United States Animal Health Association
2019 Resolution
123rd Annual Meeting
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**RESOLUTION NUMBER: 33** **APPROVED**

**SUBJECT MATTER: Backup Identification of Livestock in Commerce**

**BACKGROUND INFORMATION:**

On March 11, 2013, the United States Department of Agriculture (USDA) Animal Disease Traceability rule became effective. Unless specifically exempted, livestock moving interstate must be officially identified and accompanied by an interstate certificate of veterinary inspection or other documentation, such as owner-shipper statements or brand certificates. Stocker/feeder cattle less than 18 months of age are exempted from the rule. States are allowed to issue official National Uniform Eartagging System (NUES) tags to producers to identify livestock.

We strongly support the implementation of the radio frequency identification (RFID) tag as the primary method of official identification. For cattle exporters, low frequency RFID tags have long been the international standard for cattle identification. We believe the transition to RFID tags as the primary official identification tag to be long overdue and an important step in protecting the health of our animals and the strength of our industry. The low frequency (LF) RFID tag allows us to better identify one specific animal at a time – an important ability when working in close systems, such as head locks/stanchions and necessary due to the particular nature of our work. We have been using LF RFID tags for years, specifically the 840 combo tag. We are right there, side by side, wand in hand, with our efficient USDA inspectors during export inspections and have been from the start.

We are, however, very concerned with the current plan to eliminate the old metal (NUES/Steel/Brite) tag for official usage, even as a backup identification (ID). Having only one form of official ID leaves us vulnerable to identification error, which can have far reaching disease and economic consequences. Despite the high retention of RFID tags, when dealing with thousands of animals, ID tags are frequently lost. Identifying the exact animal with a lost RFID in a small, closed herd, may not be a problem, however, when dealing with large combined groups assembled from multiple herds, we must rely on the implementation of an additional official ID for correct identification. Cattle exporters commonly use combo RFID tags – when that RFID is lost, so is the animal's visual ID. If a metal tag is in place as a backup source of official ID, these cattle can still be identified or rectified.

Cattle exports undergo health testing at an approved laboratory associated with the official ID. If an animal loses their RFID while undergoing final export inspection, and if the animal has lost the single RFID official ID, it is then impossible to demonstrate that the animal has undergone the necessary health testing. Because of this one tag loss, the whole shipment would be stopped, as there is now one animal with a different health

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status than the group. If that animal was tagged with both a RFID and a metal tag, and both are forms of official ID, the second is checked and the problem is solved, and the shipment continues. A solid unique backup is vital in the fight to protect our animal's health and industry's bottom-line. Because uniqueness is a vital requirement of an official ID, RFID tags cannot be manufactured with duplicate numbers. Double-tagging an animal with dual RFIDs is also problematic. Double RFIDs of the same frequency causes ID confusion. Double RFID tagging of a different frequency requires either multiple wands, a significant expense in hardware and software, or manual entry of bulky 15-digit RFID numbers, an obvious user/entry error issue and a significant time delay. In the face of all of these concerns and the presence of already implemented and tested system, we urge USDA/APHIS to keep the metal tag as a backup official ID.

We understand that this scenario was not envisioned with the transition to RFID as the official ID, and while we fully support RFID as official ID, it is also necessary to retain the NUES tags for backup, secondary official ID, to be purchased by the producer, and to only be used when RFID tags are already in place.

**RESOLUTION:**

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA) and State Animal Health Officials to work with livestock exporters to ensure a system is in place to allow for a backup identification system for animals being exported to account for loss of official identification.

**INTERIM RESPONSE:**

USDA, APHIS, 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 continues to work with livestock exporters to ensure there is a backup identification system is in place for animals being exported if metal tags are discontinued as USDA official identification.

**FINAL RESPONSE:**

USDA, Animal and Plant Health Inspection Service (APHIS), Veterinary Services recognizes the concerns of USAHA and appreciates the opportunity to respond. The Animal Disease Traceability rule (title 9, *Code of Federal Regulations* (9 CFR), 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, the APHIS continues to work with livestock exporters and will ensure there is a backup identification system in place for animals being exported. Currently either metal tags or a second RFID tag of a different frequency may be used for back-up identification. Dual RFID tags provide significant cost savings by avoiding time and stress on cattle for manual restraining cattle to read visual tags. Current advancements in technology may provide in the future an option for readers to read both frequencies and seamlessly integrate data as cattle move

through the alleyways. APHIS is also considering the option of a specific export visual tag; however, no decisions have been reached on this option if metal tags are discontinued.