets stakeholder's needs. Currently, APHIS continues to provide free metal NUES tags and offers the option of free RFID tags in lieu of the NUES tags.