



Cattle Traceability Working Group

CTWG Collection Technology Position on ADT Point 2 – “Cattle Population Covered in the Official ID Regulations”

Voting Concluded – October 8, 2018

**17 Votes in favor
1 Vote oppose**

Position Point #2 Passes as written below:

After having numerous discussions during multiple teleconference calls concerning the addition of beef bulls and heifers under 18 months of age ROG is in support of the position the Animal Disease Traceability State and Federal Working Group that this sector should be included in a mature ADT system at some point in time, however not until other building blocks of the system, such as an Electronic Identification system, are in place.

Specifically, ROG takes the position that beef bulls and heifers under 18 months of age, regardless if moving into commerce for breeding purposes or not, should not be added to the current ADT system until a workable EID system is in place. ROG will address its concerns for such a system in its discussions of Proposal#3.

Further ROG would agree to adding beef bulls and heifers under 18 months of age that are to be used for breeding purposes into the ADT system upon the following criteria being met:

1. USDA suggest a system of identification such that the responsibility of identifying beef bulls and heifers under 18 months of age to be used only for breeding purposes fall solely on the seller and/or buyer. ROG accepts that actual tagging may be accomplished by other than seller or buyer at their direction.
2. USDA to conduct a rulemaking process in the Federal Register with 90-120 days comment period that addresses the timing, responsibility, and methodology of adding beef bulls and heifers under the age of 18 months (both for breeding purposes and slaughter) is addressed before introducing these animals into the current ADT system.

**CTWG Collection Technology Position on ADT Point 12 –
“Uniform Official Identification Eartags”**

Voting Concluded – March 11, 2019

**13 Votes in favor
3 Votes oppose
4 Votes abstaining**

Position Point #12 Passes as written below:

The CTWG understands the current USDA position of “Technology Neutrality” which allows for the use of visual and electronic identification, including both Low Frequency and High Frequency Radio Frequency Identification (RFID) tags as official Identification devices under the ADT program. It is further well understood that trials are underway – supported by both private and governmental entities – to evaluate the use of these specific RFID technologies under the ADT program; the CTWG believes these trials should be allowed to continue to completion, and the information learned/conclusions reached from these varied activities (across all segments of the market, including commercial activities on farm and throughout all production channels) should be evaluated in the context of reconsidering whether industry may wish to consider one uniform tag as noted in the ADT document Proposal. The CTWG further recommends that USDA does not sunset any existing official tag technology until a decision is taken – jointly by Industry and Government - regarding the specific technology to be used (“one standard, uniform tag”) under the ADT program.

**CTWG Collection Technology Position on ADT Point 13 –
Official EID for Imported Cattle**

Voting Concluded – April 1, 2019

**9 Votes in favor
1 Votes oppose
1 Votes abstaining**

Position Point #13 Passes as written below:

The Collection Technology Working Group of the CTWG broadly supports the establishment of an Import RFID Tag for use in identifying foreign cattle, utilizing a specific color tag, the coding of 840 9XX XXX XXX XXX, and printing “IMPORT” on all

eligible devices. We further stress that we also should continue to require visual brand – for example, “M” signifying Mexican cattle and “CAN” signifying Canadian cattle - in addition to the Import RFID Tag.

**CTWG Responsibilities and Opportunities (ROG) Position on ADT Point 3 –
Limiting Official Identification Requirements to Interstate Movements**

Voting Concluded – April 23, 2019

**11 Votes in favor
1 Votes oppose
0 Votes abstaining**

Position Point #3 Passes as written below:

ROG opposes moving federal authority to interstate “commerce” rather than interstate “movement” as the triggering event for livestock being covered as this will increase confusion.

ROG supports a “bookend system” whereby, when possible, covered cattle (those cattle currently required to be tagged under 9 CFR Part 86) are identified to the birth premise. Ideally, animals would be voluntarily identified upon leaving the birth premise. ROG further supports Federal and State authorities working towards achieving this goal.

If at some point, following perfection of the identification system for currently covered animals, industry considers mandatory identification to farm of origin upon leaving the birth premise (or at an official tagging site), this would require a formal rulemaking process.

**CTWG Responsibilities and Opportunities (ROG) Position on ADT Point 9 –
Exemptions for Official Identification Requirements**

Voting Concluded – April 30, 2019

**11 Votes in favor
1 Votes oppose
1 Votes abstaining**

Position Point #9 Passes as written below:

ROG agrees that the exemption should remain in place.

Tagging sites: SFWG proposes maintaining the option to move cattle to a tagging site where they are tagged on behalf of the owner or person responsible.

ROG agrees with SWFG that this exemption should remain in place as it may provide a means to more efficiently and economically identify cattle.

Official identification options as agreed on by shipping and receiving States: SFWG proposes removing the exemption that allows alternative methods of identification.

ROG is in disagreement with the SWFG proposal and believes alternative methods of identification (such as brands) should not be replaced. State health officials' agreements should remain within their discretion.

Direct to slaughter movements:

- SFWG recommends continuing the current exemption allowing cattle to move from ranch/farm direct to slaughter on an official USDA back tag and retaining the stipulation that requires official identification of cattle moved from the slaughter plant.

ROG agrees with the SFWG that the exemption should remain in force.

- SFWG proposes the removal of the exemption of ear tagging cattle moving to slaughter through one approved livestock facility, unless industry, State, and federal officials collaborate to administer specific control protocols to ensure that these cattle move direct to slaughter from the approved facility.

ROG proposes that there be no change to the current exemption that recognizes the movement of cattle through approved facilities to slaughter and the current requirement for the approved facilities to utilize official back tags.

- SFWG proposes phasing out official identification exemptions for direct to slaughter movements, based on the EID timelines, to ensure all cattle covered in the regulation arrive at the slaughter plant with the same technology.

ROG is not in favor of the SFWG proposal.

In summary ROG supports the continuance of all exemptions that currently exists under 9 CFR Part 86 until such time as State and federal officials provide a uniform set of regulations that demonstrably allow industry to identify cattle in a more economical and efficient manner.