
RESOLUTION NUMBER: 7 and 36 Combined

APPROVED AS AMENDED

SUBJECT MATTER: Strengthening the United States Animal Disease Traceability and Disease Prevention Infrastructure

BACKGROUND INFORMATION:

State Animal Health Officials (SAHO) and livestock industry members work collaboratively with the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) to protect the health of the nation's livestock, and a comprehensive animal traceability system is critical to this collective mission. While many domestic components of the United States (US) traceability system are robust and successful, the current regulatory framework and practices applicable to livestock moving through US ports of entry allow animals from foreign countries to move throughout the US without traceability or the knowledge of state and federal animal health authorities. These traceability gaps may negatively impact trade and the health of domestic livestock by hampering state and federal animal health officials' ability to effectively manage a domestic or foreign animal disease outbreak.

Language in Title 9 Code of Federal Regulations § 93.405, *Health Certificate for Ruminants*, only requires imported sheep and goats moving through US ports of entry to be accompanied by accurate certificates of veterinary inspection. Other livestock species are exempt from this requirement. Lack of minimum traceability standards for all imported species enables livestock to be diverted once in domestic markets without the knowledge of SAHOs. The lack of enforceable regulatory language has also impeded APHIS' Investigative and Enforcement Services from being able to take action against persons who knowingly import livestock illegally when cases are referred by SAHOs.

Requiring accurate data on movement documents for imported livestock is critical, but appropriate information sharing between federal officials managing livestock movement through US border ports and SAHOs responsible for overseeing the domestic movement of imported livestock is also imperative to ensure comprehensive animal traceability. SAHOs are not always notified in a timely manner of international livestock movement into their states, and federal animal health officials do not consistently share movement paperwork with state offices. This hampers SAHOs' ability to meet the expectation of federal partners to properly manage the domestic animal disease traceability program and to trace animals in instances of livestock diversion.

The United States Animal Health Association appreciates the work that USDA APHIS VS does to protect domestic livestock health and promote a robust animal traceability

-continued-

system. We are optimistic that USDA APHIS VS' willingness to pursue timely and reasonable regulatory and practice changes at US border ports will further protect domestic livestock from the risks of imported diseases while minimizing regulatory burdens on trade.

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) to 1) amend the language in Title 9 Code of Federal Regulations to require that every imported livestock animal travel with an official certificate of veterinary inspection containing comprehensive traceability information, including complete individual official animal identification and accurate consignor and consignee physical addresses; and 2) transmit a copy of the certificate of veterinary inspection to the state animal health official of the animal's destination state within twenty-four hours of the import.

INTERIM RESPONSE:

VS understands USAHA's concerns around the language in Title 9 CFR) § 93.405, *Health Certificate for Ruminants*. The language in this regulation requires imported sheep and goats moving through U.S. ports of entry to be accompanied by accurate certificates of veterinary inspection.

However, 9 CFR 93.407 *Declaration and other documents for ruminants* requires imported ruminants to be accompanied with two copies of a declaration. The declaration should list all of the following: port of entry, the name and address of the importer, the name and address of the broker, the origin of the ruminant(s), the number, breed, species, and purpose of the importation, the name of the recipient, and the delivery location. To ensure compliance, VS will send a reminder notice to U.S. importers of the requirement for complete individual official animal identification and accurate consignor and consignee physical addresses. VS will also remind staff that approve import permits and review port of entry documentation to ensure traceability information is complete.

VS' Veterinary Service Process Streamlining (VSPS) system allows all State Animal Health Officials (SAHOs) to have immediate access when an animal is imported from another country into their state. VS is willing to provide further training to SAHOs to efficiently use VSPS. VS requests SAHOs continue to alert us when livestock is illegally imported so that APHIS can implement enforcement actions.

FINAL RESPONSE:

On April 29, 2020, APHIS issued an import alert regarding the use of known invalid destination addresses. This alert notified stakeholders that any animal(s) with a known invalid destination address listed on import documentation will be held at the port of entry, or subject to return to Mexico or Canada if entering via a land border port, until the importer of record provides a valid destination address.

In fiscal year (FY) 2021, APHIS will look to amend the language in title 9 *Code of Federal Regulations* to ensure the exporting country issued health certificates for all live animals contain comprehensive traceability information including complete individual official animal identification and accurate consignor and consignee physical addresses. Please continue to alert APHIS when SAHOs are informed of persons who knowingly import livestock illegally to support enforcement actions.

In the interim, APHIS has tools to ensure traceability of imported animals and availability of such records to SAHOs. The VS Process Streamlining (VSPS) system allows all SAHOs to view immediately an animal that is imported into the country destined to their State. In FY 2021, APHIS will provide a training webinar and discussion for SAHOs on the utilization of VSPS. However, virtual training specifically for SAHOs was recorded and is located in the VSPS Library: VSPS Training for SAHOs.

The Animal Health Services (AHS) application with mobile capabilities will be released the first quarter of FY 2021 and includes the ability for accredited veterinarians to create interstate certificates of veterinary inspection (ICVI) in a mobile platform. This will allow the ability for ICVIs to be created for imported animals at sorting pens after entry into the United States if required by the State of destination. The Enterprise Messaging Service then allows for sharing the data by messaging it from AHS and VSPS to State and Federal systems as requested.

Additionally, the Animal Health Event Repository (AHER) integrates data received into multiple VS databases and offers the ability for SAHOs to query animal identification numbers to simplify the trace investigation process. States and third-party stakeholders are also beginning to provide data to AHER, expanding the pool of available animal identification number records, which enhances tracing efficiency.