

Cattle Industry ID Principles: Further Defined
Cattle ID Group
May 7, 2010

A group of cattle industry organizations (the Cattle ID Group) representing the beef, dairy and marketing sectors came together in November 2009 to develop consensus on a cattle specific identification (ID) plan recognizing the diversity in which cattle are raised, marketed and processed. The original signatories to the cattle ID plan (American Angus Association, American Farm Bureau Federation, Dairy Farmers of America, Livestock Marketing Association, National Cattlemen's Beef Association, R-CALF USA, Texas Cattle Feeders Association and U.S. Cattlemen's Association) agreed that an ID system for interstate movement must be based on 12 broad guiding principles.

With USDA's February 2010 announcement of a new regulatory framework for the ID/traceability of livestock moving interstate, the Cattle ID Group, now joined by the National Livestock Producers Association and the Texas and Southwestern Cattle Raisers Association as signatories to this statement, returned to their original "12 cattle ID principles" to further explain and define those issues distinct to USDA's new Animal Disease Traceability (ADT) framework. The following represents the Cattle ID Group's original "12 ID Principles", as seen in **bold** type, as well as the new further defined information from the latest discussions of the Group in the *italicized, bulleted* items:

1. Additional costs to the beef and dairy industry must be minimized.

- *The Cattle ID Group supports the use of currently available low-cost, low-technology official tagging devices, such as the metal "Brite" tags, tattoos, brands, back tags, etc. and ID data management systems to minimize the economic impact on the cattle industry of any new ID/traceability requirements.*
- *Additional costs to the beef and cattle industry resulting from increased handling of cattle, resulting shrinkage, additional recordkeeping, increased personnel needs, duplication of existing ID devices and requirements, and significant structural and operational modifications must be minimized to the greatest extent possible in order to maintain the economic viability of the entire U.S. cattle industry.*
- *Identification of only adult cattle (see definition of adult cattle under Principle No. 6), for the foreseeable future, for interstate movement would be a significant step forward in minimizing the cost to the cattle industry, the states and ultimately to the consumer.*

2. Any information relative to cattle identification information should be under the control of state animal health officials and be kept confidential.

- *USDA should similarly protect the confidentiality of information collected and maintained by USDA for the purposes of carrying out the ADT program.*

3. The system must operate at the speed of commerce.

- *The commercial movement of cattle must proceed without significant disruption and/or delay as they move through production, marketing and processing channels. Restricting identification for interstate movement to adult cattle will significantly*

enhance current traceability for the greatest disease-risk cattle population and allow for the least disruption to the speed of commerce for all cattle moving interstate. For these reasons, the Cattle ID Group strongly opposes the mandatory tagging and recording of feeder cattle moving interstate as it would drastically disrupt the speed of commerce; could potentially radically restructure the cattle industry; is technologically unsupportable; and would surely be economically devastating to producers and market operators during an emerging recovery of the national economy .

4. Brucellosis/Tuberculosis surveillance and control should be the model upon which to build an interstate movement identification program.

a) Additionally, existing programs within our industry have proven to be historically successful in livestock identification. These programs should be recognized and utilized. [The U.S. Department of Agriculture’s National Animal Health Monitoring System (NAHMS) February 2009 study of “Cattle Identification Practices on U. S. Beef Cow-calf Operations” reported that there is currently a high level of some form of cattle identification in cow-calf operations in the United States. The survey of 24 major beef producing states represented 79.6 percent of U.S. operations with beef cows and 87.8 percent of U.S. beef cows. The study found that two-thirds of the operations (66.1 percent) used some form of individual identification on at least some cows. Overall 79.1 percent of all beef cows surveyed were individually identified by one or more methods, with 58.6 percent of the beef cows using an official identification, such as a Brucellosis vaccination ear tag.]. Nearly half of the operations (46.7 percent) used at least one form of individual animal identification on calves, which accounted for 64.8 percent of calves being individually identified. 61.3 percent of all cattle and calves had some form of herd identification.]

b) The cattle industry recognizes that improvements can be made to these programs and is committed to systematically improving the coverage, speed and accuracy of these processes.

- *See Principal No. 6.*

5. Any enhancements of historical identification systems must be phased-in over a proper time-frame.

- *Again, without a methodical, incremental, seamless approach to the enhancement of current ID/traceability systems, significant disruption to the cattle industry would occur and, just as importantly, would be strongly opposed by most stakeholders responsible for the cost and operation of the system.*

6. The first step in improving cattle identification is the individual identification of adult cattle (breeding age cattle 18 months or older, excluding those going into terminal feeding channels) by using the historically established federal and state cattle disease programs as models, such as the Brucellosis and Tuberculosis programs as they existed prior to any NAIS modifications. The goal is to accomplish this voluntarily for all adult cattle changing ownership by 2015. (As we accomplish the adult cattle goal as an industry, we commit to evaluating the

phased-in addition of other ages of cattle based on an industry evaluation of the cost/ benefits, feasibility and value to continually improving U.S. cattle herd disease surveillance, control and eradication.)

- *Principles No. 4 and 6 are combined in a further elaboration of the Cattle ID Group's views on the importance of beginning with adult breeding cattle in any improvements to cattle ID/traceability. Upon further reflection, the Cattle ID Group has agreed that adult breeding cattle moving interstate should be defined similarly to current federal ID requirements for certain cattle 2 years or older: "Individual Identification of certain cattle 2 years of age or over for movement in interstate commerce, 9 C.F.R, pt. 71.18." Thus the Cattle ID Group's new definition for adult breeding cattle is as follows: "Cattle 24 months of age or older, except steers, spayed heifers, and heifers going back into stocker/feeding channels."*
- *It is recognized that USDA's new ADT framework would be mandatory for adult breeding cattle moving in interstate commerce.*

- 7. Producers must be protected from liability for acts of others after cattle have left their control.**
- 8. The purpose should be solely cattle disease surveillance, control and eradication. The only data required to be collected should be that necessary to accomplish this goal.**
- 9. Maintain the historical state flexibility allowing State Animal Health Officials discretion in assigning an identifier for the person responsible for livestock.**
 - *An identifier based on the animal(s) owner's name and address at the time of the animal's movement is recommended.*
- 10. The 48-hour Foot and Mouth Disease traceback model is currently unachievable. The goal of this program should be to enable the cattle industry, state and federal animal health officials to respond rapidly and effectively to animal health emergencies.**
 - *Performance measures for cattle traceability should be based on achievable goals and compliance for all sectors of the cattle industry as well as state regulatory authorities and reflect the need to minimize cost to the industry, maintain the speed of commerce and effectively respond to animal disease emergencies.*
- 11. Renewed emphasis on preventing the introduction of foreign animal diseases of concern.**
- 12. We support the flexibility of using currently established and evolving methods of official identification.**
 - *As the states establish what official ID devices will be permitted for traceability of cattle moving interstate, consideration must be given to implementation costs, maintaining the speed of commerce, operational challenges, overall impact on the cattle industry, etc.*