BACKGROUND INFORMATION:

On March 11, 2013, the United States Department of Agriculture (USDA) Animal Disease Traceability (ADT) rule became effective. Unless specifically exempted, livestock moving interstate must be officially identified and accompanied by an interstate certificate of veterinary inspection or other approved documentation. Beef cattle less than 18 months of age and not for exhibition are exempted from official identification (ID) requirements. At this time, States may issue USDA official National Uniform Eartagging System (NUES) tags or official 840 radio-frequency identification (RFID) tags to producers and veterinarians to identify livestock. The ADT rule prohibits the application of multiple official ID devices with few exceptions.

However, the use of multiple RFID tags of the same frequency in one animal can be problematic. Resources and technology are not currently available to use and read both low frequency and ultra high frequency tags within the management system typical of export facilities.

Despite the high retention rate of RFID tags, they are frequently lost during management of thousands of animals. Identifying the exact animal with a lost RFID in a small, closed herd may not be a problem. However, when dealing with large groups assembled from multiple herds, application of a second official ID would help ensure individual animal traceability.

Cattle and bison being exported undergo health testing, and the official ID is associated with the sample being tested at an approved laboratory. If an animal loses their single official ID between the time of health testing and final export inspection, it is impossible to demonstrate that the animal has undergone the required health testing. The loss of a single official ID tag can stop an entire shipment, because an unidentified animal with an unclear health status would jeopardize the status of the group.

This scenario was not envisioned with the proposed phasing out of NUES tags as official ID. The United States Animal Health Association supports RFID as the official ID for cattle and bison, but the use of a secondary official identification device is vital in cattle and bison in export channels. The use of a second official ID in cattle and bison exports will help maintain individual animal traceability and prevent stopped shipments.

RESOLUTION:

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA) and state animal health officials (SAHOs) to work with livestock exporters and producers to identify a secondary official identification option for animals being exported to account for the risk of losing the primary official identification. USAHA has supported use of the USDA
approved RFID tag as the primary method of official ID with resolutions 34 and 35 in 2019. For cattle exporters, low frequency RFID tags have long been the international standard for cattle ID. The transition to RFID tags as the primary official ID tag is long overdue and an important step in protecting the health of our animals and the strength of our industry.

USAHA requests that, by the end of the first quarter of calendar year 2021, the USDA initiate this collaboration with SAHOs, livestock exporters, and producers who export to help identify a secondary official identification solution so that it is available prior to and in the event of National Uniform Eartagging System tags being phased out for all purposes.

INTERIM RESPONSE:

USDA, APHIS, Veterinary Services (VS) recognizes the concerns of USAHA and appreciates the opportunity to respond. The Animal Disease Traceability rule (9 C.F.R Part 86) covers identification of livestock for interstate movement. These requirements are also applied to livestock for official identification for other purposes, including export. The current rule allows for some notable exceptions for “use of more than one official identification” (9 C.F.R. Part 86.4 (c) (2)). Using this framework, VS currently collaborates with SAHOs, livestock exporters, and producers to ensure there is a backup identification system in place for animals being exported if metal tags are discontinued as USDA official identification.