

RESOLUTION NUMBER: 10 and 34 Combined **APPROVED**

SOURCE: COMMITTEE ON IMPORT EXPORT
COMMITTEE ON TUBERCULOSIS

SUBJECT MATTER: TUBERCULOSIS TESTING OF EXPORT CATTLE
AND THE REQUIREMENT FOR A NEGATIVE
CULTURE OF *MYCOBACTERIUM BOVIS* FROM
HISTOPATHOLOGICALLY NEGATIVE TISSUES

BACKGROUND INFORMATION:

Between 1987 and 2011 exporters were following rules as per Veterinary Services (VS) Memorandum 592.102 dated 10/29/93:

“The test is valid for 90 days unless specified by the importing country. The CFT test should not be repeated less than 60 days following the previous tuberculin injection. The comparative cervical (CC) test must be run on CFT suspects and all must be negative before the remaining negative animals can be shipped. CFT suspects cannot be shipped even if negative on the CC test. CC test suspects may be sent to slaughter under permit, and if found without internal evidence of TB including histopathological examination of selected lymph nodes, the animals in the rest of the shipment may be considered free of TB.”

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) is now telling exporters that if a caudal fold test (CFT) suspect undergoes the comparative cervical (CC) test and responds as a suspect on this test, the remaining animals are not permitted to be exported until the tissues from the CC suspect undergo a negative culture for *Mycobacterium bovis* even if they are histopathologically negative. This culture takes 6-8 weeks to complete (Russia requires Tuberculosis [TB] testing during the 21 days prior to embarkation), and because all of the remaining animals are rendered ineligible for export until a negative culture is completed, an exporter is at risk of losing \$5-6 million. If this happens, the remaining exporters will be unwilling to face such a huge risk and will abandon the export business.

To date and after many requests, USDA-APHIS-VS has been unable to produce any documentation of cases in which a positive culture was obtained from tissues that were histopathologically negative for TB. Therefore, the probability of the remaining “test negative” animals in the shipment being capable of transmitting TB is insignificant. In all

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the years of following VS Memorandum 592.102, there has not been an incidence of a TB-positive animal being exported to another country.

RESOLUTION:

The United States Animal Health Association urges the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) to eliminate the requirement for a culture for *Mycobacterium bovis* on histopathologically negative tissues, and to return to the Tuberculosis directives of VS Memorandum 592.102 dated 10/29/93.

INTERIM RESPONSE:

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association and appreciates the opportunity to respond. VS is developing a risk assessment to determine the risk associated with discontinuing bacterial culture in comparative cervical test suspects with no gross lesions and negative histopathology. VS will complete its analysis of the risk assessment by July 2013 and will inform United States Animal Health Association of its decision.